

WRITER'S DIRECT DIAL NO.
(202) 538-8120

WRITER'S EMAIL ADDRESS
williamburck@quinnemanuel.com

March 15, 2016

VIA EMAIL AND FEDEX

Ms. Lisa Foster
Victim-Witness Coordinator
U.S. Attorney's Office,
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

Re: Victim Request for Immediate Accounting of Funds and Assets for Defendant Jeffrey Webb, Defendant in *United States v. Jeffrey Webb, et. al.*, 15-CR-252 (RJD)

Dear Ms. Foster:

We represent the Fédération Internationale de Football Association ("FIFA"), which is a victim of the wrongful acts of multiple defendants in the above referenced matter, as well as in *United States v. Blazer*, 13-cr-602; *United States v. Hawilla, et al.*, 14-cr-609; *United States v. Bedoya*, 15-cr-569; *United States v. Danis*, 15-cr-240; *United States v. Huguet*, 15-cr-585; *United States v. Jadue*, 15-cr-570; *United States v. Tordin*, 15-cr-564; *United States v. Warner*, 13-cr-402; and *United States v. Warner*, 13-cr-584. Defendants who have harmed FIFA and who have pleaded guilty include but are not limited to:

- Jeffrey Webb, who has agreed to forfeit more than \$6.7 million;
- Chuck Blazer who has agreed to forfeit at least \$1.958 million;
- Daryan Warner who has agreed to forfeit in excess of \$1.177 million; and
- Jose Hawilla, who has agreed to forfeit in excess of \$151.713 million.

As information kindly provided by the U.S. Attorney's Office makes clear, the Mandatory Restitution Act of 1996, 18 U.S.C. § 3663A, establishes rights and procedures for victims of federal crimes. Any identified victim, including an organization, is entitled to an order of restitution as part of the criminal sentence imposed on a defendant, for losses suffered as

a result of the defendant's wrongdoing. Enclosed please find FIFA's Victim Statement and Request for Restitution for the losses it has suffered as a result of the defendants' conspiracies and schemes. Investigation of these matters continues and an exact value of losses remains to be calculated, but on information and belief is likely to exceed tens of millions of dollars. FIFA respectfully requests that it be advised of any information that the U.S. Probation Office requires for the assessment of restitution.

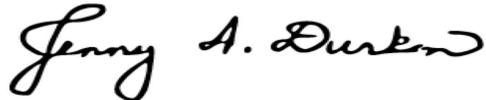
As a victim in these proceedings, FIFA also respectfully requests that the U.S. Probation Office conduct an immediate accounting of funds and assets of Defendant Jeffrey Webb. Mr. Webb pleaded guilty and is currently on release, subject to the supervision of the U.S. Probation Office and to the terms of the plea agreements entered with the U.S. Department of Justice. FIFA is concerned that Mr. Webb may not have fully disclosed his assets to the Court or to the Government. At a minimum, his resources are not being protected for the benefit of his victims.

A recent media report, enclosed, makes clear that Defendant Webb continues his extravagant lifestyle. Webb continues to live in the home that he may have purchased with bribes and kickbacks. Moreover, according to reports, he recently hosted an expensive themed birthday party for his wife, replete with entertainment and gambling tables. Ironically, a photo (purportedly posted on Facebook and included in the enclosed article) shows Mr. Webb playing a winning hand at the blackjack table. Having violated his duties to FIFA and others, it is time for Webb to honestly account for all of the assets available to compensate his victims.

Respectfully submitted,
Quinn Emanuel Urquhart & Sullivan, LLP



William A. Burck



Jenny A. Durkan



Thomas Werlen



Stephen M. Hauss

Enclosures

CC: Evan Norris, United States Attorney's Office, Eastern District of New York
United States Probation Office, Eastern District of New York