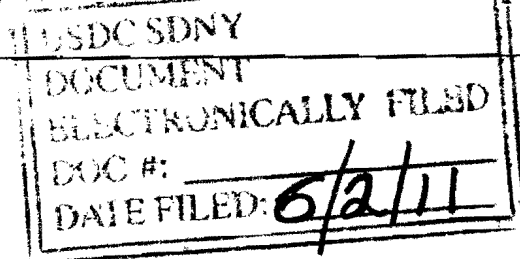


U.S. Department of Justice

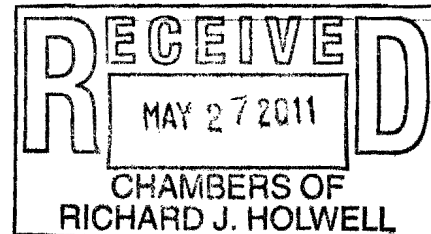


United States Attorney
Southern District of New York



The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 26, 2011

**BY FACSIMILE**

Honorable Richard J. Holwell
United States District Judge
United States Courthouse
500 Pearl Street, Room 1950
New York, New York 10007

Re: United States v. All Right, Title and Interest in Real Property and
Appurtenance Located at Trump Park Avenue Condominium, Unit 6A (502
Park Avenue, New York, New York)
04 Civ. 8918 (RJH)

Dear Judge Holwell:

The Government writes to respectfully apprise the Court of the status of the above-referenced forfeiture action. On December 3, 2009, the Government sent respective counsel for Timothy Garcia and Clarita Garcia a proposed Stipulation and Order setting forth their agreement to waive any and all claims and interests in the real property that is the subject of the action as well as certain bank account funds. The parties agreed that the Stipulation and Order would be executed upon the Philippines government's withdrawal of its requests to extradite Timothy Garcia and Clarita Garcia for corruption-related charges. Based on an agreement between the Garcias and the Philippines government, such withdrawal is contingent on the acceptance by the Sandigbayan (a Philippines court) of a guilty plea by General Carlos Garcia, their co-defendant in that case. General Garcia pled guilty on or about March 16, 2010. On or about June 4, 2010, Timothy and Clarita Garcia, and their respective counsel, executed the Stipulation and Order, but as noted above, the parties have agreed to postpone entry of the Stipulation and Order until the Philippines government formally withdraws its extradition requests. Recently, on or about May 9, 2011, General Garcia's guilty plea was accepted by the Sandigbayan in a 157 page decision. The extradition requests however have not yet been formally withdrawn.

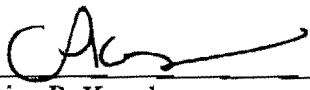
Honorable Richard J. Holwell
May 26, 2011

The Government has conferred with James Kousouros, Esq., counsel for Timothy Garcia, who respectfully requests two weeks to confer with his client and the Government on resolving this matter. If acceptable to the Court, the Government or Mr. Kousouros would provide the Court with a status update on or about June 10, 2011. The Court's continued consideration is appreciated.

Respectfully submitted,

PREET BHARARA
United States Attorney

By:



Lisa P. Korologos
Daniel P. Chung
Assistant United States Attorneys
(212) 637-2406/2417

Cc: James Kousouros, Esq.

*Counsel shall update the Court
in writing by June 10, 2011.*

SO ORDERED



RICHARD J. HOLWELL
UNITED STATES DISTRICT JUDGE

6/2/11