UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK SEALED \_\_\_\_\_\_X : POST-INDICTMENT UNITED STATES OF AMERICA PROTECTIVE ORDER, : PURSUANT TO - v. -21 U.S.C. §853(e)(1)(A) : LIBERTY RESERVE S.A., ARTHUR BUDOVSKY, : a/k/a "Arthur Belanchuk," 13 Cr. 368 ( a/k/a "Eric Paltz," : VLADIMIR KATS, a/k/a "Ragnar," : AHMED YASSINE ABDELGHANI, a/k/a "Alex," : ALLAN ESTEBAN HIDALGO JIMENEZ, a/k/a "Allan Garcia," : AZZEDDINE EL AMINE, MARK MARMILEV, : a/k/a "Marko," a/k/a "Mark Halls," and : MAXIM CHUKHAREV, : Defendants. 

WHEREAS, on or about May 23, 2013, by and through PREET BHARARA, United States Attorney for the Southern District of New York, the Government submitted a sealed application of Assistant United States Attorney **Example 1**, together with the sealed declaration of Special Agent **Example 1** of the United States Secret Service ("USSS") seeking certain relief pursuant to Title 21, United States Code, Section 853(e)(1)(A);

WHEREAS, a Grand Jury sitting in this District has returned an Indictment charging LIBERTY RESERVE, ARTHUR BUDOVSKY, a/k/a "Arthur Belanchuk," a/k/a "Eric Paltz," VLADIMIR KATS, a/k/a "Ragnar," AHMED YASSINE ABDELGHANI, a/k/a "Alex," ALLAN ESTEBAN HIDALGO JIMENEZ, a/k/a "Allan Garcia," AZZEDDINE EL AMINE, MARK MARMILEV, a/k/a "Marko," a/k/a "Mark Halls," and MAXIM CHUKHAREV, the defendants, with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h); conspiracy to operate an unlicensed money transmitting business, in violation of 18 U.S.C. § 371; and operation of an unlicensed money transmitting business, in violation of 18 U.S.C. §§ 1960 and 2;

WHEREAS, the Indictment specifically alleged that the domain name LIBERTYRESERVE.COM, registered with AB Name ISP, Radiovagen 2, Teknikhuset, 421 47 Vastra Frolunda, Sweden, (the "Forfeitable Property") is subject to criminal forfeiture, pursuant to Title 18, United States Code, Sections 982(a)(1);

WHEREAS, Liberty Reserve uses Amazon Web Services, Inc. ("Amazon") to provide services related to the operation of its website, www.libertyreserve.com. In particular, the public facing internet protocol ("IP") addresses of the Forfeitable Property are owned and controlled by Amazon, and Amazon routes traffic to the server(s) that host the Liberty Reserve website.

WHEREAS, the Court finds that there is probable cause to believe that in the event that the defendants are convicted of the charges in the Indictment, the Forfeitable Property will be subject to criminal forfeiture;

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WHEREAS, the Court further finds that an injunction is necessary to preserve the Forfeitable Property for forfeiture, and to prevent the use of the Forfeitable Property for unlawful purposes;

## IT IS HEREBY ORDERED that:

1. Amazon Web Services, Inc. shall, on the date and at the time specified by the USSS, or as soon as practicable thereafter, cease providing to Liberty Reserve any services that support the operation of the Forfeitable Property, including but not limited to ceasing to direct web traffic to the Forfeitable Property.

IT IS FURTHER ORDERED that:

2. This Order shall remain in effect until further order of this Court;

## IT IS HEREBY FINALLY ORDERED that:

3. This Order shall remain under seal until the unsealing of the Indictment, 13 Crim. 368, or further Order of this Court, except that the United States Attorney's Office for the Southern District of New York may obtain and disseminate copies of this Order as necessary to execute this Order.

Dated: New York, New York May <u>23</u>, 2013

SO ORDERED:

HONORABLE UNITED STATES DISTRICT JUDGE SOUTHERN DISTRICT OF NEW YORK