

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA :

- v. - :

SUPERSEDING  
INFORMATION

LARISA MEDZON, :

S3 11 Cr. 121 (GBD)

Defendant. :

- - - - - x

COUNT ONE

The United States Attorney charges:

1. From at least in or about June 2006 up to and including in or about December 2010, in the Southern District of New York and elsewhere, LARISA MEDZON, the defendant, knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, caused and attempted to cause a domestic financial institution to fail to file a report required under section 5313(a) of Title 31, and any regulation prescribed thereunder, and structured, and assisted in structuring, transactions with one and more domestic financial institutions, to wit, MEDZON withdrew more than \$200,000 derived from the CityTime project from accounts at multiple financial institutions in increments of \$500 or less in order to evade the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder.

(Title 31, United States Code, Sections 5324(a)(1) and (a)(3)).

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Information, LARISA MEDZON, the defendant, shall forfeit to the United States, pursuant to 31 U.S.C. § 5317(c)(1), all right, title and interest of herself and any entities she controls to the following funds, accounts and properties:

- a. Approximately \$680,266 in United States currency formerly on deposit in account number 8310823106, held in the name of MAS Solutions Inc., at Astoria Federal Savings Bank;
- b. Approximately \$792,422 in United States currency formerly on deposit in account number 8310823093, held in the name of Front Line Consulting Corp., at Astoria Federal Savings Bank;
- c. Approximately \$746,417 in United States currency formerly on deposit in account number 483023745998, held in the name of SJM Services Inc., at Bank of America;
- d. Approximately \$540,483.18 in United States currency formerly on deposit in account number 483006909751, held in the name of MS Advantage Group LLC, at Bank of America;
- e. Approximately \$348,730 in United States currency formerly on deposit in account number 7047355456, held in the name of MS Advantage Group LLC, at Capital One;
- f. Approximately \$140,918.95 in United States currency formerly on deposit in account number 5800168351, held in the name of MS Advantage Group LLC, at Capital One;
- g. Approximately \$1,058,593.70 in United States currency formerly on deposit in account number

3084010713, held in the name of MAS Solutions Inc, at Capital One;

- h. Approximately \$201,413.83 in United States currency formerly on deposit in account number 445001417365, held in the name of Svetlana Mazer as Custodian for Alexander Mazer under the N.Y.U.T.M.A., at JPMorgan Chase Bank;
- i. Approximately \$65,419.67 in United States currency formerly on deposit in account number 10611000801, held in the name of Mark Mazer ITF Svetlana Mazer, at JPMorgan Chase Bank;
- j. Approximately \$210,265.79 in United States currency formerly on deposit in account number 2730264393, held in the name of Mark Mazer as Custodian for Michael Mazer under the N.Y.U.T.M.A., at JPMorgan Chase Bank;
- k. Approximately \$2,898 in United States currency formerly on deposit in account number 753521327, held in the name of Svetlana Mazer Trust 2005 Leonid Gorelik TTE or Mark Mazer TTE, at JPMorgan Chase Bank;
- l. Approximately \$4,965.25 in United States currency formerly on deposit in account number 893007682, held in the name of Susan Mazer or Mark Mazer, at JPMorgan Chase Bank;
- m. Approximately \$253,266.29 in United States currency formerly on deposit in account number 2956974956, held in the name of Susan Mazer or Mark Mazer, at JPMorgan Chase Bank;
- n. Approximately \$21,117.33 in United States currency formerly on deposit in account number 445609492401, held in the name of Svetlana Mazer as Custodian under the N.Y.U.T.M.A. for Alexander Mazer, at JPMorgan Chase Bank;
- o. Approximately \$66,812.70 in United States currency formerly on deposit in account number 445609491601, held in the name of Svetlana Mazer as Custodian under N.Y.U.T.M.A. for Michael Mazer, at JPMorgan Chase Bank;

- p. Approximately \$14,903.30 in United States currency formerly on deposit in account number 445609490801, held in the name of Svetlana Mazer as Custodian under the N.Y.U.T.M.A. for Susan Mazer, at JPMorgan Chase Bank;
- q. Approximately \$164,224.63 in United States currency formerly on deposit in account number 445001163401, held in the name of Svetlana Mazer, at JPMorgan Chase Bank;
- r. Approximately \$58,768.34 in United States currency formerly on deposit in account number 445001163465, held in the name of Svetlana Mazer, at JPMorgan Chase Bank;
- s. Approximately \$70,000 in United States currency formerly on deposit in account number 937009958065, held in the name of Anna Makovetskaya and Yuiy Makovetskiy, at JPMorgan Chase Bank;
- t. Approximately \$949,826.79 in United States currency formerly on deposit in account number 151128566965, held in the name of SJM Services, Inc., at JPMorgan Chase Bank;
- u. Approximately \$227,096.39 in United States currency formerly on deposit in account number 445501101265, held in the name of MS Properties LLC, at JPMorgan Chase Bank;
- v. Approximately \$910,227.39 in United States currency formerly on deposit in account number 3152815195, held in the name of MAS Solutions, Inc., at JPMorgan Chase Bank;
- w. Approximately \$1,551,936.38 in United States currency formerly on deposit in account number 445501011665, held in the name of MAS Solutions, Inc., at JPMorgan Chase Bank;
- x. Approximately \$259,957.82 in United States currency formerly on deposit in account number 006606695, held in the name of Larisa Medzon or Ilya Medzon, at JPMorgan Chase Bank;

- y. Approximately \$6,389.60 in United States currency formerly on deposit in account number 006619428, held in the name of Larisa Medzon or Ilya Medzon, at JPMorgan Chase Bank;
- z. Approximately \$304,003.44 in United States currency formerly on deposit in account number 441005778265, held in the name of Ilya Medzon, at JPMorgan Chase Bank;
- aa. Approximately \$4,491.68 in United States currency formerly on deposit in account number 441011340665, held in the name of Ilya Medzon, at JPMorgan Chase Bank;
- bb. Approximately \$831,053.06 in United States currency formerly on deposit in account number 756832192, held in the name of Front Line Consulting Corp., at JPMorgan Chase Bank;
- cc. Approximately \$192,175.62 in United States currency formerly on deposit in account number 4826941498, held in the name of Svetlana Mazer Custodian Michael Mazer Donee, at JPMorgan Chase Bank;
- dd. Approximately \$18,502.19 in United States currency formerly on deposit in account number 4826941480, held in the name of Svetlana Mazer Custodian Susan J. Mazer Donee, at JPMorgan Chase Bank;
- ee. Approximately \$3,570 in United States currency formerly on deposit in account number 753521376, held in the name of Mark Mazer Trust 2005 Leonid Gorelik TTE or Svetlana Mazer TTE, at JPMorgan Chase Bank;
- ff. Approximately \$2,529.94 in United States currency formerly on deposit in account number 006606679, held in the name of Larisa Mazer or Mark Mazer, at JPMorgan Chase Bank;
- gg. Approximately \$6,154.69 in United States currency formerly on deposit in account number 006619371, held in the name of Larisa Mazer or Mark Mazer, at JPMorgan Chase Bank;

- hh. Approximately \$5,797.25 in United States currency formerly on deposit in account number 10609923265, held in the name of Mark Mazer, at JPMorgan Chase Bank;
- ii. Approximately \$1,457.97 in United States currency formerly on deposit in account number 112258301, held in the name of Svetlana Mazer or Mark Mazer, at JPMorgan Chase Bank;
- jj. Approximately \$223,552.85 in United States currency formerly on deposit in account number 112345328, held in the name of Svetlana Mazer or Mark Mazer, at JPMorgan Chase Bank;
- kk. Approximately \$228,000 in United States currency formerly on deposit in account number 9340226293, held in the name of Larisa Medzon, at JPMorgan Chase Bank;
- ll. Approximately \$663,875.51 in United States currency formerly on deposit in account number 3152815294, held in the name of Front Line Consulting Corp., at JPMorgan Chase Bank;
- mm. Any and all funds on deposit in account number 3110071086, held in the name of MS Development Services Corp., at JPMorgan Chase Bank;
- nn. Approximately \$297,312.21 in United States currency formerly on deposit in account number 58385994, held in the name of SJM Services, Inc., at Citibank;
- oo. Approximately \$494,141.42 in United States currency formerly on deposit in account number 9932333666, held in the name of SJM Services, Inc., at Citibank;
- pp. Approximately \$301,053.45 in United States currency formerly on deposit in account number 9941951976, held in the name of MS Development Services Corp., at Citibank;
- qq. Approximately \$250,523.93 in United States currency formerly on deposit in account number 27362730, held in the name of Svetlana Mazer

ACF Alexander Mazer under the N.Y.U.T.M.A., at Citibank;

- rr. Any and all funds on deposit in account number 16289822, held in the name of Larisa Medzon, at Citibank;
- ss. Any and all funds on deposit in account number 0071215088873, held in the name of Mark Mazer as Custodian for Michael Mazer, at Dreyfus;
- tt. Approximately \$91,729.16 in United States currency formerly on deposit in account number 486040479, held in the name of Fidelity Management Trust Co. - Trustee - Front Line Consulting Corp. - Fidelity Self-Employed 401(k) for the Benefit of Larisa Medzon - Plan Administrator, at Fidelity Investments;
- uu. Approximately \$127,245.29 in United States currency formerly on deposit in account number 486247367, held in the name of Fidelity Management Trust Co. - Trustee - SJM Services Inc. - Fidelity Self-Employed 401(k) for the Benefit of Larisa Medzon - Plan Administrator, at Fidelity Investments;
- vv. Approximately \$807,389.90 in United States currency formerly on deposit in account number Z71-925713, held in the name of Larisa Medzon and Ilya Medzon with Rights of Survivorship, at Fidelity Investments;
- ww. Any and all funds on deposit in account number 481930253, held in the name of Fidelity Management Trust Co. - Trustee - MS Creative Technologies Inc. - Money Purchase Keogh for the Benefit of Mark Mazer - Svetlana Mazer - Plan Administrator, at Fidelity Investments;
- xx. Any and all funds on deposit in account number 485806307, held in the name of Fidelity Management Trust Co. - Trustee - MS Creative Technologies Inc. - Fidelity Self-Employed 401(k) for the Benefit of Mark Mazer - Plan Administrator, at Fidelity Investments;

- yy. Any and all funds on deposit in account number Z85251682, held in the name of MS Advantage Group LLC, at Fidelity Investments;
- zz. Any and all funds on deposit in account number X02923435, held in the name of Svetlana Mazer, at Fidelity Investments;
- aaa. Any and all funds on deposit in account number 485806315, held in the name of Fidelity Management Trust Co. - Trustee - MS Development Services Corp. - Fidelity Self-Employed 401(k) for the Benefit of Svetlana Mazer - Plan Administrator, at Fidelity Investments;
- bbb. Any and all funds on deposit in account number 486108588, held in the name of Fidelity Management Trust Co. - Trustee - MS Development Services Corp. - Money Purchase Keogh for the Benefit of Svetlana Mazer - Plan Administrator, at Fidelity Investments;
- ccc. Approximately \$291,000 in United States currency formerly on deposit in account number 1484005461, held in the name of Larisa Medzon, at Flushing Savings Bank;
- ddd. Approximately \$100,643.81 in United States currency formerly on deposit in account number 136659152, held in the name of Svetlana Mazer and Mark Mazer, at HSBC Bank;
- eee. Approximately \$4,290.46 in United States currency formerly on deposit in account number 136734863, held in the name of Svetlana Mazer and Mark Mazer, at HSBC Bank;
- fff. Approximately \$161,192.74 in United States currency formerly on deposit in account number 136721893, held in the name of MS Development Services Corp., at HSBC Bank;
- ggg. Approximately \$685,251.28 in United States currency formerly on deposit in account number 136721907, held in the name of MS Advantage Group LLC, at HSBC Bank;



- hhh. Approximately \$822,936.60 in United States currency formerly on deposit in account number 136724728, held in the name of MAS Solutions, Inc., at HSBC Bank;
- iii. Approximately \$718,095.22 in United States currency formerly on deposit in account number 136724736, held in the name of Front Line Consulting Corp., at HSBC Bank;
- jjj. Approximately \$198,470.67 in United States currency formerly on deposit in account number 691019819, held in the name of MS Creative Technologies Inc., at HSBC Bank;
- kkk. Any and all funds on deposit in account number 136733239, held in the name of Susan Mazer, at HSBC Bank;
- lll. Any and all funds on deposit in account number 136664393, held in the name of Susan Mazer ITF Alexander Mazer and Michael Mazer, at HSBC Bank;
- mmm. Any and all funds on deposit in account number 136606008, held in the name of Susan Mazer MNR Svetlana Mazer Custodian, at HSBC Bank;
- nnn. Any and all funds on deposit in account number 691008264, held in the name of Larisa Mazer, at HSBC Bank;
- ooo. Any and all funds on deposit in account number 136606016, held in the name of Michael Mazer MNR Svetlana Mazer Custodian, at HSBC Bank;
- ppp. Any and all funds on deposit in account number 9832763339, held in the name of Larisa Medzon, at M&T Bank;
- qqq. Approximately \$565,021 in United States currency formerly on deposit in account number 9846491745, held in the name of Front Line Consulting Corp., at M&T Bank;
- rrr. Approximately \$140,888.32 in United States currency formerly on deposit in account number 0088446497, held in the name of Michael Mazer,

Minor, Svetlana Mazer, Custodian, U.T.M.A., at Sovereign Bank;

- sss. Approximately \$397,545 in United States currency formerly on deposit in account number 0971122725, held in the name of MS Advantage Group LLC, at Sovereign Bank;
- ttt. Approximately \$10,012.03 in United States currency formerly on deposit in account number 3580520520, held in the name of MS Advantage Group LLC, at Sovereign Bank;
- uuu. Approximately \$419,498.80 in United States currency formerly on deposit in account number 788657322, held in the name of Anna Makovetskaya, at TD Ameritrade;
- vvv. Any and all funds on deposit in account number 787-453364, held in the name of Svetlana Mazer, at TD Ameritrade;
- www. Any and all funds on deposit in account number 883-549297, held in the name of Mark Mazer, at TD Ameritrade;
- xxx. Approximately \$1,513,409.16 in United States currency formerly on deposit in account number 883-564890, held in the name of Mark Mazer and Svetlana Mazer JT TEN, at TD Ameritrade;
- yyy. Any and all funds on deposit in account number 883-588599, held in the name of Mark Mazer Roth IRA for MS Creative Tech., at TD Ameritrade;
- zzz. Any and all funds on deposit in account number 883-589685, held in the name of Svetlana Mazer Roth IRA for MS Creative Tech., at TD Ameritrade;
- aaaa. Any and all funds on deposit in account number 883-594076, held in the name of Svetlana Mazer Rollover Roth IRA for MS Creative Tech., at TD Ameritrade;
- bbbb. Any and all funds on deposit in account number 885-971584, held in the name of Svetlana Mazer and Susan Mazer Joint, at TD Ameritrade;

- cccc. Any and all funds on deposit in account number 885-971595, held in the name of Svetlana Mazer and Alexander Mazer Joint, at TD Ameritrade;
- dddd. Any and all funds on deposit in account number 885-971598, held in the name of Svetlana Mazer and Michael Mazer Joint, at TD Ameritrade;
- eeee. \$244,254.46 in United States currency on deposit in account number 883-564076, held in the name of Larisa Medzon and Ilya Medzon, at TD Ameritrade;
- ffff. Any and all funds on deposit in account number 862265071, held in the name of Michael Mazer, at TD Ameritrade;
- gggg. Approximately \$810,405.21 in United States currency formerly on deposit in account number 4245896365, held in the name of MAS Solutions, Inc., at TD Bank;
- hhhh. Approximately \$138,991.82 in United States currency formerly on deposit in account number 7926044467, held in the name of Larisa Medzon or Mark Mazer, at TD Bank;
- iiii. Approximately \$235,774.05 in United States currency formerly on deposit in account number 7925069739, held in the name of Larisa Medzon, at TD Bank;
- jjjj. Approximately \$1,120,561.43 in United States currency formerly on deposit in account number 7923169507, held in the name of Front Line Consulting Corp., at TD Bank;
- kkkk. Any and all funds on deposit in account number 2000059128779, held in the name of MS Advantage, at Wells Fargo;
- llll. Approximately \$893,536.40 in United States currency formerly on deposit in account number 2000038385999, held in the name of Front Line Consulting Corp., at Wells Fargo;

- mmmm. Approximately \$233,194 in United States currency formerly on deposit in account number 2000038347089, held in the name of MS Advantage Group LLC, at Wells Fargo;
- nnnn. Approximately \$205,350 in United States currency seized on or about December 16, 2010 from Safe Deposit Box No. 411 at Chase, Munsey Park, 2111 Northern Blvd., Manhasset, New York 11030;
- oooo. Approximately \$178,900 in United States currency seized on or about December 16, 2010 from Safe Deposit Box No. 1862 at Citibank, 1075 Northern Blvd., Roslyn, New York 11576;
- pppp. Approximately \$200,000 in United States currency seized on or about December 16, 2010 from Safe Deposit Box No. 2108-958 at Sovereign Bank, 1420 Northern Blvd., Manhasset, New York 11030;
- qqqq. Approximately \$280,200 in United States currency seized on or about December 16, 2010 from Safe Deposit Box No. 499 at TD Bank, 108-36 Queens Blvd., Forest Hills, New York 11375;
- rrrr. Approximately \$155,100 in United States currency seized on or about January 11, 2011 from Safe Deposit Box No. 741-4 at Citibank, 1110 Northern Blvd., Manhasset, New York 11030;
- ssss. \$182,000 in United States currency representing the substitute *res* for the real property and appurtenances, with all improvements and attachments thereon, located at 66-20/66-26 Laurel Hill Blvd., Woodside, New York 11377;
- tttt. The real property and appurtenances, with all improvements and attachments thereon, located at 59 Harrow Lane, Manhasset, New York 11030;

- uuuu. The real property and appurtenances, with all improvements and attachments thereon, located at 97 Dorchester Drive, Manhasset, New York 11030; and
- vvvv. The real property and appurtenances, with all improvements and attachments thereon, located at 10 West End Avenue, Unit 24A, New York, New York 10023.

Substitute Asset Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 31 U.S.C. § 5317(c)(1) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 31, United States Code, Section 5317,  
and Title 21, United States Code, Section 853.)

  
\_\_\_\_\_  
PREET BHARARA  
United States Attorney

---

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

---

UNITED STATES OF AMERICA

- v -

LARISA MEDZON,

Defendant.

---

---

SUPERSEDING  
INFORMATION

S3 11 Cr. 121 (GBD)

(31 U.S.C. § 5324)

---

PREET BHARARA  
United States Attorney.

---

---