

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA : SUPERSEDING
 : INFORMATION
 :
 - v. - : S2 16 Cr. 467 (AKH)
 :
 MURRAY HUBERFELD, :
 :
 Defendant. :
 :
 :
 :
 :
 :
----- X

COUNT ONE

(Conspiracy to Commit Wire Fraud)

The United States Attorney charges:

1. In or around December 2014, in the Southern District of New York and elsewhere, MURRAY HUBERFELD, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that MURRAY HUBERFELD, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by false and fraudulent pretenses, would and did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in

violation of Title 18, United States Code, Section 1343, to wit, HUBERFELD and Jona Rechnitz, through the use of interstate wires, caused the management company of the Platinum Partners hedge fund ("Platinum"), with which HUBERFELD was affiliated, to pay \$60,000 to Rechnitz's company by falsely representing, including through the use of a fraudulent invoice, that the money was to purchase courtside New York Knicks tickets, when in truth and in fact, and as HUBERFELD and Rechnitz knew, the actual purpose of the payment was to reimburse Rechnitz for having paid Norman Seabrook, the President of the Correction Officers Benevolent Association ("COBA"), for Seabrook's efforts to get COBA to invest millions of dollars in Platinum.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere.

a. On or about December 11, 2014, Jona Rechnitz e-mailed a fraudulent invoice to HUBERFELD, which on its face billed Platinum \$60,000 for tickets to eight Knicks games at \$7,500 per game.

b. On or about December 15, 2014, HUBERFELD coordinated the delivery of a check from Platinum for \$60,000 addressed to Rechnitz's company.

(Title 18, United States Code, Section 371.)



GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MURRAY HUBERFELD,

Defendant.

SUPERSEDING INFORMATION

S2 16 Cr. 467 (AKH)

(Title 18, United States Code, Section 371.)

GEOFFREY S. BERMAN
United States Attorney.
