UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA **CRIMINAL NO. 3:10CR093(AWT)**

v. December 21, 2010

DAVID AVIGDOR,

Defendant.

UNITED STATES' OPPOSITION TO DEFENDANT AVIGDOR'S MOTION FOR BILL OF PARTICULARS

Defendant David Avigdor's motion for a bill of particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure is an improper attempt to obtain a preview of the government's trial evidence and theories of the case, and to freeze the government's evidence before trial. The lengthy and detailed indictment, along with extensive electronic discovery sufficiently notify the defendant of the charges he faces so he can prepare his defense and plead double jeopardy. Thus, a bill of particulars is unnecessary and his motion should be denied.

I. BACKGROUND

A. The Indictment

On July 29, 2010, a grand jury sitting in New Haven returned a fifteen count Second Superseding Indictment (the "Indictment") charging defendant David Avigdor with conspiracy to commit mortgage fraud (Count 1), wire fraud (Counts 2-9), and false statements (Counts 11-14). The 18-page Indictment describes in detail the scheme defendant Avigdor and others engaged in to obtain millions of dollars in residential real estate loans, including loans insured by the FHA, through the use of sham sales contracts, false loan applications and fraudulent property appraisals, and to conceal the conspiracy from others. It details, among other things,

examples of several of the specific property closings involved, specific types of documentation that was false, several individuals who were involved in preparing such documentation and the nature of their involvement, the dates on which certain fraudulent transactions occurred, and the amounts involved in those transactions.

The Indictment explains that defendant Avigdor was an attorney licensed to practice law in the State of Connecticut during the scheme. Indictment ¶ 4. Avigdor was involved with many of the closings on the fraudulent transactions and was essential to the scheme because he distributed the loan proceeds through his lawyer's trust account and, with co-defendant Morris Olmer, created false HUD-1 settlement statements. *Id.*

The Indictment sets forth the purpose of the conspiracy, describes the manner and means of the conspiracy in detail, and recites numerous overt acts in furtherance of the conspiracy. The "Manner and Means" section of the Indictment specifies, as to Avigdor, that:

> It was part of the conspiracy that many of the closings that would and did occur after a lender had approved a loan would be conducted by OLMER, with the closing documents signed by AVIGDOR. The loan proceeds were distributed by interstate wire on many occasions to the IOLTA account of AVIGDOR.

Indictment ¶ 19.

The overt acts section also identifies conduct specific to defendant Avigdor as follows:

> d. On or about March 14, 2008, in connection with the closing for 75 Bradley Avenue, Meriden, AVIGDOR falsely certified that the HUD-1 accurately reflected that the seller had received or would receive $64,995.94, when in fact AVIGDOR wired $64,995.94 to the account of Sheda Telle Construction.
>
> e. On or about March 17, 2008, in connection with the closing for 281 Crown Street, Meriden, AVIGDOR falsely certified that the HUD-1 accurately reflected that the seller had received or would receive $45,537.52, when in fact AVIGDOR wired $45,537.52 to an account of a co-conspirator known to the Grand Jury.

Indictment, ¶ 23(d), (e).

The wire fraud counts set forth eight different instances of wire fraud, specifying for each, the date and amount of the wire transfer, that the wire was from Avigdor's IOLTA account to a business account for a fraudulent construction company Sheda Telle Construction, and the particular property to which the closing pertained. Indictment ¶ 23 (chart).

Similarly, the false statement counts expressly state what defendant is alleged to have done wrong, namely, that:

> AVIGDOR as the settlement agent falsely certified that the HUD-1 was a true and accurate account of the transaction and that he had caused or would cause the funds listed below to be distributed to the seller, when in truth and in fact, the HUD-1 was not a true and accurate account of the transaction, and he did not distribute those funds to the seller, but rather distributed the following funds to Sheda Telle Construction, LLC.

Indictment ¶ 34. The Indictment then goes on to specify for each of the four false statement counts, the date of the fraudulent statement, the property to which it pertained, the cash to seller certified on the HUD-1, and the amount of funds distributed to Sheda Telle from Avigdor's IOLTA account. Indictment ¶ 34 (chart).

B. Additional Information Given to Defendant

In addition to the specifics set forth in the Indictment, the government has supplied the defendant with a substantial amount of discovery collected during the course of its investigation. The government has turned over 21 discs containing tens of thousands of documents collected from various sources in electronic format and recorded calls. The government has also supplied the defendant with a preliminary witness list when it made its initial disclosures in this case. Further, the government has informed the defendant that additional information in the form of witness interview memoranda (memos that would not

otherwise be due until a much later date) will be made available promptly upon the entry of a protective order. Finally, although it has already produced discovery concerning properties it intends to present at trial, the government anticipates providing a list of those particular properties well before trial.

II. ANALYSIS

A. Applicable Law

"Whether to grant a bill of particulars rests within the sound discretion of the district court." *United States v. Panza*, 750 F.2d 1141, 1148 (2d Cir. 1984). "In exercising that discretion, the court must examine the totality of the information available to the defendant – through the indictment, affirmations, and general pre-trial discovery – and determine whether, in light of the charges that the defendant is required to answer, the filing of a bill of particulars is warranted." *United States v. Bin Laden*, 92 F. Supp. 2d 225, 233 (S.D.N.Y. 2000); *see United States v. DeFabritus*, 605 F. Supp. 1538, 1547-48 (S.D.N.Y. 1985) (a court's discretion is to be informed "by certain well established considerations: whether the requested particularization is necessary to a defendant's preparation for trial and the avoidance of unfair surprise at trial"). A denial of a bill of particulars is reviewed for an abuse of discretion. *United States v. Walsh*, 194 F.3d 37, 47 (2d Cir. 1999).

1. A Bill of Particulars is Appropriate Only to Avoid Prejudice

The limited purpose of a bill of particulars is to avoid prejudice to the defendant. It is well settled that the proper scope and function of a bill of particulars is to furnish facts, in addition to those alleged in the indictment, which are necessary to advise a defendant of the charges against him so that he can prepare his defense, avoid unfair surprise, and plead double

jeopardy as a bar to any subsequent prosecution for the same offense. *Wong Tai v. United States*, 273 U.S. 77, 82 (1927); *United States v. Torres*, 901 F.2d 205, 234 (2d Cir. 1990); *United States v. Davidoff*, 845 F.2d 1151, 1154 (2d Cir. 1988); *United States v. Bortnovsky*, 820 F.2d 572, 574 (2d Cir. 1987).

A bill of particulars supplements an indictment to ensure those goals are met. Therefore, "[a] bill of particulars should be required only where the charges of the indictment are so general that they do not advise the defendant of the specific acts of which he is accused." *Torres*, 901 F.2d at 234 (quoting *United States v. Feola*, 651 F. Supp. 1068, 1132 (S.D.N.Y. 1987), *aff'd*, 875 F.2d 857 (2d Cir. 1989)); *Walsh*, 194 F.3d at 47; *United States v. Stroh*, 2000 WL 1833397 at *6 (D. Conn. 2000) (Nevas, J.).

The ultimate test is whether the information sought in a bill of particulars is *necessary* to accomplish the purposes described above and not whether the information sought would merely be helpful. *See United States v. Ferguson*, 478 F. Supp. 2d 220, 226 (D. Conn. 2007); *Stroh*, 2000 WL 1833397 at *6; *United States v. Bernard*, 1998 WL 241205 at *1 (D. Conn. 1998) (Nevas, J.); *United States v. Young & Rubicam*, 741 F. Supp. 334, 349 (D. Conn. 1990). "The defendant bears the burden of showing that the information requested is necessary and that he will be prejudiced without it so as to justify granting a bill of particulars." *Ferguson*, 478 F. Supp. 2d at 226; *see United States v. Barnes*, 158 F.3d 662, 666 (2d Cir. 1998). "A mere statement that the defendant will be prejudiced without the bill is insufficient." *Ferguson*, 478 F. Supp. 2d at 226. Here, the defendant cannot carry that burden.

2. A Bill of Particulars Is Not a Discovery Tool for the Defense or a Means of Freezing the Government's Proof Pre-trial.

A bill of particulars is not a tool for previewing the government's evidence or legal theories in advance of trial. Because the "[a]cquisition of evidentiary detail is not the function of the bill of particulars," *Torres*, 901 F.2d at 234 (quotation omitted), it is not to be used as a vehicle to "compel disclosure of how much the government can prove and how much it cannot, nor to foreclose the government from using proof it may develop as the trial approaches." *United States v. Malinsky*, 19 F.R.D. 426, 428 (S.D.N.Y. 1956); *see Davidoff*, 845 F.2d at 1154 (government need not particularize all of its evidence); *United States v. Rigas*, 258 F. Supp. 2d 299, 303-04 (S.D.N.Y. 2003) (bill of particulars is not meant to lock government into its proof); *Young & Rubicam*, 741 F. Supp. at 349 (bill of particulars is not intended to unduly restrict the government's presentation of its proof at trial). It is not a general investigative tool for the defense, *see Rigas*, 258 F. Supp. 2d at 304. Nor is it a device to compel disclosure of the government's evidence prior to trial. *See United States v. Gottlieb*, 493 F.2d 987, 994 (2d Cir. 1974); *United States v. Acheampong*, 1996 WL 684417 at *1 (D. Conn. Oct. 8, 1996) (Nevas, J.) (denying bill of particulars, noting it is not an investigative tool or "device to compel discovery of the government's evidence or legal theory prior to trial"); *Young & Rubicam*, 741 F. Supp. at 349 (bill of particulars not intended to give a preview of the case). Rather, it is designed to give the defendant only that minimum amount of information necessary to permit him to conduct his own investigation. *United States v. Smith*, 776 F.2d 1104, 1111 (3d Cir. 1985).

There are three basic reasons for these restrictions on the use of bills of particulars. First, their use "is not comparable to discovery in civil [cases] because of the nature of the

issues, the danger of intimidation of witnesses, and the greater danger of perjury and subornation of perjury." *United States v. Persico*, 621 F. Supp. 842, 868 (S.D.N.Y. 1985) (quoting *Malinsky*, 19 F.R.D. at 428). Second, the government must not be compelled "to give a preview of its evidence and legal theories lest the defendant tailor his testimony to explain away the Government's case." *United States v. Jimenez*, 824 F. Supp. 351, 363 (S.D.N.Y. 1993) (citations omitted). Third, the government should not be stopped from "using proof it may develop as the trial approaches." *Id.* (citation omitted). A motion for a bill of particulars should be denied where it would "unduly restrict the Government's ability to present its case." *United States v. Baez*, 62 F. Supp. 2d 557, 559 (D. Conn. 1999) (Nevas, J.).

3. A Bill of Particulars is Not Required Where the Information Sought Has Been Provided in the Indictment or in an Alternate Form, Such as Through Discovery.

"Generally, if the information sought by defendant is provided in the indictment or in some acceptable alternate form, no bill of particulars is required." *Bortnovsky*, 820 F.2d at 574 (citations omitted); *see United States v. Chen*, 378 F.3d 151, 163 (2d Cir. 2004) ("'a bill of particulars is not necessary where the government has made sufficient disclosures concerning its evidence and witnesses by other means.'") (quoting *Walsh*, 194 F.3d at 47); *Barnes*, 158 F.3d at 665-66 (district court did not abuse discretion in denying request for bill of particulars after finding government had provided defense with extensive additional material regarding the case; defendant was unable to establish specific prejudice); *Panza*, 750 F.2d at 1148 (despite 150 separate fraud claims, defendants had been provided all information needed to prepare for trial in discovery).

The Second Circuit has made it clear that extensive disclosure of documents and testimony can be an "acceptable alternate form." *Bortnovsky*, 820 F.2d at 574; *see Baez*, 62 F. Supp. 2d at 559-60 (denying bill of particulars and noting substantial discovery provided by government); *United States v. Mulhall*, 428 F. Supp. 2d 82, 86 (D. Conn. 2006) (detailed mail fraud indictment and discovery from government obviated need for bill of particulars);*United States v. Reinhold*, 994 F. Supp. 194, 201 (S.D.N.Y. 1998) (no bill of particulars where indictment detailed and supplemented by extensive discovery in both the criminal case and a related civil case); *United States v. Laughlin*, 768 F. Supp. 957, 967 (N.D.N.Y. 1991) (information contained in brief negated need for bill of particulars); *United States v. Beech-Nut Nutrition Corp*., 659 F. Supp. 1487, 1499-1500 (E.D.N.Y. 1987) (government's production of 30,000 pages in discovery "must have answered a great many, if not all, of defendants' requests" for bills of particulars). The Second Circuit has also taken into account a prosecutor's explanation to the defense of the charges and its offer to provide all relevant documents in denying a bill of particulars. *See Panza*, 750 F.2d at 1148. *Accord United States v. Diaz*, 303 F. Supp. 2d 84, 89 (D. Conn. 2004).

In denying a bill of particulars, courts have also taken into account the fact that a defendant will have months to review the discovery supplied before any trial takes place. *See United States v. Nicolo*, 523 F. Supp. 2d 303, 317 (W.D.N.Y. 2007) (denying bill of particulars and noting, among other things, that the government had turned over roughly 100,000 documents and that defense counsel would have "many months" to review them before trial); *United States v. Columbo*, 2006 WL 2012511 at *6 (S.D.N.Y. July 18, 2006) (denying bill of particulars and noting defense would have more than a year to review discovery). Courts also

consider the fact that the government will have to produce its trial exhibits and trial witness list well in advance of trial as substantially reducing the likelihood of unfair surprise at trial, thereby avoiding the need for a bill of particulars. *See Columbo*, 2006 WL 2012511 at *6.

B. Discussion

1. The Defendant Has All the Information He Needs to Mount a Defense, Avoid Unfair Surprise, and Plead Double Jeopardy.

The factors considered by courts when reviewing motions for bills of particulars, including the details in the indictment, other sources of information available to the defendants, as well as the defendants' ability to examine that information before trial, militate heavily against granting a bill of particulars in this matter. Specifically, the defendant has the information needed to mount a defense of this case and will have more than adequate time to review it before trial. Moreover, based on the detailed indictment and the voluminous discovery provided, there is no risk of unfair surprise and no danger of double jeopardy.

As described above, the government has supplied the defendant with a substantial amount of discovery collected during the course of its investigation. The government has turned over 21 discs containing tens of thousands of pages of documents collected from various sources in electronic format and recorded calls. The government has also supplied the defendant with a preliminary witness list when it made its initial disclosures in this case. Further, the government has informed the defendant that additional information in the form of witness interview memoranda (memos that would not otherwise be due until a much later date) will be made available promptly upon the entry of a protective order. Finally, although it has already produced discovery concerning properties it intends to present at trial, the government anticipates providing a list of those particular properties well before trial.

2. The Defendant's Specific Requests for Particulars are Unnecessary and Inconsistent with the Purposes of a Bill of Particulars.

Defendant claims that the Count One "fails to state any of the overt acts to support the governments [sic] charge that a conspiracy existed at all, or that David Avigdor was a participant in the conspiracy at all." Not so. Count One plainly states that the defendant participated in the conspiracy by signing fraudulent closing documents and by falsely certifying on HUD-1s that sellers had or would receive certain proceeds, when in fact, defendant used his IOLTA account to wire undisclosed funds to Sheda Telle Construction. Indictment ¶¶ 4, 19, 23(d)-(e). In addition, the Indictment specifies numerous other overt acts committed by others that support the existence of the charged conspiracy.

Similarly, defendant's claim that the false statement counts do not adequately inform him "which material acts or omissions constitute the crime of false statement" is plainly wrong. The Indictment specifically describes defendant Avigdor's role in the false statement counts, namely, that "AVIGDOR as the settlement agent false certified that the HUD-1 was a true and accurate account of the transaction and that he had caused or would cause the funds listed below to be distributed to the seller, when in truth and in fact, the HUD-1 was not a true and accurate account of the transaction, and he did not distribute those funds to the seller, but rather distributed the following funds to Sheda Telle Construction, LLC." Indictment ¶ 36. The Indictment then goes on to detail in chart format the particular transactions involved in the false statement counts, providing the date, property address, and the amount defendant distributed through his lawyer's trust account to Sheda Telle versus the amount certified on the HUD-1 as cash to seller. That is far more than sufficient.

A review of the defendant's individual requests for particulars demonstrates that a bill of particulars is unwarranted. Defendant's motion requests the date of the earliest statement or event upon which the government will rely to prove that a conspiracy existed [Doc. # 145, David Avigdor, 11/15/10 at 1, ¶ 1]; the dates on which each defendant joined the conspiracy (*Id.* ¶¶ 3, 4); and "the nature of any and all statements and/or events other than those already contained in the indictment upon which the government intends to rely to prove a conspiracy existed" (*Id.* ¶ 2); and "which acts or omissions were committed by David Avigdor which constitute materially false statements on a HUD-1 or specific acts by Mr. Avigdor that constitute a violation of the criminal laws of the United States of America." (*Id.* ¶ 5).

As to the particular dates that various members of the conspiracy may have joined the conspiracy, the defendant is simply not entitled to that level of specificity, as "it is not the [g]overnment's burden at trial to establish a precise chronology as to when each defendant, as well as other unindicted co-conspirators, jointed the conspiracies[,] . . . [that information] is not necessary to the [d]efendants' preparation." *In re Terrorist Bombings of U.S. Embassies in East Africa*, 552 F.3d 93 (2d Cir. 2008). As courts in this circuit have routinely held, "[t]o require the specification of the 'formation of the conspiracy, the place and date of each defendant's entry into the conspiracy, . . . and specification of the manner in which the conspiracy operated would unduly restrict the government's proof at trial.'" *Young & Rubicam*, 741 F. Supp. at 349 quoting *United States v. McCarthy*, 292 F. Supp. 937, 940 (S.D.N.Y. 1968). *See Torres*, 901 F.2d at 233-34 (affirming denial of bill of particulars seeking date of defendant's entry in conspiracy); *United States v. Triana-Mateus*, 2002 WL 562649 at *5 (S.D.N.Y. 2002) (holding

a defendant is not entitled to "wheres, whens and with whoms" regarding conspiracy in a bill of particulars).

Further, "[a] defendant does not ordinarily need detailed evidence about a conspiracy to prepare for trial." *Bernard*, 1998 WL 241205 at *2; *see United States v. Urso*, 369 F. Supp. 2d 254, 272 (E.D.N.Y. 2005) ("As a general rule, a defendant is not entitled to receive details of the government's conspiracy allegations in a bill of particulars."); *Nicolo*, 523 F. Supp. 2d at 317. Requiring the government to provide a bill of particulars specifying information like when a conspiracy was formed, the date on which each participant joined, and "the manner in which the conspiracy operated would unduly restrict the government's proof at trial." *Bernard*, 1998 WL 241205 at *2 (quoting *Young*, 741 F. Supp. at 349); *see Urso*, 369 F. Supp. 2d at 272.

Defendant's request for additional minute detail is likewise unwarranted. Courts have routinely denied requests for bills of particulars that seek the specifics of the overt acts that the government will prove were undertaken in furtherance of a conspiracy. *See United States v. Carroll*, 510 F.2d 507, 509 (2d Cir. 1975) ("There is no general requirement that the government disclose in a bill of particulars all the overt acts it will prove in establishing a conspiracy charge."); *United States v. Feola*, 651 F. Supp. 1068, 1132 (S.D.N.Y. 1987) ("It is well settled that defendants need not know the means by which it is claimed they performed acts in furtherance of the conspiracy nor the evidence which the Government intends to adduce to prove their criminal acts."); *Diaz*, 303 F. Supp. 2d at 89 (denying bill of particulars and recognizing general rule that a defendant is not entitled to obtain detailed information about a conspiracy by way of a bill of particulars); *Columbo*, 2006 WL 2012511 at *5 (citing cases); *Nicolo*, 523 F. Supp. 2d at 317; *Jimenez*, 824 F. Supp. at 363 (holding that the defendant's

request for "the 'whens' 'wheres' and 'with whoms' of acts and participation in the charged conspiracy" are "routinely denied").

Notwithstanding this general rule, as set forth below, the Indictment and other information the government has supplied to the defendant more than adequately explain the conspiracy count and the wire fraud and false statement allegations about which the defendant now claims to need a bill of particulars. As such, the defendant's request should be denied. *See United States v. Gall*, 1996 WL 684404 at *7 (D. Conn. Aug. 12, 1996) (Nevas, J.) (denying bill of particulars based on detail in indictment and other information available to the defendant).

Defendant's request for a bill of particulars, especially at this level of detail (*i.e.*, "the nature of any and all statements and/or events") is simply an effort to cabin the government's proof at trial. What the defendant seeks here is simply a recitation of the government's evidence in advance of trial. A bill of particulars is not proper to force the government to reveal "the precise manner in which a defendant committed the crime charged." *Jimenez*, 824 F. Supp. at 363; *see Diaz*, 303 F. Supp. 2d at 89 (bill of particulars not a tool for obtaining "an advance view of the government's evidentiary theory").

While there will no doubt be documents and testimony establishing what particular defendants did with respect to particular counts, as well as what they did to further the conspiracy, the defendant is simply not entitled to the level of specificity and exactness that he seeks. It is axiomatic that the government may not be compelled to provide a bill of particulars disclosing the precise manner in which the defendants committed the crime charged. *United States v. Conley*, 2002 WL 252766 at *4 (S.D.N.Y. 2002); *United States v. Perez*, 940 F. Supp. 540, 550 (S.D.N.Y. 1996); *Young & Rubicam*, 741 F. Supp. at 350. Moreover, a bill of

particulars is not appropriate to require the precise factual details, but it is also not appropriate with regard to the government's theory of the case. Indeed, "there is no requirement that the Government reveal the information at its command into a warp of fully integrated trial theory for the benefit of the defendant." *United States v. Boffa*, 513 F. Supp. 444, 485 (D. Del. 1980). *See United States v. Mayhew*, 337 F. Supp. 2d 1048, 1062-63 (S.D. Ohio 2004) (denying motion for bill of particulars with respect to government's theory of motive for kidnaping charge).

The ultimate test is whether the information sought in a bill of particulars is necessary to prepare a defense, avoid unfair surprise and plead double jeopardy, and not whether the information sought would merely be helpful. *See Bernard*, 1998 WL 241205 at *1; *Young & Rubicam*, 741 F. Supp. at 349.

What the defendant appears to be doing, if not seeking to freeze the government's case well before trial, is to request a bill of particulars as a discovery tool. He should not be permitted to do so. It is "well established that a bill of particulars is not to be used by the defendant as a discovery tool," *United States v. Fischback and Moore, Inc.*, 576 F. Supp. 1384, 1389 (W.D. Pa. 1983), and it does not permit a defendant "to 'obtain detailed disclosure of the government's evidence prior to trial.'" *United States v. Kilrain*, 566 F.2d 979, 985 (5th Cir. 1978).

In sum, the Indictment is sufficient in alleging the conspiracy and numerous overt acts in furtherance of the conspiracy. It precisely identifies numerous examples by date and property address in which defendant used his IOLTA account to fraudulently wire undisclosed funds to a company not disclosed to have any involvement in the transaction. The Indictment details examples of particular HUD-1s on which defendant made false statements and what

those statements were. The indictment describes defendant's particular role in the conspiracy as a whole, and describes generally how the scheme itself was arranged and how the execution of the scheme was done by use of the wires. This level of specificity along with the extensive discovery made available to the defense sufficiently notify the defendant of the charges he faces so he can prepare his defense and plead double jeopardy. Thus, a bill of particulars is unnecessary and his motion should be denied.

Conclusion

For these reasons, the United States respectfully requests that the Court deny the defendant's motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 21, 2010, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

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