



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

PT:SPN/MKM/KDE

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 9, 2018

By ECF and Hand

The Honorable Pamela K. Chen
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Manuel Burga
Criminal Docket No. 15-252 (PKC) (RML)

Dear Judge Chen:

The government respectfully submits this letter in response to the Court's order dated December 28, 2017 directing the government to indicate whether it intends to dismiss the open counts in the first superseding indictment against defendant Manuel Burga. The government hereby moves to dismiss the first count of the first superseding indictment, which charges Burga with racketeering conspiracy, which was the only count on which he was extradited from Peru and therefore the only count on which he was tried.¹ The government does not intend to dismiss the remaining open counts against Burga in the first superseding indictment – specifically, Counts Nine and Ten, which charge Burga with wire fraud and money laundering conspiracies in connection with the Copa Libertadores tournament, and Counts Eighty-Three and Eighty-Four, which charge Burga with wire

¹ Burga was tried on Count One of the second superseding indictment, which charged him with the same racketeering conspiracy charged in Count One of the first superseding indictment.

fraud and money laundering conspiracies in connection with the Copa América and Copa América Centenario tournaments.

Respectfully submitted,

RICHARD P. DONOGHUE
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cc: Bruce L. Udolf (by ECF)