

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

UNITED STATES OF AMERICA	:	Crim. No. 3:23-cr-26 (KAD)
	:	
v.	:	
	:	
GLENN OZTEMEL,	:	
	:	
<i>Defendant</i>	:	

NOTICE OF FILING (AGREED) PROPOSED ORDER OF FORFEITURE

On November 11, 2025, the government filed a Motion for Order of Forfeiture, which seeks a money judgment against Defendant Glenn Oztemel. ECF No. 416. The Defendant responded to the Forfeiture Motion on December 5, 2025, and the Court ordered the government to file a reply on December 23, 2025. ECF Nos. 424, 433.

The parties have reached an agreement on an appropriate amount of forfeiture in this case, subject to the Court's entry of the attached proposed Final Order of Forfeiture—Money Judgment. *See Exhibit 1.* The proposed forfeiture amount is \$1,709,138, which is equal to the amount of U.S. dollar bribes paid to Rodrigo Berkowitz in connection with the charged scheme. *See GX 511.* The parties have agreed that the Defendant will pay the forfeiture amount to United States on the following schedule: (a) \$100,000 on or before February 9, 2026; (b) \$464,013 by June 10, 2026; and (c) the balance of the forfeiture amount within one calendar year of the entry of the proposed forfeiture order.

In light of the foregoing, the government respectfully requests that the Court grant the government's motion (ECF No 416), in part, and enter the agreed proposed order attached to this Notice. The Defendant does not object to the relief sought herein, and the parties agree that this agreement is without waiver of the Defendant's appellate rights. Accordingly, as indicated in the proposed order filed herewith, in the event that the Court of Appeals for the Second Circuit

vacates or reverses the Defendant's conviction and such decision results in the forfeiture order being vacated, the Defendant's payments toward this forfeiture money judgment shall be returned to his attorney(s) to be held in escrow pending further litigation in this matter.

Respectfully submitted,

DAVID X. SULLIVAN
UNITED STATES ATTORNEY
District of Connecticut

LORINDA LARYEA
ACTING CHIEF, FRAUD SECTION
Criminal Division
United States Department of Justice

/s/ Michael S. McGarry
Michael S. McGarry
Assistant United States Attorney

/s/ Allison L. McGuire
Allison L. McGuire
Clayton P. Solomon
Trial Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2026, 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.

/s/ Allison L. McGuire
Allison L. McGuire
Trial Attorney