

HAQJSEA1

Kalter - direct

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 UNITED STATES OF AMERICA,

4 v.

16 Cr. 467 ALC

5 NORMAN SEABROOK AND MURRAY HUBERFELD,

6 Defendants.

7 -----x

10 October 26, 2017
11 9:00 a.m.

13 Before:

14 HON. ANDREW L. CARTER, JR.,

15 District Judge
16 and a jury

18 APPEARANCES

19 JOON H. KIM,
20 United States Attorney for the
21 Southern District of New York

21 KAN MIN NAWADAY,
22 MARTIN S. BELL,
23 RUSSELL CAPONE,
24 Assistant United States Attorneys
25

HAQJSEA5

Rechnitz - direct

1 Government Exhibits 202 through 207, 209 and 210 into evidence.

2 THE COURT: That is in.

3 (Government Exhibits 1502, 202 through 207, 209 and
4 210 received in evidence)

5 MR. BELL: Your Honor, the government calls Jona
6 Rechnitz.

7 JONA SOLOMON RECHNITZ,

8 called as a witness by the Government,

9 having been duly sworn, testified as follows:

10 DIRECT EXAMINATION

11 BY MR. BELL:

12 Q. Good afternoon, Mr. Rechnitz.

13 A. Good afternoon.

14 Q. Where were you born?

15 A. Los Angeles, California.

16 Q. Where do you live now?

17 A. Los Angeles, California.

18 THE COURT: Let me ask the witness to lean into the
19 microphone so we can hear you. Can the jury hear okay? Keep
20 your voice up.

21 BY MR. BELL:

22 Q. I will try to lead by example, Mr. Rechnitz.

23 How old are you now?

24 A. I'm 34 years' old.

25 Q. Are you married?

HAQJSEA5

Rechnitz - direct

- 1 A. I am.
- 2 Q. Do you have children?
- 3 A. Yes.
- 4 Q. How many children do you have?
- 5 A. Five children.
- 6 Q. How would you describe your childhood, sir?
- 7 A. Happy childhood, I was blessed with two sets of
8 grandparents, great grandmother who was very involved with my
9 life growing up, good friends, nice family.
- 10 Q. And your parents?
- 11 A. My parents, yes, I was very close to my parents growing up
12 and still am.
- 13 Q. How would you describe the circumstances of your
14 upbringing?
- 15 A. Thank God I had a privileged childhood. I was able to
16 attend private school and went to summer camps, never had to
17 work to help out at home. Vacationed.
- 18 Q. What did your father do for a living?
- 19 A. Real estate, real estate developer.
- 20 Q. And your mother?
- 21 A. Interior decorator.
- 22 Q. What was the nature of your father's real estate business?
- 23 A. He did mixed used developments, residential and commercial
24 properties for the most part.
- 25 Q. Did you understand that business to be successful?

HAQJSEA5

Rechnitz - direct

1 A. Yes.

2 Q. By what measures was it successful?

3 A. People would seek his advice often. We were involved in
4 the community. I saw my family name in a lot of places of
5 importance.

6 Q. What did you understand your father's status within the
7 community to be?

8 A. Prominent.

9 Q. By what measures?

10 A. Again he would donate to a lot of causes. He was involved
11 with many organizations. He was involved in the community.
12 People would call him all the time for favors and help.

13 Q. How far did you get in school, Mr. Rechnitz?

14 A. Masters of science in business marketing through college.

15 Q. Where did get that degree?

16 A. Yeshiva University.

17 Q. Roughly when?

18 A. 2005 or 6.

19 Q. What did you do after you got that describe from Yeshiva
20 University?

21 A. I went on to the New York University School of Continuing &
22 Professional Studies, for a graduate certificate in real
23 estate.

24 Q. Did you finish that certificate?

25 A. No, I did not.

HAQJSEA5

Rechnitz - direct

1 Q. Did you do anything else at the same time that you were
2 pursuing that certificate?

3 A. Yes, I was working at Marcus and Millichap as broker's
4 assistant.

5 Q. What was Marcus and Millichap?

6 A. A real estate investment firm, a brokerage firm. I
7 represented buyers and sellers of real estate sales.

8 Q. What were your job responsibilities while you were a
9 broker's assistant?

10 A. Anything from pouring coffee to helping draft setups of
11 properties and cold-calling, just calling various landlords and
12 trying to get their business to sell their real estate.

13 Q. You mentioned setups before. What are those?

14 A. They're basically sheets that were sent out on a property
15 giving the description of the property with the for sale
16 information on it.

17 Q. How long did you have that job with Marcus and Millichap?

18 A. About a year.

19 Q. What did you do after that?

20 A. After that, I went on to work in an existing company Broad
21 Realty. I opened a Commercial Division called Broad
22 Properties.

23 Q. What was Broad Properties?

24 A. Broad Properties was the Commercial Division, the same
25 thing sort of Marcus and Millichap on a much smaller scale. I

HAQJSEA5

Rechnitz - direct

1 tried to start a new group within an existing company.

2 Q. What were your tasks as you tried to start that new group?

3 A. I had to build a team. I had to deal with some HR issues,
4 hire personnel, again cold call and try and get listings,
5 meaning try to get people to sell their real estate and
6 represent them so we can make commissions.

7 Q. How long did you have that job with Broad Properties?

8 A. About a year, I think.

9 Q. Mr. Rechnitz, how would you characterize your lifestyle at
10 that point in your career?

11 A. I was a newly-married couple. We were being supported by
12 my father and father-in-law. I had to submit a budget to them
13 basically showing all my expenses. They could figure out what
14 my experiences were. It was like a newly-married couple being
15 supported by parents.

16 Q. Did there come a time you left Broad Properties?

17 A. Yes.

18 Q. Approximately when?

19 A. I believe it was 2007.

20 Q. What did you leave Broad Properties to do?

21 A. I started working for a company called Africa Israel.

22 Q. What was Africa Israel?

23 A. Africa Israel was a publicly-traded company on the Tel Aviv
24 Stock Exchange which had a U.S. subsidiary called Africa Israel
25 USA, which was a real estate company.

HAQJSEA5

Rechnitz - direct

1 Q. Is it the subsidiary the entity you worked for?

2 A. Yes.

3 Q. What was the business of the subsidiary Africa Israel USA?

4 A. They were primarily residential luxury developers. They
5 also got a little bit into the commercial office business, but
6 they would buy trophy properties, very expensive properties
7 across New York.

8 They had a couple of investments in South Carolina and
9 Florida, but other than that, primarily in New York and a
10 little in California.

11 Q. From roughly when to roughly when did you work for Africa
12 Israel USA?

13 A. 2007 until the end of -- until 2011.

14 Q. What was your first job with Africa Israel USA?

15 A. I was assistant to the CEO.

16 Q. Who was the CEO?

17 A. Rotem Rosen.

18 Q. What were your responsibilities when you started out
19 working for Mr. Rosen?

20 A. So it was a very small office at the time. There were only
21 three or four of us, so we kind of did a little bit of
22 everything. I attended all the meetings or many important
23 meetings with the CEO. I would do anything from pour his
24 coffee, get his dry cleaning, to sitting with large developers
25 and negotiating deals and working on a lot of the paperwork

HAQJSEA5

Rechnitz - direct

1 that was necessary for deals.

2 Q. Was there a lot of copy work to do generally in New York
3 real estate?

4 A. I think so.

5 Q. Did you advance within that organization?

6 A. I did.

7 Q. What was your ultimate job, your final job with Africa
8 Israel USA?

9 A. I ended up being the director of acquisitions and
10 dispositions for the company.

11 Q. About when did you become director of acquisitions and
12 dispositions?

13 A. I think it was in 2009.

14 Q. What did that work involve?

15 A. I had the responsibility of selling the company's portfolio
16 as they were starting to liquidate a bit. The market had
17 crashed and they had paid high prices for the properties which
18 they've owned, and I was in charge of kind of selling the
19 properties and still looking for new opportunities, though most
20 of my efforts were focused on selling for the company.

21 Q. What sorts of connections did you make during your time at
22 Africa Israel USA?

23 A. Some very significant connections. We were a company that
24 had just spent several billion dollars in New York real estate.
25 I was the guy selling that product for less than our cost.

HAQJSEA5

Rechnitz - direct

1 There were a lot of people who sought after these properties,
2 and I was the guy they had to deal through, so I made some
3 significant relationships in who's who in real estate.

4 Q. Did there come a time when you left Africa Israel USA?

5 A. Yes.

6 Q. Approximately when?

7 A. 2011.

8 Q. Why did you leave?

9 A. Well, we were liquidating, we weren't buying, so I saw the
10 writing on the wall, I felt it was a good time for me to
11 establish my own firm and try and make my own success at that
12 point.

13 Q. Did you do that?

14 A. Yes.

15 Q. What was the firm that you started?

16 A. It is called JSR Capital.

17 Q. What did the JSR stand for?

18 A. The first initial of my name, J for Jona, S for Solomon, R
19 for Rechnitz.

20 Q. What was JSR Capital's primary day-to-day business?

21 A. Real estate development, investment, development and
22 management firm.

23 Q. What sort of real estate properties was JSR Capital
24 involved in in the first few years?

25 A. We bought a property in the Bronx, medical office building,

HAQJSEA5

Rechnitz - direct

1 small asset. I was very involved in a building called the
2 Apthorp, A P T H O R P, Condominium, it was a residential
3 luxury condo.

4 THE COURT: You have got to speak up. We have to make
5 sure the jury can hear. Lean into the microphone a little bit
6 more.

7 THE WITNESS: Better?

8 THE COURT: Yes.

9 A. Residential luxury condominium, which I was actively
10 involved in buying and selling apartments and syndicating deals
11 in that property.

12 I bought a property in East Village, two townhouses
13 which we turned into 33 rental units, bought a building on
14 Madison Avenue, later on bought a building in Brooklyn, had
15 some other assets.

16 Q. You have mentioned a number of locations, Mr. Rechnitz,
17 within New York City. Is it fair so say you were focused on
18 the New York market at that time?

19 A. Yes, at that point in my career.

20 Q. Why were you focused on the New York market at that point
21 as opposed to Los Angeles where you had grown up?

22 A. I was living here. That was the market I wanted to make my
23 own mark in and I wanted to try to do things on my own rather
24 than just move back and work for my family.

25 Q. What sort of volume of real estate did you do in your first

HAQJSEA5

Rechnitz - direct

1 three or four years at JSR?

2 A. Pretty significant. I believe I purchased over a hundred
3 million dollars worth of property.

4 Q. Can you give us a sense of some of the more prominent
5 properties JSR was involved in. You mentioned Apthorp?

6 A. The Apthorp property called 238 Madison, which is a mix use
7 property which has retail tenants on bottom, some restaurants
8 and has residential apartments on top. We purchased it
9 primarily as a development site for condos.

10 Also the East Village property was a nice deal. We
11 knocked down again two townhouses, built up a 33 rental,
12 residential rental property building. In Brooklyn we bought a
13 very prominent property in the heart of Borough Park, which is
14 pretty famous for that neighborhood.

15 Q. How were you able to obtain the capital to purchase those
16 properties?

17 A. I worked with investors. I syndicate my deals.

18 Q. When you say you syndicate your deals, Mr. Rechnitz, what
19 does that mean?

20 A. I usually put a little of my own money in, if any, and I
21 raise the rest from friends and family or outside investors.

22 Q. How involved was your father in that business in the early
23 years of JSR, if at all?

24 A. He was not, only if I called him for some advice.

25 Q. Why wasn't he more involved in that?

HAQJSEA5

Rechnitz - direct

1 A. Again I wanted to try to establish myself independently
2 from my father.

3 Q. Over the first four years or so of JSR Capital, would you
4 say the business was successful?

5 A. Yes.

6 Q. By what measures?

7 A. Whenever I'd get a new deal, it wasn't so hard for me to
8 raise the money from investors. That was a big indication for
9 me. I had been written up more positively than recently, but I
10 was written up when I purchased properties, would appear in the
11 real estate publications. I would be able to call many big
12 players in town, and they'd answer the call, so I measured the
13 success that way.

14 Q. So you mentioned you measured the success of these in part
15 in terms of positive press, in terms of being written up. Why
16 was that important?

17 A. Because that's the way I believed at the time that the
18 world works, if you see your name in press and see it in print,
19 you must be doing well. If it he says he bought this building
20 and that building, people like to bet on a winner. If I go to
21 a meeting and show an article I was just written up, it says a
22 lot.

23 Q. Just to be clear, why was being a winner sort, bet on a
24 winner thing, why was being received as a winner important for
25 business?

HAQJSEA5

Rechnitz - direct

1 A. At the time it was very important to me to grow. I figured
2 it would take me to the next level. The more you buy, the more
3 money you make. If you have good investors and syndicate
4 deals, the more profit split you've got.

5 Q. What sort of charitable involvement did you have at this
6 point?

7 A. I had been involved in many charities in my local community
8 and abroad. I was very young when I was honored by an
9 organization on a major platform, received an award with
10 Governor Cuomo was there. In hindsight, I was too young for
11 that, but that is something I did again which I felt advanced
12 my career.

13 Q. How at all did this sort of specter of charity advance your
14 career?

15 A. There were a lot of people at dinner, a lot of
16 advertisements in the paper that showed my picture, had a nice
17 bio about me and a movie. I had fancy offices at the time that
18 were videoed for the dinner. Again marketing.

19 Q. How important were the connections you had made at African
20 Israel at this stage of your career?

21 A. They were significant.

22 Q. How were they significant?

23 A. First of all, some of the connections I made ended up
24 investing with me. There are attorneys I met through that that
25 worked there. I definitely knew a lot of more brokers in the

HAQJSEA5

Rechnitz - direct

1 marketplace that took me very seriously because I was the guy
2 who was at Africa Israel dealing with them. They felt I dealt
3 with them. It was some beneficial to my business.

4 Q. Now, are you familiar with an individual named Jeremy
5 Reichberg?

6 A. I am.

7 Q. Who was Jeremy Reichberg?

8 A. Jeremy was a friend of mine who I met as he was a police
9 liaison.

10 MR. BELL: I would like to publish perhaps just for
11 the witness --

12 MR. MAZUREK: No objection.

13 MR. SHECHTMAN: No objection.

14 (Multiple voices)

15 THE COURT: It is in.

16 (Government Exhibit 714 received in evidence)

17 BY MR. BELL:

18 Q. Mr. Rechnitz, your screen is working, right?

19 A. Yes.

20 Q. Can you see the individual depicted in what is in as
21 Government Exhibit 714?

22 A. I do.

23 Q. Who is that, sir?

24 A. Jeremy Reichberg.

25 Q. When did you first meet Jeremy Reichberg?

HAQJSEA5

Rechnitz - direct

1 A. I think I met Jeremy in around 2008 or 2007.

2 THE COURT: Continue to lean into the microphone.

3 THE WITNESS: 2008 or maybe 2007.

4 BY MR. BELL:

5 Q. Volume-wise that is perfect. Thank you.

6 How was it that you came to meet Mr. Reichberg?

7 A. A mutual friend introduced us.

8 Q. What were the circumstances of the introduction?

9 A. So this friend of mine who I was dealing with in Africa
10 Israel had a special license plate on his car that said,
11 "Sheriff."

12 When he came to meet me, he would park wherever he
13 wanted, and that is something I thought was pretty cool. It is
14 annoying to park in the city. I said I kind of want one of
15 those, and he told me well, actually, there is a guy I want to
16 introduce you to. There is a dinner taking place soon at a
17 restaurant with the NYPD football team. A lot of the
18 higher-ups in the Police Department will be at that dinner, and
19 if you contribute to their cause, they'll recognize you and
20 you'll get to know them and it would mean a lot for you.

21 So I arranged a donation, I think I gave \$5,000.00,
22 which is a significant amount of money, something I wanted
23 badly, and I went to the dinner and they presented me with a
24 plaque that said NYPD football team, had my name on it and I
25 started to get to know these guys a little bit and Jeremy.

HAQJSEA5

Rechnitz - direct

1 Q. Did you, in fact, meet Jeremy at that event?

2 A. Yes.

3 Q. Tell me about that meeting, what you remember of it.

4 A. He was very happy with the donation I gave. It made him
5 look good, made me look good, and we started to become friends
6 after that point.

7 Q. At that time what did you understand about Mr. Reichberg,
8 about who he was?

9 A. The liaison for NYPD.

10 Q. What did you that to mean?

11 A. I understood at the time he had an official position with
12 the New York Police Department as a liaison, go-between between
13 the Jewish community and the Police Department.

14 Q. Where did you understand Mr. Reichberg to live?

15 A. In Brooklyn, Borough Park.

16 Q. Did you develop a relationship with Mr. Reichberg?

17 A. I did.

18 Q. What was the appeal of getting to know Mr. Reichberg
19 better?

20 A. He had all these connections to police. At that point,
21 that was something that was very important to me. I didn't
22 know many people that had connections with police, growing up
23 in Los Angeles, and I thought this would be an awesome tool for
24 me personally and for my business.

25 Q. What were the reasons that you thought that getting to know

HAQJSEA5

Rechnitz - direct

1 somebody who knew the police would be useful to you?

2 A. Because people like access to things that they don't
3 normally get. I figured everybody always has an issue with
4 police, it could be a parking ticket, getting pulled over, it
5 could be needing security for something, and if I was the guide
6 they have to go through, that built a certain status and power
7 for me.

8 Q. Now, at the time that you met Mr. Reichberg, where were you
9 along the career path that we talked about before? Where were
10 you working?

11 A. I was rising, I was working for Africa Israel, one of the
12 more senior people there.

13 Q. Were there aspects of your job at Africa Israel that made
14 getting to know the police appealing?

15 A. Yes.

16 Q. What were those?

17 A. The chairman of the company of Africa Israel was privately
18 in the diamond business, and he had a store on Madison Avenue
19 that had a lot of protestors over the holidays, Valentine's Day
20 and other holidays, that would stand outside of his store and
21 disrupt customers from going inside.

22 This was a big headache for him, and the CEO of Africa
23 Israel wrote him and asked me if there is anything I can do
24 through the police. He felt they shouldn't be allowed to
25 protest outside of the business.

HAQJSEA5

Rechnitz - direct

1 So I brought it to the attention of Jeremy, and he
2 said, you know, there is definitely something we can do. Why
3 don't you get from the jewelry store a further donation for the
4 NYPD football team. I did. I think it was \$25,000, a huge
5 amount of money, and he said that he would make sure the
6 problem went away.

7 Q. Did anything come of that?

8 A. No.

9 Q. Now, did this relationship, this early relationship with
10 Mr. Reichberg turn into a lasting connection?

11 A. It did.

12 Q. Would you describe your relationship with Mr. Reichberg
13 over the first year or two.

14 A. Yeah, the relationship improved quickly. We would speak
15 often. We would check in probably daily or every other day,
16 and just issues always came up and he was always the guy to get
17 it done.

18 Q. Over that early period, what did you come to learn of the
19 relationships that Mr. Reichberg had with the NYPD officers?

20 A. He had very strong relationships. Even before I came into
21 the picture, I would say anybody who worked in his precinct
22 where he lives or Brooklyn South area was very tight with him.
23 He would call off and went to dinners together every so often.
24 He was on first-name basis with some of these guys.

25 Q. What sorts of things was Mr. Reichberg able to do with his

HAQJSEA5

Rechnitz - direct

1 police connections that you either witnessed or became aware
2 of?

3 A. First of all, he was able to arrange police escorts if we
4 ever wanted to get a ride in a cop car and beat traffic.

5 One time the chairman of Africa Israel was visiting
6 from Israel, and he landed on his private plane in Teterboro
7 Airport during rush hour. I called Jeremy and I said what can
8 we do because it would be good for me to impress this guy. And
9 Jeremy arranged for a private escort. We got to the Lincoln
10 Tunnel and one of the lanes completely blocked, and just the
11 chairman went to go through the lane by himself. He got to his
12 hotel in very short time period.

13 Q. Were you there at the time at the time this happened?

14 A. I was.

15 Q. Where were you within in the group that traveled through
16 the Lincoln Tunnel?

17 A. I rode in one of the cars. There were a couple of cars in
18 the entourage.

19 Q. What were you thinking, Mr. Rechnitz, as you rode through
20 the Lincoln tunnel unimpeded?

21 A. This is good, this will earn me a lot of points.

22 Q. Did you develop and understanding of how, of what sort of
23 mobilization of police efforts it took in order to shut down
24 that lane of the Lincoln Tunnel?

25 A. I realized it wasn't just going through one simple

HAQJSEA5

Rechnitz - direct

1 procedure because I remembered that the Port Authority which
2 controlled the area until the tunnel which is a shared police
3 responsibility between New York and New Jersey had taken us
4 until the tunnel and waived us off and a NYPD cop car met us
5 right when we left the tunnel. So it was a couple of different
6 hoops to go through.

7 Q. Now, what effects, if any, did your relationship with Mr.
8 Reichberg have on JSR Capital's real estate business as it
9 grew?

10 A. Well, again, there is a lot of people that I introduced him
11 to that I did business with that he helped out, so it was good
12 for me.

13 Q. What sort of help was Mr. Reichberg able to provide? Give
14 us an example or two.

15 A. If somebody had jury duty, he was able to somehow get them
16 off of that. If somebody got pulled over for a moving
17 violation, somehow he was able to handle that for them so that
18 they wouldn't get points on their license.

19 There were other small procedures, you know? A few
20 times friends of mine who had funerals, he arranged a police
21 escort to the cemetery and back, things of that nature.

22 Q. So what I want to do, Mr. Rechnitz, I want to direct your
23 attention now to about the middle of the year, early in the
24 year 2013. How had your relationship with Jeremy evolved
25 between that early point until 2013?

HAQJSEA5

Rechnitz - direct

1 A. We became very close. I even gave him space in my office
2 to conduct his business just to give him a place to go to every
3 day.

4 Q. By that time, Mr. Rechnitz, what did you understand that
5 business to be?

6 A. He had some expediting work he was doing for some of his
7 clients and people I referred him to. He was helping people
8 with some of the police stuff. Before meeting him, I
9 understood that he was somehow related to the diamond business,
10 but once I met him, the only business I saw was expediting and
11 police-related businesses.

12 Q. Mr. Rechnitz, you mentioned a couple of times there the
13 term expediting. For the uninitiated here, what did you
14 understand "expediting" to mean?

15 A. Basically when you want to build or you want to do some
16 construction to property in New York, you need to get the
17 proper permits in place, and some city agencies work very
18 slowly. So he claimed to know the commissioner and charge fees
19 to clients and got them approved on a much quicker basis than
20 it would have taken in the normal course without the
21 connections.

22 Q. Now, how did your relationship with the police evolve over
23 that same period of time?

24 A. Also we became one group. Jeremy, I would take him out for
25 dinner all the time and we would hang out often and we also

HAQJSEA5

Rechnitz - direct

1 became very friendly.

2 Q. When you say became very friendly with the police, what are
3 we talking about in terms of number of people, ranks?

4 A. The higher-ups in the Police Department, mostly chiefs and
5 inspectors and captains.

6 Q. What specific role, if any, did you have as compared to
7 Jeremy Reichberg when it came to dealing with the police?

8 A. Jeremy would deal with more of the details, if something
9 needed to be done, and I would be the guy to basically pay for
10 it. For example, if we wanted to go out for dinner, Jeremy
11 would make the arrangement, we would go, and I would pay.

12 If there were details to deal with in getting specific
13 tickets or whatever he needed to get rid of them, I would put
14 him in touch sometimes with people, and if money needed to be
15 paid, I would pay.

16 Q. What were the sorts of things you paid for for these police
17 at that point?

18 A. Dinners, meals, holiday gifts, things of that nature.

19 Q. Now, during the time that you -- you testified a moment ago
20 that you were able to put people in touch with Jeremy.

21 Did you understand that there were services that
22 Jeremy provided via the police or via the city that you weren't
23 involved in?

24 A. Can you please repeat the question.

25 Q. Sure. You testified a few minutes ago, Mr. Rechnitz, that

HAQJSEA5

Rechnitz - direct

1 you were able to get associates of yours, business associates
2 in some cases, favors via Mr. Reichberg. Were there
3 interactions of that sort that Mr. Reichberg had involving
4 people you didn't have -- business that didn't involve you?

5 A. Yes.

6 Q. Give me some examples of that.

7 A. He had people in and out of the office all the time that I
8 didn't recognize. He was carrying plans after meetings with
9 expediting, people who he told me he was working on cases for
10 them.

11 I didn't really get into the specifics of things that
12 didn't have to do with me, but he was constantly busy on the
13 phone with all different types of people.

14 Q. You mentioned meals and sporting events and the like with
15 police officials. Who did you and Mr. Reichberg get closest to
16 among the NYPD's friends?

17 A. James Grant was a very close friend, Eric Rodriguez, Jimmy
18 McCarthy, at one point Phil Banks, Michael Harrington, Andrew
19 Capool. David Colon was I think most of the people we became
20 friendliest with.

21 Q. Let me ask you about a number of those folks beginning with
22 I think you mentioned a Phil Banks. Who was he?

23 A. He was the chief of the NYPD.

24 Q. What did you understand that to mean?

25 A. He was the highest ranking uniformed officer in the New

HAQJSEA5

Rechnitz - direct

1 York Police Department.

2 Q. Did you come to develop an understanding of where his
3 offices were?

4 A. Yes.

5 Q. Where were his offices?

6 A. At 1 Police Plaza.

7 Q. There was also I think you made mention of someone named
8 James Grant?

9 A. Yes.

10 Q. Who was James Grant?

11 A. James Grant again was a friend who ended up becoming an
12 inspector in the Police Department. He had worked in Brooklyn
13 and now works -- well, worked in the Upper East Side.

14 Q. You also mentioned an individual named Michael Harrington.
15 Who was Mr. Harrington?

16 A. Yes, Mr. Harrington also was a friend who was the
17 right-hand man to Philip Banks.

18 Q. Did you have an understanding of what ranks or offices he
19 held?

20 A. He was a chief.

21 Q. You mentioned an individual named Eric Rodriguez. Who was
22 that?

23 A. Yes, I believe he also was a chief. He had worked in
24 Brooklyn, also just a friend.

25 Q. You mentioned, I believe, a McCarthy. Who was that?

HAQJSEA5

Rechnitz - direct

1 A. He was also a chief. He had worked in Queens and also was
2 a friend.

3 Q. You mentioned a Capool, I believe? Who was that?

4 A. Andrew Capool, I believe he was a chief. He was an
5 inspector when I met him. He also worked in Upper Manhattan,
6 was a friend as well.

7 Q. I believe that you also mentioned a David Colon. Who was
8 David Colon?

9 A. David Colon was a chief as well. He had worked in
10 Community Affairs with Phil Banks and in the Housing Division,
11 and he was a friend at that time.

12 Q. Did there come a time when you and Mr. Reichberg became
13 politically involved together?

14 A. Yes.

15 Q. How did that first happen?

16 A. So when Bill Thompson was running for mayor, we were
17 introduced to him through a friend named Fernando Mateo.

18 Q. Who was Fernando Mateo?

19 A. Fernando was a part owner of La Marina, which is a
20 restaurant on Dyckman in the Bronx, and he was a spokesperson
21 for the Hispanic Federation of Taxi & Limousine Drivers.

22 He was introduced to us by Chief Colon, and we met
23 with him. He was a mover and a shaker, and we decided to get
24 into the political game. We had the police going for us and
25 now it was time to get into politics.

HAQJSEA5

Rechnitz - direct

1 Q. When you say get into the political game, what were your
2 and Mr. Reichberg's goals at that point politically?

3 A. We'll fell into the whole concept of having power and
4 connections, and that was very important to me at that time.

5 Q. So I think you testified a moment ago that you met
6 Mr. Mateo when Bill Thompson was running for mayor?

7 A. Yes.

8 Q. What happened then?

9 A. I ended up donating the maximum that we were allowed to,
10 which was \$4,950.00 for me and for my wife as well, and then I
11 ended up bundling money for Mr. Thompson. We met him, which
12 means I reached out to friends and family to support his causes
13 as well, and we ended up raising a significant amount of money
14 for his campaign.

15 (Continued on next page)

16

17

18

19

20

21

22

23

24

25

HAQPSEA6

Rechnitz - Direct

1 Q. And you mentioned that you bundled money, I think you've
2 actually just explained that, but just to be clear, what's
3 bundling?

4 A. Again, bundling is where I get the credit for bringing a
5 big amount, a big chunk of money to the candidate, but I would
6 have to go out and raise that money from family and friends.

7 Q. What involvement, if any, did Mr. Mateo have with the
8 bundling and donating that you did?

9 A. So he was supposed to do it on his own, as well, but he was
10 also part of our group, and we were -- we had made it that we
11 would be one powerful group together, between him and us.

12 Q. So what happened after you donated to and bundled for
13 Mr. Thompson?

14 A. Unfortunately, he lost the primary.

15 Q. What happened after Mr. Thompson lost?

16 A. The winner, who was Bill de Blasio, was the new winning
17 horse, and Fernando came back to us and said: Guys, we've got
18 to continue. We built something strong here. I have an in
19 with Bill de Blasio. We're going to have respect. We're going
20 to have attention. Trust me, I've got the right guy. I'm
21 going to make a meeting. Let's get in.

22 Q. Now, to be clear, at this point, was the mayoral election
23 cycle still going on?

24 A. Yes.

25 Q. This was the 2016 cycle?

HAQPSEA6

Rechnitz - Direct

1 A. Yes.

2 Q. And what happened after Mr. Mateo talked up Mr. de Blasio
3 to you and Jeremy?

4 A. He arranged a meeting in my office with the head fund
5 raiser for Mayor de Blasio, named Ross Offinger.

6 Q. And what happened during that meeting with Ross Offinger?

7 A. Fernando, Jeremy and I met with Ross and said, we're one
8 group and we expect a lot of access and influence in the
9 office. We're going to become significant contributors, but we
10 want access. And when we call, we want answers. When we reach
11 out for things, we want them to get done. It was very
12 important and specifically stated at that meeting.

13 Q. After that was specifically stated in that meeting, what
14 was Mr. Offinger's response?

15 A. Okay. How much do you think you guys can get together?
16 And I had committed at that point, I think I said about 50 to
17 \$100,000.

18 Q. And did Mr. Reichberg and Mr. Mateo make commitments, as
19 well, or was that the group commitment? What else came out of
20 it?

21 A. That was my commitment with Jeremy, and Fernando had other
22 obligations and commitments to him, but Fernando was bringing
23 us to the table and sharing the credit of bringing us to the
24 table to Ross.

25 Q. Now, you mentioned that you wanted access. When were you

HAQPSEA6

Rechnitz - Direct

1 expecting to be able to cash in on that deal for access?

2 A. Could you please repeat the question?

3 Q. Sure. You said that you told Mr. Offinger, or that the
4 three of you told Mr. Offinger that you wanted access. Just to
5 be clear, when were you expecting that access to kick in?

6 A. From that moment until the mayor won and after the mayor
7 won.

8 Q. And so what sorts of benefits did you think that you would
9 be able to secure if and when Mr. De Blasio got elected?

10 A. My mind was limitless. Jeremy had told me in the days of
11 Giuliani, people made a fortune. I was focused on making
12 money, getting my name out there, becoming a big player in
13 town. So I figured maybe I'll buy an office building, and I'll
14 get the City as a tenant. Maybe I'll need to get special
15 permits to make residential developments. These types of
16 things occurred in my mind.

17 Q. What sorts of things, if there were any specific things,
18 did Mr. Reichberg speak to you about being able to do after the
19 election?

20 A. He told me that we would get on committees, we would get
21 prestige, people would have to go through him to get to the
22 mayor, and there's a lot of money to make doing that.

23 Q. What did you understand committees to refer to, sir?

24 A. The inauguration committee, the transition committee, and
25 there were other boards in New York that are prestigious

HAQPSEA6

Rechnitz - Direct

1 positions.

2 Q. Were those things appealing to you personally, as well?

3 A. Pardon?

4 Q. Were those things appealing to you personally, as well?

5 A. Yeah.

6 Q. Why?

7 A. Because. I'm in my late 20s or early 30s, and I'm going to
8 be on a board appointed by the mayor of New York. I thought
9 that was something to be proud of.

10 Q. Now, did Mr. Reichberg also discuss specific benefits that
11 you may be able to get in the future through your connections
12 with the NYPD?

13 A. Yes.

14 Q. What sorts of benefits were discussed?

15 A. Police chaplaincy.

16 Q. What did you understand a police chaplaincy to be?

17 A. That would be basically --

18 THE COURT: Again, just keep your voice up.

19 A. That's something which would give me a parking placard so I
20 could park where I wanted. You get a badge, if you get pulled
21 over. Things like that.

22 Q. Now, aside from the benefits that you've just articulated,
23 what did you understand a police chaplain to actually be?

24 A. A rabbi, a priest.

25 Q. And were you a rabbi or a priest?

HAQPSEA6

Rechnitz - Direct

1 A. No.

2 Q. To your knowledge, was Mr. Reichberg?

3 A. No.

4 Q. What was the reason why you and Mr. Reichberg were
5 discussing chaplaincy, despite your lack of a religious title?

6 A. Because it's something that we wanted.

7 Q. Now, did there come a time over that electoral cycle where
8 you developed a relationship with -- well, withdrawn.

9 What fund-raising did you actually do for the
10 de Blasio campaign over the remainder of 2013?

11 A. I think that we raised Mayor de Blasio the hundred thousand
12 that was promised.

13 Q. And how did you go about doing that?

14 A. Again, I gave the maximum of 4,950, my wife did, and then
15 we went to bundle the rest of the money.

16 Q. In the same way that you had for Mr. Thompson?

17 A. Yes.

18 Q. Did there come a time where you developed a relationship
19 with Candidate de Blasio himself?

20 A. Yes.

21 Q. Tell us about how that came to be.

22 A. Soon after I met Ross at the meeting, Bill de Blasio came
23 to my office, spent some nice time with me, gave me his
24 personal cell phone number on the back of his business card,
25 gave me his personal e-mail address, told me to call if there's

HAQPSEA6

Rechnitz - Direct

1 anything I need, always be in touch, and he really appreciated
2 my support and friendship.

3 Q. Did you, in the months that ensued, in fact, keep in touch
4 with Mr. de Blasio?

5 A. Yes.

6 Q. In what ways and to what degree?

7 A. I called his cell phone often.

8 Q. About how often would you say over the course of the
9 campaign?

10 A. At least once a week, if I have to guess.

11 Q. What would you talk about?

12 A. Different issues in the city. If he Winns, who he should
13 be appointing for certain positions, just talking and getting
14 to know one another. I e-mailed him on his personal e-mail.
15 We would chat. I'd go to events of his. He invited me to
16 events and put me in very good-seated areas.

17 Q. Would he pick up the phone?

18 A. Yes.

19 Q. Return calls?

20 A. Yes.

21 Q. Return e-mails?

22 A. Yes.

23 Q. During the campaign itself, did you ask Mr. de Blasio for
24 things going forward?

25 A. Yes.

HAQPSEA6

Rechnitz - Direct

1 Q. What sorts of things did you ask for before the campaign
2 was concluded?

3 A. I asked to be on a committee when he would win mayor, the
4 transition committee, and he said he would get back to me or
5 Ross would get back to me. Sorry, was your question before he
6 was mayor?

7 Q. Yes. Yes, it was.

8 A. So that was the only thing before he was mayor.

9 Q. I imagine that the election happened at one point,
10 Mr. Rechnitz. How did the election work itself out?

11 A. He won. He's the mayor of New York.

12 Q. Were you, in fact, able to get on those committees?

13 A. He put me on his inauguration committee.

14 Q. What is it do you understand that to mean?

15 A. Just a prestigious title. We had one meeting at the
16 offices of Kramer Levin, where they spoke to us about the
17 inauguration and what it would be about.

18 Q. Did you do much of anything on that committee?

19 A. No.

20 Q. Did you have to?

21 A. No.

22 Q. In the weeks after Mr. de Blasio's electoral victory, what
23 sort of a relationship did you have with Mr. Offinger?

24 A. He would call whenever they needed money, or I would call
25 him whenever we had an issue.

HAQPSEA6

Rechnitz - Direct

1 Q. Let's take those one at a time. When he called, what was
2 the nature of your response?

3 A. I was the yes man. I always gave money, as long as I was
4 seeing him produce results.

5 Q. And what happened when you would call Mr. de Blasio in the
6 weeks when he was mayor elect?

7 A. He took my calls. I mean, we were friends.

8 Q. You mentioned that you got appointed to the inauguration
9 committee. What, if anything, happened with Mr. Reichberg
10 after the election?

11 A. He was appointed as well. I wanted to be on the transition
12 committee, but they didn't want to put Jeremy on; so I said,
13 then I'm not going to go on.

14 Q. Did you develop an understanding of why they didn't want to
15 put Jeremy in the transition committee?

16 A. They said that he was a name that was getting published in
17 the papers, and they wanted diverse criteria of individuals on
18 it, and that he didn't meet the criteria.

19 MR. BELL: Now, I want to publish and perhaps simply
20 offer Government Exhibit 702.

21 THE COURT: So are you offering it?

22 MR. BELL: One moment.

23 MR. SHECHTMAN: No objection, your Honor.

24 MR. MAZUREK: No objection, your Honor.

25 MR. BELL: I kind of figured. In that case, your

HAQPSEA6

Rechnitz - Direct

1 Honor, we offer 702.

2 THE COURT: Okay. It's in. You may publish that.

3 MR. BELL: Can we publish that?

4 THE COURT: Yes.

5 (Government's Exhibit 702 received in evidence)

6 THE COURT: Hold on. Does the jury have it?

7 MR. BELL: I think the speed is getting faster.

8 BY MR. BELL:

9 Q. Mr. Rechnitz, what are we looking here, at Government
10 Exhibit 702?

11 A. This was a photo that was taken at one of Bill de Blasio's
12 events.

13 Q. Can you walk us through who we see?

14 A. Fernando Mateo, Jeremy Reichberg, Mayor de Blasio and me.

15 Q. Now, after the election took place, to your knowledge, what
16 became of Mr. Offinger?

17 A. He was the head fund raiser for Mayor de Blasio.

18 Q. And did he, in fact, have the sort of pull within City Hall
19 that you hoped for?

20 A. Yes.

21 Q. How did you come to realize that?

22 A. Whenever we would call him for access or for a favor, we
23 were getting the response that we expected and the results we
24 were expecting.

25 Q. What sorts of things did you call for for Mr. de Blasio

HAQPSEA6

Rechnitz - Direct

1 just in the weeks after the election?

2 A. Over time, after he won.

3 Q. After he won, then going into 2014, what sorts of things
4 did you call Mr. Offinger for?

5 A. Many things. There was a property in Ocean Parkway, which
6 a friend of mine owned, and he called me to tell me that they
7 tried to sell the building previously, but there was a local
8 police precinct that had previously identified that property as
9 a desirable property for the new precinct they were building.

10 And there's some law in this city that if a police
11 precinct designates your property, they kind of get a shot to
12 match whatever offer you have from a potential purchaser. And
13 they were in deep negotiations to sell that property and wanted
14 to make sure that -- they heard rumors that the Police
15 Department was interested in that property.

16 So I called Ross, and I told him to find out and to
17 get an immediate answer if this is a property that was on the
18 agenda of the Police Department.

19 My wife's cousin had a school in the east side, which
20 she was closing up at the end of the school year, and after
21 many years of occupying that property, she received a notice
22 that she had to close a month earlier due to some code
23 deficiency. And I had Jeremy deal with the details with Ross,
24 but it was very important to get them to delay the closing of
25 her school by a month.

HAQPSEA6

Rechnitz - Direct

1 I asked him to put a friend of mine on a committee for
2 the City of New York.

3 Q. What did you understand that to be, Mr. Rechnitz?

4 A. I don't understand your question.

5 Q. What did you understand the committee for the City of
6 New York, the entity you mentioned a moment ago, to be?

7 A. Some committee where he's a representative for the City of
8 New York.

9 Q. Okay.

10 A. A friend of mine had an issue with some water bill on a
11 property. Jeremy spoke to Ross about fixing that issue.

12 Important to me was, on one of my properties on
13 Madison Avenue, I had an issue. I was getting a lot of
14 violations from the city in reference to Airbnb. Airbnb is
15 basically when a landlord or a tenant rent out their apartment
16 on a nightly basis. So contractually, I had rented an
17 apartment to a tenant of mine. He was then renting it out on a
18 nightly basis and earning income.

19 The problem with that is if it's being operated as a
20 hotel, and I'm an apartment building, my building is not up to
21 code, for example not enough sprinklers, as if it was a hotel
22 use. And I was getting violations in the thousands of dollars,
23 and I didn't think that was fair. So I called Ross, and I told
24 him I wanted him to get me in front of the people who make
25 these decisions so that I don't have to keep paying these

1 expensive violations.

2 Q. Now, I want to direct your attention back to 2013 just for
3 a moment. Did you and Jeremy form similar relationships with
4 local politicians, other local politicians, with respect to
5 bundling and such?

6 A. Yes.

7 Q. Who else did you fund raise for?

8 A. We fund raised for --

9 THE COURT: Again, lean into that microphone.

10 A. We gave or -- well, we gave to Senatore Espaillat, some
11 local counsel people, and Rob Astorino.

12 Q. Who was Rob Astorino?

13 A. He was the county executive of Westchester County.

14 Q. And did you get to know him personally?

15 A. Yes.

16 Q. How were you introduced?

17 A. Fernando Mateo.

18 Q. Where did you first meet him?

19 A. In my office.

20 Q. And what happened during that meeting?

21 A. We met with Rob. Fernando lived in his district and
22 introduced us, told him that we're movers and shakers, and we
23 have the ability to financially back him. He had some talks at
24 that time that maybe he was one day going to run for Governor
25 and that it was a good guy to know.

HAQPSEA6

Rechnitz - Direct

1 And we met with him and Jeremy, or I told him of our
2 desire. We thought this was a good opportunity, that he could
3 appointment us maybe, or get us our chaplainship that we
4 desired, to become police chaplains for Westchester County.

5 Q. Now, to be clear, Mr. Rechnitz, where did you live at that
6 time?

7 A. Manhattan.

8 Q. Did you have anything to do with Westchester County?

9 A. No.

10 Q. To your knowledge, did Mr. Reichberg?

11 A. No.

12 Q. Was it your expectation that you'd be able to get
13 chaplains, notwithstanding that fact?

14 A. Yes.

15 Q. So what did Mr. Astorino say to you?

16 A. He said that he will talk to George Longworth, who is the
17 commissioner of the Police Department of Westchester County,
18 and that he would be in touch with us.

19 Q. What was your extent -- what was the extent of your
20 involvement in Mr. Astorino's fund-raising?

21 A. I raised some money for him, and I donated to him as well,
22 I think \$15,000, which is significant for a county executive
23 race.

24 Q. And did you, in fact, apply to become chaplain?

25 A. What do you mean apply?

HAQPSEA6

Rechnitz - Direct

1 Q. Well, did you become chaplain?

2 A. Yes.

3 Q. And what did that mean to you, becoming a chaplain?

4 A. It meant that I got my parking placard.

5 Q. Let me ask a better question. What did becoming chaplains
6 involve?

7 A. I didn't have to do anything.

8 Q. Now, other than fund raising, did you do other favors for
9 Mr. Astorino?

10 A. I did.

11 Q. Can you tell me about that?

12 A. Yes. He came to my office one day. He had known that my
13 office was on 47th Street, which is the heart of the Diamond
14 District and watches, and he brought me a picture of a watch
15 and asked me if I can find that watch for him, that he wanted
16 to buy it. It was a Rolex, and I told him I'm happy to give it
17 to him; he doesn't have to buy it.

18 And I called down to the -- to one of the stores that
19 I dealt with and asked them if they had the watch in stock and
20 how much it was. They said that they did, and I told him I
21 want to buy it for him, and he told me that he couldn't take it
22 as a gift. He had to pay something because that wouldn't be
23 allowed. It was a 7 to \$10,000 watch, if I remember correctly.
24 And I said: How much do you want to pay? And he said -- it
25 came out, either I told him or he told me, he paid one to

HAQPSEA6

Rechnitz - Direct

1 \$2,000, and I covered the rest of the watch.

2 Q. Now, during the time that you fund raised -- that you,
3 rather, Mr. Reichberg and Mr. Mateo fund raised for de Blasio
4 and Astorino, did you take any action to circumvent the
5 campaign contribution limits at that time?

6 A. I did.

7 Q. What did you do?

8 A. I worked with what's called straw donors.

9 Q. What did you do with straw donors?

10 A. A couple of people in my office, I had them write checks,
11 because I wasn't allowed to give more than 4950, and I
12 reimbursed them for those donations.

13 Q. How many times did you do that?

14 A. A handful.

15 Q. Did you get bundling credit for those donations?

16 A. I did.

17 Q. Was there a reason that you did that, other than the
18 bundling credit?

19 A. I did it for the credit. When I told Ross I'm going to
20 raise him a certain amount, I had a lot of pressure from him to
21 bring that amount in. So many times when he was even in my
22 office, I would tell them hold on. I would go and get a few
23 checks from people and then bring them in.

24 MR. BELL: Your Honor, I have about five minutes left
25 and I think we'll reach a logical break for the day. Is that

HAQPSEA6

Rechnitz - Direct

1 okay?

2 THE COURT: Yes. Go ahead.

3 MR. BELL: Thank you, your Honor.

4 BY MR. BELL:

5 Q. Mr. Rechnitz, I want to very briefly switch gears before we
6 conclude for the day. Are you testifying today pursuant to an
7 agreement with the government?

8 A. Yes.

9 Q. Pursuant to that agreement, have you pled guilty to any
10 crimes?

11 A. I have.

12 Q. What have you pled guilty?

13 A. To conspiracy to commit honest services fraud.

14 Q. At the time that you pled guilty to conspiracy to commit
15 honest services fraud, did you admit to certain conduct?

16 A. I did.

17 Q. And what kinds of conduct did you admit to?

18 A. Three buckets of conduct I admitted to.

19 Q. Tell us about the three buckets of conduct.

20 A. The first is buying gifts and giving gifts to public
21 officials and police in exchange for favors. The second one
22 was giving money to the mayor of New York in exchange for
23 favors. And the third was participating in a bribe scheme
24 between hedge funds and Norman Seabrook.

25 Q. And when you say participate in a bribe scheme, maybe it

1 makes sense to start with that bucket. What was it that you
2 actually did?

3 A. I introduced Norman to the hedge fund. I negotiated the
4 terms of the amount of money that Norman would be paid for
5 investing in that fund, and I physically paid him for that
6 investment.

7 Q. And when you say Norman, who are you referring to?

8 A. Norman Seabrook.

9 Q. Is Mr. Seabrook in the courtroom today?

10 A. He is.

11 Q. And can you identify him perhaps by location and an item of
12 clothing?

13 A. He is sitting in the second table in a gray suit.

14 MR. BELL: Your Honor, recognizing the defendant,
15 Mr. Seabrook.

16 THE COURT: Okay.

17 Q. Who else, other than you and Mr. Seabrook, was involved in
18 what you describe as that bribe scheme?

19 A. Murray Huberfeld.

20 Q. Who was he?

21 A. He was a friend of mine who was the head of the hedge fund.

22 Q. I'll just ask you to speak up, sir.

23 A. A friend of mine who was the head of the hedge fund.

24 Q. And what was Mr. Huberfeld's involvement in this scheme?

25 A. He was the one I negotiated with, and he is the one who

HAQPSEA6

Rechnitz - Direct

1 reimbursed me for the payment I made to Norman.

2 Q. Is Mr. Huberfeld in the courtroom today?

3 A. He is.

4 Q. And can you identify him by location and what he's wearing?

5 A. He's at the same table as Norman, in a navy suit.

6 MR. MAZUREK: So is mine.

7 Q. There are a number of navy suits there. Could you be a
8 little more specific there?

9 A. A striped navy, striped tie, white lines.

10 MR. BELL: Your Honor, identifying Mr. Huberfeld.

11 THE COURT: Okay.

12 Q. Now, with respect to that kickback conspiracy, can you tell
13 us what you specifically did in order to facilitate that bribe
14 scheme?

15 A. I made a cash payment of \$60,000 to Norman, and I was
16 reimbursed for laying out that money by Platinum with a fake
17 Knicks tickets invoice for \$60,000.

18 Q. How was the agreement behind the scheme reached?

19 A. Pardon?

20 Q. Was there an agreement in order for that payment to happen?

21 A. Yes.

22 Q. Who was the agreement between?

23 A. I was the middleman, go-between between Murray Huberfeld
24 and Norman Seabrook.

25 Q. And when you say you were the middleman, what do you mean

1 by that?

2 A. I'm the one who introduced them. I'm the one who
3 negotiated the amount that Norman would be paid from Murray,
4 and I'm the one who dealt with that aspect of their dealings
5 until investments were made.

6 MR. BELL: One moment, your Honor.

7 Q. You mentioned an entity called Platinum, what was that?

8 A. Hedge fund.

9 Q. And what did you understand Mr. Huberfeld's relationship to
10 the hedge fund to be?

11 A. The head of the fund, one of the partners.

12 Q. And, finally, Mr. Rechnitz, you mentioned that you and
13 Mr. Huberfeld had been friends. How far back did you know him?

14 A. Well, when I was a child, we often vacationed over the
15 holidays in similar places, but I really got to know him when I
16 was living in New York.

17 MR. BELL: Your Honor, that may be a logical place to
18 break for the day.

19 THE COURT: Okay. Members of the jury, we're going to
20 break for the day. Let me give you the usual instruction.
21 Again, do not read anything about this case. If you see
22 anything about this case in writing, stop reading it. Do not
23 listen to anything about this case. If you are to hear
24 anything over the radio or television or internet about this
25 case, stop listening.