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January 17, 2024

## **Electronically Filed**

Hon. Joan M. Azrack  
United States District Judge  
U.S. District Court, Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, NY 11722

Re: United States v. Cabasso et al.,  
19-Crim.-582 (JMA)

Dear Judge Azrack:

On January 12, 2024, the Court entered Preliminary Orders of Forfeiture against defendants Frances and Jack Cabasso, forfeiting, among other things, “an approximately seventy foot luxury recreational yacht, named ‘Tranquilo,’ registered in the name of Aventura Group, Inc., an entity owned and controlled by [FRANCES CABASSO] or [JACK CABASSO], bearing Hull Identification number XAX68S47C606 and U.S. Coast Guard number 1194245, seized on or about November 7, 2019, and all proceed traceable thereto” (See ECF Docket Entries 324 and 325).

This Firm represents Dr. Eric Weinstein, who, through his company I Shine Florida Yachting LLC (collectively, the “Claimants”), owns fifty percent of Aventura Group, Inc., the holding company that owns the Tranquilo Yacht. The government has been aware of the Claimants’ ownership interest in the Tranquilo Yacht for several years at this point; yet, for whatever reason, it did not fully inform the Court in its proposed Preliminary Order of Forfeiture that the Aventura Group, Inc. is not “owned and controlled” by the Cabassos but rather is 50 percent owned by Frances Cabasso through an LLC and 50 percent owned by the Claimants. Moreover, the government has allowed the boat to sit dormant, losing value, in government custody, all the while the Claimants have lost out on charter income from it. The Claimants have had no choice but to wait until an ancillary proceeding to secure its release. After waiting several years for this moment, Claimants hereby submit the attached Verified Claim. To be clear, Dr. Eric Weinstein, a dentist in New York, has had absolutely nothing to do with any criminal activity or the Cabassos, other than to have the misfortune of co-owning a boat with Mrs. Cabasso.

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More specifically and as set forth in more detail in the attached Verified Claim, by Corporate Resolution dated July 23, 2015, Sebastian Phillip Holding Company, LLC purchased a one hundred percent ownership in the Aventura Group, Inc., from Aventura Technologies, Inc., which is a defendant in the case. Aventura Technologies, Inc. no longer owns the Aventura Group, Inc., which Group's only asset had been the Tranquilo Yacht. Sebastian Phillip Holding Company, LLC is fifty percent owned by Claimant I Shine Florida Yachting, LLC. and fifty percent owned by 1 For Charters, LLC. Upon information and belief, 1 For Charters LLC is controlled and owned by Defendant Frances Cabasso. Claimant I Shine Florida Yachting is entirely owned and controlled by Claimant Dr. Eric Weinstein. Thus, 50 percent of the Tranquilo Yacht is owned by Dr. Weinstein through I Shine Florida Yachting, LLC, his company.

No other defendants in the case have any claim to the Tranquilo Yacht, and Claimants Eric Weinstein and I Shine Florida Yachting LLC hereby make a Verified Claim for the immediate return of their right, title, and interest in half of the Tranquilo Yacht. We hereby request that the Court order the immediate return of a 50 percent interest in the Tranquilo Yacht to Claimants.

Respectfully submitted,



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cc: All Parties (by ECF)