



U.S. Department of Justice

United States Attorney  
Southern District of New York

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

April 27, 2018

**BY ECF & EMAIL**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Grant, et al.  
S2 16 Cr. 468 (GHW)**

Dear Judge Woods:

The Government respectfully submits this letter in accordance with this Court's April 23, 2018 order for a bill of particulars.

First, the Government expects to introduce evidence at trial that the following individuals, not named in the Indictment, were members of the conspiracy:

Philip Banks III  
Michael Milici  
Stephen McAllister  
Michael Andreano  
David Colon  
Andrew Capul  
Eddie Gardiner  
Eric Rodriguez  
James McCarthy  
Brian McGinn

Second, the Government expects to introduce evidence at trial regarding the following specific official acts underlying Count One which were committed by or at the direction of co-conspirators other than James Grant or Michael Harrington (and notes its intent to prove an as-opportunities-arise conspiracy beyond the commission of the specific acts listed below):

- The promotion of James Grant to Deputy Inspector and to the command of the 19<sup>th</sup> Precinct in or around June 2014, influenced by Philip Banks as well as Michael Harrington;
- The promotion of Michael Milici to second grade Detective in or around September 2014, influenced by Philip Banks as well as Michael Harrington;

