



November 29, 2019

U.S. Department of Justice
Eastern District of Michigan
Suite 2001
211 W. Fort St.
Detroit, MI 48226-3211
Phone: (313) 226-9633
Fax: (313) 226-3561

Re: United States v. Defendant(s) Patricia E. Gray, Larry Holley
Case Number 2014R01546 and Court Docket Number 18-CR-20224

Dear

The enclosed information is provided by the United States Department of Justice Victim Notification System (VNS). As a victim witness professional, my role is to assist you with information and services during the prosecution of this case. I am contacting you because you were identified by law enforcement as a victim or potential victim during the investigation of the above criminal case.

Charges have been filed against defendant(s) Patricia E. Gray and Larry Holly. The prosecutors for this case are Anthony Vance and Ann Nee. The main charge is categorized as Other White Collar Crime/Fraud.

Victims of all crimes under federal investigation are entitled to services under the Victims' Rights and Restitution Act (VRRRA), including notification of court events. For further details, please refer to Title 34 United States Code section 20141 or the VRRRA link posted at <https://www.notify.usdoj.gov>.

Now that charges have been filed in federal court, victims of the charges filed are in addition, entitled to the following rights, according to the Crime Victims' Rights Act, Title 18 United States Code section 3771: (1) The right to be reasonably protected from the accused; (2) The right to reasonable, accurate, and timely notice of any public court proceeding, or any parole proceeding, involving the crime or of any release or escape of the accused; (3) The right not to be excluded from any such public court proceeding, unless the court, after receiving clear and convincing evidence, determines that testimony by the victim would be materially altered if the victim heard other testimony at that proceeding; (4) The right to be reasonably heard at any public proceeding in the district court involving release, plea, sentencing, or any parole proceeding; (5) The reasonable right to confer with the attorney for the Government in the case; (6) The right to full and timely restitution as provided in law; (7) The right to proceedings free from unreasonable delay; (8) The right to be treated with fairness and with respect for the victim's dignity and privacy; (9) The right to be informed in a timely manner of any plea bargain or deferred prosecution agreement; and (10) The right to be informed of the rights under this section and the services described in section 503(c) of the Victims' Rights and Restitution Act of 1990 (34 U.S.C. 20141(c)) and provided contact information for the Office of the Victims' Rights Ombudsman of the Department of Justice.

Please understand that these rights apply only to victims of the counts charged in federal court, and thus you may not be able to exercise all of these rights if the crime of which you are a victim was not charged. In any event, we will continue to provide you with notifications and services unless you tell us not to. We will make our best efforts to ensure you are provided the rights and services to which you are entitled. You may contact the Victim/Witness Coordinator at the office listed above if you have questions about the progress of your case, your rights or the services to which you are entitled, or how you can assert them during the proceedings. If you believe that a Justice Department employee has not provided you with these rights, you may file a

complaint with the Justice Department's Victims' Rights Ombudsman. For more information, go to <http://www.justice.gov/usao/resources/crime-victims-rights-ombudsman>. If you have questions about filing a complaint against an employee, you may contact the Ombudsman by email at usao.VictimOmbudsman@usdoj.gov. Questions concerning this case should be directed to the office listed above.

It is important to keep in mind that the defendant(s) are presumed innocent until proven guilty and that presumption requires both the Court and our office to take certain steps to ensure that justice is served. While our office cannot act as your attorney or provide you with legal advice, you can seek the advice of any attorney with respect to the rights above or other related legal matters.

Additionally, please be aware that most criminal cases are resolved by a plea agreement between the United States Attorney's Office and the defendant. You should also know that it is not unusual for a defendant to seek to negotiate a plea agreement shortly before a trial is scheduled to begin. Plea agreements can be made at any time and as late as the morning of trial, leaving little or no opportunity to provide notice to you of the date and time of the plea hearing. If the court schedules a plea hearing in this case, we will use our best efforts to notify you of available information as soon as practicable. If you want to inform the prosecutor of your views regarding potential plea agreements, or any other aspect of the case, please contact the prosecutor assigned to this case or me.

Due to the large number of victims identified in this case, we will do our best to provide you with written notification. In effort to assist victims more efficiently, a webpage has been developed which contains information relating to this case. This does not replace written notification, it simply provides an additional resource from which to obtain information. You may access this website at www.justice.gov/usao-edmi. Information contained under a navigation button titled *U.S. v. Larry Holley et al*, can be found in the right hand column of the webpage. You may also access information through the Victim Notification System (VNS) as described in the latter paragraphs of this letter.

Custody of a defendant during a federal criminal case is determined by the Court and is managed by the United States Marshal Service. Custody status of a defendant is subject to change during the course of the criminal proceedings. To receive the timeliest update to your case, please provide and verify your email address, as instructed below.

As of May 21, 2018, Larry Holley is not in the custody of the U.S. Marshal Service. The court, having reviewed the relevant information pertaining to the case, permitted the defendant to remain out of custody during the court proceedings.

As of May 21, 2018, Patricia E. Gray is not in the custody of the U.S. Marshal Service. The court, having reviewed the relevant information pertaining to the case, permitted the defendant to remain out of custody during the court proceedings.

On May 28, 2019, defendant Patricia E. Gray pled guilty to the charges listed below. Any remaining counts will be disposed of at the time of sentencing. As a result of the guilty plea, there will be no trial involving this defendant.

<u>Number of Charges</u>	<u>Description of Charge(s)</u>	<u>Disposition</u>
1	Attempt and conspiracy fraud	Guilty

On July 8, 2019, defendant Larry Holley pled guilty to the charges listed below. Any remaining counts will be disposed of at the time of sentencing. As a result of the guilty plea, there will be no trial involving this defendant.

<u>Number of Charges</u>	<u>Description of Charge(s)</u>	<u>Disposition</u>
1	Attempt and conspiracy fraud	Guilty

It is helpful for the Court to know the impact of this crime on its victims. In an effort to provide this information to the Court, we are enclosing a Victim Impact Statement. If you choose to complete a statement, please forward it to:

A Vance/S Palazzolo/S Holloway
United States Attorneys Office
Eastern District of Michigan
Suite 2001
211 W. Fort St.
Detroit, MI 48226-3211

This is one way the Court can hear your concerns as they relate to the crime. A United States Probation Officer may also contact you in an effort to obtain additional victim impact information. Victim impact information is generally not public information; however, under criminal law and procedures, all information contained in your questionnaire will be disclosed to the defendant and his attorney.

If you wish to complete a written victim impact statement, please return it to me or Sandy Palazzolo on or before Friday, December 20, 2019. Please return to the address listed above, or if you prefer, you may return it via email to sherri.holloway@usdoj.gov or sandy.palazzolo@usdoj.gov or fax to (313)226-3561.

The sentencing hearing for defendant(s), Larry Holley, has been set for **January 15, 2020, 2:00 PM** at Flint Courtroom, 600 Church Street, Flint, MI 48502 before Judge Laurie Michelson. You are welcome to attend this proceeding; however, unless you have received a subpoena, your attendance is not required by the Court. If you plan on attending, you may want to verify the date and time by using the VNS Call Center or website. If you are a victim of the charged offense(s) and wish to speak at sentencing, please call our office well in advance of the scheduled hearing date.

The sentencing hearing for defendant(s), Patricia E. Gray, has been set for **January 15, 2020, 3:00 PM** at Flint Courtroom, 600 Church Street, Flint, MI 48502 before Judge Laurie Michelson. You are welcome to attend this proceeding; however, unless you have received a subpoena, your attendance is not required by the Court. If you plan on attending, you may want to verify the date and time by using the VNS Call Center or website. If you are a victim of the charged offense(s) and wish to speak at sentencing, please call our office well in advance of the scheduled hearing date.

As part of the plea agreement, Larry Holley and Patricia Gray agreed to pay restitution to victims of the offense. A copy of the plea agreement can be found on the VNS website. Please be advised that if restitution is ordered by the Court in relation to the case being prosecuted by this office, it is the responsibility of the defendant to pay into the restitution fund. Restitution orders remain open for a period of twenty years upon the defendant's release from custody.

Please be advised that there is a separate Securities and Exchange Commission case that involves Larry Holley and Patricia Gray. In relation to that case, funds and assets relating to the defendants were seized. These assets are currently being held by the Court appointed receiver, Patrick O'Keefe and O'Keefe & Associates LLC. Disbursement of any funds held by the receiver will be made at a time deemed appropriate by him. This receiver was appointed by the Court in relation to the Securities and Exchange Commission case. The United States Attorney's Office has no involvement with that case, nor do we have an influence over the Court-appointed receiver.

Should you have any questions regarding disbursements of funds/assets which the receiver currently holds, please contact O'Keefe LLC directly at (248) 593-4810 or admin@treasurereceiver.com, or contact them through their website, www.treasurereceiver.com. Information from the receiver concerning the Securities and Exchange Commission case can also be found on that site.

A United States Probation Officer prepares a report for the Court and may contact you to discuss the impact the crime had on you financially, physically, and/or emotionally. If you are contacted, please make every effort to provide accurate and detailed information.

Because of the Court's schedule, hearing dates could change on very short notice. If you plan on attending, you may want to call the VNS Call Center or check the website to confirm the date and time. Please note, there is a 24-hour delay in information transfer to the website.

Through the Victim Notification System (VNS) we will continue to provide you with updated scheduling and event information as the case proceeds through the criminal justice system. You may obtain current information about this case on the VNS website at <https://www.notify.usdoj.gov> or from the VNS Call Center at 1-866-DOJ-4YOU (1-866-365-4968) (TDD/TTY: 1-866-228-4619) (International: 1-502-213-2767). In addition, you may use the Call Center or Internet to update your contact information and/or change your decision about participation in the notification program.

For many VNS registrants email will provide the most timely notification. VNS does not currently have an email address for you. You can provide VNS an email address by accessing the VNS Internet Web page using the login information provided below. By entering your email as part of the VNS registration process future notifications will be delivered by email, except in rare circumstances when you might also receive a letter from VNS. In order to continue to receive notifications, it is your responsibility to keep your contact information current.

You will use your Victim Identification Number _____ and Personal Identification Number (PIN) _____ anytime you contact the Call Center and the first time you log into VNS on the website. If you are receiving notifications with multiple victim ID/PIN codes please contact the VNS Call Center. In addition, the first time you access the VNS website, you will be prompted to enter your last name (or business name) as currently contained in VNS. The name you should enter is _____.

Remember, VNS is an automated system and cannot answer questions. If you have other questions which involve this matter, please contact this office at the number listed above.

Sincerely,

Sherri Holloway
Victim Witness Specialist

