

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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UNITED STATES OF AMERICA,)	
)	
	Plaintiff,)	
)	
	v.)	Civil Action No. 12-1298 (EGS)
)	
\$4,245,800.00 IN MUTILATED)	
UNITED STATES CURRENCY,)	
which has been submitted for redemption)	
by the United States Bureau of Engraving)	
and Printing in the District of Columbia)	
and associated items,)	
)	
	Defendant, and)	
)	
BANCO PIANO)	
)	
	Claimant.)	
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CLAIMANT BANCO PIANO S.A.’S VERIFIED CLAIM OF INTEREST

1. Pursuant to Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, Claimant, Banco Piano S.A. (“Claimant” or “Banco Piano”), by and through its counsel Steptoe & Johnson LLP, hereby files this verified claim and asserts its interest and right in the Defendant *in rem* in this action.
2. Banco Piano has a claim to, interest in, and right to the funds seized by the United States pursuant to the “Verified Complaint for Forfeiture *In Rem*” filed in this action under Title 18, United States Code, Sections 492 and 981 on August 6, 2012 for “\$4,245,800.00 in United States currency, which had been submitted for redemption by the United States Bureau of Engraving and Printing in the District of Columbia and associated items”

(referred to as the “Defendant Property”). Defendant Property is currently “in the custody of a United States government agency.”

3. The basis of Banco Piano’s interest in the property is as follows:

a. Claimant Banco Piano is a bank principally located in the Republic of Argentina.

As part of Claimant’s ordinary course of business, it purchases at a discount damaged foreign currency (US Dollars, Euros, British Pounds, and Brazilian Reais) and lawfully submits the damaged bills to the issuing governments for replacement. United States currency is the majority of this business, as the United States Dollar is a particularly prominent and stabilizing currency in the highly-volatile money market of Argentina. In the case of United States Dollars, damaged currency is submitted to the United States Bureau of Engraving and Printing in the District of Columbia for replacement. Since 1998, Banco Piano estimates that it has redeemed over twenty-five million United States Dollars through this process.

b. During the ordinary course of business Claimant lawfully submitted approximately ninety-five packages of mutilated United States currency to the United States Bureau of Engraving and Printing during the years 2010 and 2011. As alleged in the Complaint, Banco Piano made these submissions through Bank of America. Banco Piano retained ownership of the submitted currency at all times. A number of these packages, their particulars being set forth in the Complaint filed in this action at paragraph 2 (*see* below), have been sequestered by the United States government:

<u>Number</u>	<u>Submittal Date</u>	<u>Sub-package number</u>	<u>Redemption Value</u>
1(A). 1015693	August 23, 2010		\$384,700
2(B). 1016643	September 8, 2010		\$190,900
3(C). 1017817	September 27, 2010	OJO49819 (only)	\$268,900
4(D). 1019117	September 27, 2010		\$195,400
5(E). 1020620	October 14, 2010		\$148,100
6(F). 1100364	January 5, 2011	1A012530 (only)	\$483,000
7(G). 1101461	January 19, 2011		\$158,500
8(H). 1103881	February 22, 2011		\$443,500
9(I). 1105522	March 16, 2011		\$167,900
10(J). 1105711	March 18, 2011		\$92,500
11(K). 1108785	May 3, 2011		\$280,700
12(M). 1111101	June 6, 2011		\$95,700
13(N). 1111388	June 10, 2011		\$490,200
14(O). 1114317	June 19, 2011		\$292,900
15(P). 1112349	June 23, 2011	1FO45119 & 1FO45216 (only)	\$364,200
16(Q). 1118631	September 20, 2011		\$90,700
17(S). 1119653	October 12, 2011		\$98,000

4. Banco Piano lawfully submitted for redemption all of the currency subject of these proceedings and is the lawful owner of the Defendant Property. Banco Piano did not have any knowledge of, let alone participate in, any alleged money laundering or counterfeiting activity that could involve mutilated United States currency. As such, Banco Piano demands the return of its property and the right to defend this action.

Dated: October 18, 2012

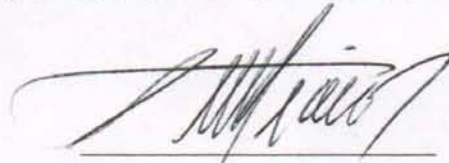
Respectfully submitted

/s/ Matthew J. Herrington
 Matthew J. Herrington (D.C. Bar 452364)
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Counsel for Claimant Banco Piano S.A.

VERIFICATION

I, Arturo Luis Piano, Director of Banco Piano S.A., hereby declare that I have read the foregoing verified claim. I verify and declare under penalty of perjury: (1) that the foregoing is true and correct; and (2) that I have been authorized by Banco Piano S.A. to execute this verification on its behalf. Executed this 17 day of October 2012, in Buenos Aires, Argentina.

A handwritten signature in black ink, appearing to read 'Arturo Luis Piano', written over a horizontal line.

Arturo Luis Piano

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of October 2012 a copy of the foregoing verified statement of interest was served on behalf of Banco Piano, via first-class mail upon:

Assistant United States Attorney Barry Wiegand
Office of the United States Attorney for the
District of Columbia
555 4th Street, NW
Washington, D.C. 20530

/s/ Matthew J. Herrington
Matthew J. Herrington