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December 19, 2025

BY ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Full Play Group, S.A.*
Docket No. 15-CR-252-31 (S-3) (PKC)

United States v. Hernan Lopez
Docket No. 15-CR-252-32 (S-3) (PKC)

Dear Judge Chen:

We represent GolTV, Inc. and its agent and affiliate, Global Sports Partners LLP (collectively, “GolTV”). On behalf of GolTV, we write in opposition to the Government’s letter motion dated December 9, 2025 to dismiss the third superseding indictment against defendants Full Play Group, S.A. and Hernan Lopez (Dkt. 2070).

GolTV was a victim of the wire fraud scheme of which the defendants were convicted. In that regard, the Government’s proof of trial established that a purpose of the defendants’ fraudulent scheme was to pay bribes to CONMEBOL officials in order to ensure that the broadcasting rights for the Copa Libertadores tournament would be awarded to Fox Sports Latin America, Ltd., instead of to GolTV. *See, e.g.*, Trial Tr. 4708:1-4755:3 (L. Bedoya Testimony), *and* 7190:4-7195:22 (Government summation). The loss of those broadcasting rights due to defendants’ corrupt payments caused GolTV to lose millions of dollars in potential revenue.

As a victim, GolTV has a right to be heard in connection with the Government’s motion to dismiss. *See* 18 U.S.C. § 3771; Fed. R. Crim. Pr. 60. Pursuant to that right, GolTV objects to the Government’s request for dismissal and disagrees that “dismissal of this criminal case is in the interests of justice.” After a lengthy trial requiring significant judicial resources, a jury found both these defendants guilty of serious crimes. Accordingly, GolTV respectfully submits that the

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interests of justice generally, and of the victims, in particular, dictate that the Court proceed to sentencing and impose appropriate punishment, including restitution, on each defendant.¹

Respectfully submitted,

/s/ Seth C. Farber

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cc: Counsel of record (by ECF)

¹ The reasons for the Government's highly unusual change of position are unknown. In that regard, GolTV notes that the Court has inherent authority to appoint an amicus curiae to consider this question and to present additional arguments in opposition to the Government's motion. See Order Appointing *Amicus Curiae*, *United States v. Flynn*, 17-cr-232 (EGS) (D.D.C.) (May 13, 2020) (Dkt. 205); John Gleeson, David O'Neil and Marshall Miller, *The Flynn case isn't over until the judge says it's over*, The Washington Post (May 11, 2020).