

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 13-cv-1832 (JDB)
)	
ALL ASSETS HELD IN ACCOUNT NUMBER)	
80020796, IN THE NAME OF)	
DORAVILLE PROPERTIES CORPORATION,)	
AT DEUTSCHE BANK INTERNATIONAL,)	
LIMITED IN JERSEY, CHANNEL ISLANDS,)	
AND ALL INTEREST, BENEFITS, OR ASSETS)	
TRACEABLE THERETO, <i>ET AL.</i> ,)	
)	
Defendants.)	
_____)	

**UNITED STATES’ MOTION FOR ENTRY OF DEFAULT
JUDGMENT AND FOR ORDER OF FORFEITURE AGAINST ASSETS IDENTIFIED IN
PARAGRAPHS 4(a), 4(b), 4(c), 4(d), 4(e), 4(f) AND 4(g) OF THE COMPLAINT**

COMES NOW, plaintiff, the United States of America, by and through its undersigned counsel, and respectfully moves for entry of a default judgment in plaintiff’s favor and for an order of forfeiture to the United States of the following defendant assets on the grounds set forth in the Verified Complaint for Forfeiture *In Rem*:

- (a) All assets held in account number 80020796, in the name of Doraville Properties Corporation, located at Deutsche Bank International Limited in the Bailiwick of Jersey, and all interest, benefits, or assets traceable thereto (“Defendant Asset A”)(identified in paragraph 4(a) of the Complaint);
- (b) All assets held in account number S-104460, in the name of Mohammed Sani, at HSBC Fund Administration (Jersey) Limited in the Bailiwick of Jersey, and all interest, benefits, or assets traceable thereto (“Defendant Asset B”)(identified in paragraph 4(b) of the Complaint);
- (c) All assets held in account number 223405880IUSD, in the name of Rayville

International, S.A., at Banque SBA in Paris, France, and all interest, benefits, or assets traceable thereto (“Defendant Asset C”)(identified in paragraph 4(c) of the Complaint);

(d) All assets held in account number 223406510USD, in the name of Standard Alliance Financial Services Limited located at Banque SBA in Paris, France, and all interest, benefits, or assets traceable thereto (“Defendant Asset D”)(identified in paragraph 4(d) of the Complaint);

(e) All assets held in account numbers 100130688 and 100138409, in the name of Mecosta Securities, at Standard Bank in the United Kingdom, and all interest, benefits, or assets traceable thereto (“Defendant Asset E”)(identified in paragraph 4(e) of the Complaint);

(f) All assets held at HSBC Life (Europe) formerly held in account number 37060762 in the name of Mohammed Sani at Midland Life International Limited, and all interest, benefits or assets traceable thereto (“Defendant Asset F”)(identified in paragraph 4(f) of the Complaint); and

(g) All assets in account number 38175076, in the name of Mohammed Sani, at HSBC Bank Plc., and all interest, benefits, or assets traceable thereto (“Defendant Asset G”)(identified in paragraph 4(g) of the Complaint).

The United States filed the Verified Complaint for Forfeiture *in Rem* on November 18, 2013, seeking the forfeiture of Defendant Assets A, B, C, D, E, F, and G, as well as four investment portfolios located in the United Kingdom, and five corporate entities registered in the British Virgin Islands. This Court issued arrest warrants *in rem* for all of the defendant assets on December 6, 2013. The Clerk entered orders of default against Defendant Assets A, B, C, D, E, F, and G on July 31, 2014. The United States now seeks to partially resolve this litigation by moving for a default judgment and an order of forfeiture against Defendant Assets A, B, C, D, E, F, and G, but not the four investment portfolios or five corporate entities. As grounds for its motion, the United States cites 18 U.S.C. § 983(a)(4)(A), Fed. R. Civ. P. 55, and Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

A proposed order accompanies this motion, as does a Memorandum of Law in support of it. As set forth more fully in that memorandum, there is no other party whose position to this motion

can be stated here.

WHEREFORE, the United States respectfully requests that the Court grant this motion and enter the attached proposed order.

Respectfully submitted,

JAIKUMAR RAMASWAMY, CHIEF
ASSET FORFEITURE AND MONEY
LAUNDERING SECTION

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UNITED STATES OF AMERICA

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 Plaintiff,)
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 ALL ASSETS HELD IN ACCOUNT NUMBER)
 80020796, IN THE NAME OF)
 DORAVILLE PROPERTIES CORPORATION,)
 AT DEUTSCHE BANK INTERNATIONAL,)
 LIMITED IN JERSEY, CHANNEL ISLANDS,)
 AND ALL INTEREST, BENEFITS, OR ASSETS)
 TRACEABLE THERETO, *ET AL.*,)
)
 Defendants.)
 _____)

Case No. 13-cv-1832 (JDB)

**MEMORANDUM OF LAW IN SUPPORT OF UNITED STATES’ MOTION FOR ENTRY
OF DEFAULT JUDGMENT AND FOR ORDER OF FORFEITURE AGAINST ASSETS
IDENTIFIED IN PARAGRAPHS 4(a), 4(b), 4(c), 4(d), 4(e), 4(f) AND 4(g) OF THE
COMPLAINT**

On November 18, 2013, the United States commenced this civil forfeiture action by filing a Verified Complaint for Forfeiture *in Rem* (the “Complaint”) against the following defendant property pursuant to 18 U.S.C. § 981(a)(1)(A):

(a) All assets held in account number 80020796, in the name of Doraville Properties Corporation, located at Deutsche Bank International Limited in the Bailiwick of Jersey, and all interest, benefits, or assets traceable thereto (“Defendant Asset A”)(identified in paragraph 4(a) of the Complaint);

(b) All assets held in account number S-104460, in the name of Mohammed Sani, at HSBC Fund Administration (Jersey) Limited in the Bailiwick of Jersey, and all interest, benefits, or assets traceable thereto (“Defendant Asset B”)(identified in paragraph 4(b) of the Complaint);

(c) All assets held in account number 223405880IUSD, in the name of Rayville International, S.A., at Banque SBA in Paris, France, and all interest, benefits, or assets

traceable thereto (“Defendant Asset C”)(identified in paragraph 4(c) of the Complaint);

(d) All assets held in account number 223406510PUSD, in the name of Standard Alliance Financial Services Limited located at Banque SBA in Paris, France, and all interest, benefits, or assets traceable thereto (“Defendant Asset D”)(identified in paragraph 4(d) of the Complaint);

(e) All assets held in account numbers 100130688 and 100138409, in the name of Mecosta Securities, at Standard Bank in the United Kingdom, and all interest, benefits, or assets traceable thereto (“Defendant Asset E”)(identified in paragraph 4(e) of the Complaint);

(f) All assets held at HSBC Life (Europe) formerly held in account number 37060762 in the name of Mohammed Sani at Midland Life International Limited, and all interest, benefits or assets traceable thereto (“Defendant Asset F”)(identified in paragraph 4(f) of the Complaint);

(g) All assets in account number 38175076, in the name of Mohammed Sani, at HSBC Bank Plc., and all interest, benefits, or assets traceable thereto (“Defendant Asset G”)(identified in paragraph 4(g) of the Complaint);

(h) All assets held in the name of Blue Holding (1) Pte. Ltd., on behalf of or traceable to Ridley Group Limited and/or the Ridley Trust, at J.O. Hambro Investment Management Limited in the United Kingdom, and all interest, benefits, or assets traceable thereto (“Defendant Asset H”)(identified in paragraph 4(h) of the Complaint);

(i) All assets held in name of Blue Holding (2) Pte. Ltd., on behalf of or traceable to Ridley Group Limited and/or the Ridley Trust, at J.O. Hambro Investment Management Limited in the United Kingdom, and all interest, benefits, or assets traceable thereto (“Defendant Asset I”)(identified in paragraph 4(i) of the Complaint);

(j) All assets held in the name of Blue Holding (1) Pte. Ltd., on behalf of or traceable to Ridley Group Limited and/or the Ridley Trust, at James Hambro & Partners LLP, in the United Kingdom, and all interest, benefits, or assets traceable thereto (“Defendant Asset J”)(identified in paragraph 4(j) of the Complaint);

(k) All assets held in of the name of Blue Holding (2) Pte. Ltd., on behalf of or traceable to Ridley Group Limited and/or the Ridley Trust, at James Hambro & Partners LLP, in the United Kingdom and all interest benefits, or assets traceable thereto (“Defendant Asset K”)(identified in paragraph 4(k) of the Complaint);

(l) Doraville Properties Corporation, a corporate entity registered in the British Virgin Islands, together with all its assets and all property traceable thereto (“Defendant Asset L”)(identified in paragraph 4(l) of the Complaint);

(m) Mecosta Securities, Inc., a corporate entity registered in the British Virgin Islands, together with all its assets and all property traceable thereto (“Defendant Asset M”) (identified in paragraph 4(m) of the Complaint);

(n) Rayville International, SA, a corporate entity registered in the British Virgin Islands, together with all its assets and all property traceable thereto (“Defendant Asset N”) (identified in paragraph 4(n) of the Complaint);

(o) Ridley Group Limited, a corporate entity registered in the British Virgin Islands, together with all its assets and all property traceable thereto (“Defendant Asset O”) (identified in paragraph 4(o) of the Complaint); and

(p) Standard Alliance Financial Services Limited, a corporate entity registered in the British Virgin Islands, together with all its assets and all property traceable thereto (“Defendant Asset P”)(identified in paragraph 4(p) of the Complaint).

As set forth in the Complaint, the defendant property was involved in an international conspiracy to launder proceeds of corruption in Nigeria during the military regime of General Sani Abacha. General Abacha, his son Mohammed Sani Abacha, their associate Abubakar Atiku Bagudu, and others embezzled, misappropriated, defrauded, and extorted hundreds of millions of dollars from the government of Nigeria and others. The conspirators transported and laundered the proceeds of those crimes through conduct in and affecting the United States and in violation of U.S. law. Because notice of this action was properly given to the public and known potential claimants as set forth in the Declaration of Notice and Publication (ECF No.50), and there is no claim to Defendant Assets A, B, C, D, E, F, or G, the United States respectfully asks that this Court enter the attached Default Judgment and Order of Forfeiture against Defendant Assets A, B, C, D, E, F, and G.

FACTUAL BACKGROUND AND PROCEDURAL HISTORY

a. Service of the Arrest Warrants *in Rem*

On Tuesday, February 25, 2014, the United States brought an action pursuant to Section 25 of the U.K. Civil Jurisdiction and Judgments Act, in the United Kingdom High Court of Justice,

Queen's Bench Division, Commercial Court seeking a freezing injunction to restrain Defendant Assets E, F, G, H, I, J, and K. Section 25 of the Civil Jurisdiction and Judgments Act provides the English Courts with the power to grant interim relief in support of civil proceedings in foreign courts. The U.K. action is ancillary to this *in rem* proceeding and was brought as a means to enforce this Court's arrest warrants *in rem*. The freezing injunction was granted, but has been challenged and remains in effect pending appeal.

On Wednesday, July 2, 2014, acting pursuant to a request of the United States made in accordance with the *Instrument between the United States and the United Kingdom*, signed December 2004, implementing the *Agreement on Mutual Legal Assistance between the United States and the European Union*, signed June 25, 2003, the United Kingdom National Crime Agency obtained a prohibition order enforcing this Court's arrest warrants *in rem* against Defendant Assets E, G, H, I, J and K. The prohibition order will take effect in the event that the freezing injunction granted in the U.K. action is dismissed voluntarily, or on appeal.

On Wednesday, February 26, 2014, acting pursuant to a request of the United States made in accordance with the *Treaty on Mutual Legal Assistance in Criminal Matters Between the United States of America and France*, U.S.-Fr., Dec. 10, 1998, S. TREATY DOC. NO. 106-17 (2000), as supplemented by the Instrument as contemplated by Article 3, paragraph 2, of the *Agreement on Mutual Legal Assistance Between the United States of America and the European Union* signed June 25, 2003, as to the application of the *Treaty on Mutual Legal Assistance in Criminal Matters Between United States of America and France* signed December 10, 1998, U.S.-Fr., Sept. 30, 2004, S. TREATY DOC. NO. 109-13 (2006), the Government of France seized Defendant Assets C and D.

On Wednesday, February 26, 2014, acting pursuant to a request of the United States made

in accordance with the *Criminal Justice (International Co-operation)(Jersey) Law, 2001*, and Article 2 of the *Civil Asset Recovery (International Co-operation) (Jersey) Law, 2007*, the Bailiwick of Jersey restrained Defendant Assets A and B.

b. Notice and Publication

Pursuant to Rule G(4)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, the United States sent direct notice of this action to the known potential claimants as set forth herein. The direct notice included copies of the Verified Complaint for Forfeiture *in Rem* (the “Complaint”), the relevant arrest warrants *in rem*, and a Notice of Complaint for Forfeiture (“Notice”).

The Notice contained detailed instructions advising potential claimants of the procedures required under Supplemental Rule G to file proper claims and answers. The Notice advised that verified claims needed to be filed within thirty-five (35) days of the date of the Notice, or for certain claimants, its receipt. The Notice also identified the contents of a verified claim required under Rule G(5)(a), and advised potential claimants of the need to file answers or Rule 12 motions within twenty-one (21) days after filing the verified claim.

The United States sought and obtained the assistance of the Government of Nigeria in providing notice of this action to potential claimants located in Nigeria pursuant to the *Treaty Between the Government of the United States of America and the Federal Republic of Nigeria on Mutual Legal Assistance in Criminal Matters*. See Treaty Doc. 102-2, 1989 U.S.T. Lexis 237. The Government of Nigeria delivered copies of the Notice, the Complaint, and arrest warrants *in rem* to Mohammad Sani Abacha on March 19, 2014; Dumez Plc., on March 20, 2014; and Abubakar Bagudu on March 24, 2014. The Government of Nigeria failed to date the Notice

document. However, it provided affidavits confirming the date the Notice, Complaint and arrest warrants were delivered.

On March 28, 2014, the Asset Forfeiture and Money Laundering Section of the Criminal Division of the United States Department of Justice sent the Notice for Ibrahim Bagudu, Blue Holdings (1) Pte. Ltd., and Blue Holdings (2) Pte. Ltd. (the “Blue Companies”), as well as the Complaint and arrest warrants *in rem* for Defendant Assets H, I, J, and K via electronic mail to Byrne and Partners LLP. Byrne and Partners LLP has represented the Blue Companies, Abubakar Bagudu, Ibrahim Bagudu, and Mohammad Abacha in proceedings involving the restraint of the defendant assets in the United Kingdom and/or the Bailiwick of Jersey contemporaneous with this civil forfeiture action. Additionally, as discussed in the United States’ Declaration of Notice and Publication, Abubakar Bagudu and the Blue Companies had actual notice of the U.S. forfeiture proceedings since at least March 25, 2014, and March 12, 2014, respectively (ECF No. 50, pages 4 and 5).

On April 16, 2014, the Asset Forfeiture and Money Laundering Section of the Criminal Division of the United States Department of Justice sent the Notice, Complaint and arrest warrants *in rem* to Doraville Properties Corporation; Rayville International, S.A.; Standard Alliance Financial Services Limited; Mecosta Securities Inc.; and the Ridley Group Limited via electronic mail to the corporations’ registered agents in the British Virgin Islands. The electronic mail message was followed by hard copies sent via the United States Postal Service which were delivered in the British Virgin Islands on May 8, 2014. The Notice advised that verified claims needed to be filed within thirty-five (35) days of the date the Notice was received.

Pursuant to Supplemental Rule G(4)(a), the United States must publish notice of this forfeiture action. Supp. R. G(4)(a). On March 6, 2014, the government began posting notice of this

forfeiture action on an official forfeiture internet site, <http://www.forfeiture.gov>, for 30 consecutive days. Pursuant to Supplemental Rule G(5)(a), any claimants to the defendant assets were required to file a claim no later than 60 days after the first publication of notice on the official government website. Thus, any verified claim in response to the notice by publication – other than from someone who received direct notice – had to be filed no later than May 5, 2014.

Accordingly, all process that was due was fully issued in this action and was returned according to law. All notice by publication and to all known potential claimants was properly given, as required by Supplemental Rule G(4).

c. All Claims to Defendant Assets A, B, C, D, E, F, and G Have Been Stricken

On April 17, 2014, Charles Lion Agwumezie filed a motion on behalf of Kenneth Nnaka, a Texas Attorney, for leave to appear *pro hac vice* in this matter (ECF No. 10). There were several documents attached to Mr. Agwumezie's motion. The first attachment was an unverified claim purportedly submitted on behalf of Nigeria (ECF No 10-1). The fifth attachment was a second motion, signed by Mr. Kenneth Nnaka, (not yet admitted to practice before this Court), seeking an extension of time to obtain the verification for this claim (ECF No. 10-5).

The second attachment to the *pro hac vice* motion was a claim submitted on behalf of Godson Nnaka (ECF No. 10-2). In the claim, Godson Nnaka purports to have a retainer agreement with Nigeria, and represents himself as an attorney-at-law (ECF No. 2, pages 3 and 6). However, Godson Nnaka was disbarred by the Maryland Attorney Grievance Commission on August 21, 2012.

On April 18, 2014, Mr. Agwumezie's *pro hac vice* motion was denied (ECF No. 12). The purported claims of Nigeria and Godson Nnaka were attached to this failed motion and were not docketed as claims in this action.

On April 22, 2014, Mr. Agwumezie again filed a motion for leave for Mr. Kenneth Nnaka to appear *pro hac vice*, as well as a motion for admission on behalf of Mr. Jude Ezeala. Neither motion was properly signed, and neither included any attachments. On April 25, 2014, this Court granted the *pro hac vice* motions on the condition that Mr. Kenneth Nnaka and Mr. Jude Ezeala submit signed declarations, which they did on May 7, 2014, and May 21, 2014, respectively.

On June 2, 2014, the United States filed an affidavit for default in this matter against Defendant Assets A, B, C, D, E, F and G because no party had filed a claim against these defendant assets, and the time to do so had expired (ECF No. 44). As set forth in the affidavit for default, Mr. Agwumezie, Mr. Kenneth Nnaka, Godson Nnaka, and Mr. Ezeala are not authorized to represent Nigeria in connection with this matter, or any other effort to recover the proceeds of Nigerian corruption in the United States (ECF No 44, page 7). The United States received this information directly from the Attorney General of Nigeria, Mr. Mohammed Bello Adoke, in person and by letter dated May 26, 2014, (ECF Nos. 44-1 and 51-1).

Ten days later, on June 12, 2014, Mr. Kenneth Nnaka and Mr. Ezeala filed a Motion for Enlargement of Time Within Which To File An Answer to Complaint For Forfeiture (ECF No. 45); Answer to Complaint, and Attached Claim (ECF Nos. 48 and 48-1); and Response to Plaintiff's Affidavit in Support of Default (ECF No. 47).

On June 27, 2014, the United States moved the Court to strike all claims filed by Mr. Kenneth Nnaka, Mr. Ezeala, Mr. Agwumezie and Mr. Godson Nnaka. The United States' motion was granted on July 3, 2014 and the claims were stricken from the record.

On May 1, 2014, ten individuals filed claims to Defendant Assets H, I, J, and K. No other claim to the defendant assets has been filed. Accordingly, there is no verified claim to Defendant Assets A, B, C, D, E, F, or G, and the time for filing a claim has expired. *See* 18 U.S.C. §

983(a)(4)(A)(claims due within 30 days after service of government's complaint or completion of publication notice); Supplemental Rule G(5)(verified claim deadline set within Notice of Forfeiture: deadline may occur 35 days after notice is sent and 30 days after publication notice completed); 18 U.S.C. § 983(a)(4)(A)(mandating the filing of a claim within 30 days of the service of the government's complaint). No pleadings remain filed in regard to, or on behalf of, Defendant Assets A, B, C, D, E, F, or G.

On July 31, 2014, the Clerk of the Court entered orders of Default in this matter against Defendant Assets A, B, C, D, E, F, and G (ECF Nos. 57-63). As a result, the entry of a default judgment and an order of forfeiture against Defendant Assets A, B, C, D, E, F and G are supported under the circumstances of this case. Indeed, the Clerk of the Court "must enter" the default when there has been a failure to plead timely or otherwise defend an action within the time fixed by law. Fed. R. Civ. P. Rule 55(a).

Whenever a judgment is sought for other than a sum certain from a defendant (for example, as in this Complaint), application for judgment by default shall be made to the Court, and such judgment may be entered by the Court so long as the defaulted party is not an infant or otherwise incompetent. See Fed. R. Civ. P. Rule 55(b); *DirectTV, Inc. v. Arnold*, 392 F. Supp.2d 415 (N.D.N.Y. 2005); *Canady, MD v. Erbe Elektromedizin GMBG*, 307 F. Supp.2d 2 (D.D.C. 2004); *United States v. Gant*, 268 F. Supp.2d 29 (D.D.C. 2003). Defendant Assets A, B, C, D, E, F, and G, are inanimate assets, so are neither infant nor incompetent. Further, no person believed to have an interest in Defendant Assets A, B, C, D, E, F or G is an infant, is incompetent, or is presently engaged in military service.

Accordingly, upon consideration of the record in this case, including a showing of compliance with applicable rules regarding service of process and notice by publication, and the

defaults having been entered by the Clerk of the Court, it is respectfully requested that this motion be granted. A proposed Default Judgment and Order of Forfeiture is attached to the motion.

WHEREFORE, the United States respectfully submits this memorandum in support of its motion that this Court enter a default judgment and enter an order of forfeiture against Defendant Assets A, B, C, D, E, F, and G.

Respectfully submitted,

JAIKUMAR RAMASWAMY, CHIEF
ASSET FORFEITURE AND MONEY
LAUNDERING SECTION

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Attorneys for Plaintiff
UNITED STATES OF AMERICA

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ALL ASSETS HELD IN ACCOUNT NUMBER)	
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**DEFAULT JUDGMENT AND ORDER OF FORFEITURE AGAINST
ASSETS IDENTIFIED IN PARAGRAPHS 4(a), 4(b), 4(c), 4(d), 4(e), 4(f) AND 4(g)
OF THE COMPLAINT**

This matter comes before the Court upon the United States’ Motion for Entry of Default Judgment and Order of Forfeiture, as well as the Memorandum of Law submitted in support of it. The Court has carefully reviewed the history of this case, which is a civil forfeiture action *in rem* against defendant assets involved in an international conspiracy to launder the proceeds of corruption in Nigeria during the military regime of General Sani Abacha.

On November 18, 2013, the plaintiff commenced this forfeiture action against the following defendant property by filing a Verified Complaint for Forfeiture *In Rem* (the “Complaint”), alleging that the following defendant property should be forfeited to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(a)(hereinafter the “defendant assets”):

- (a) All assets held in account number 80020796, in the name of Doraville Properties Corporation, located at Deutsche Bank International Limited in the Bailiwick of Jersey, and all interest, benefits, or assets traceable thereto (“Defendant Asset A”)(identified in paragraph 4(a) of the Complaint);
- (b) All assets held in account number S-104460, in the name of Mohammed Sani, at HSBC Fund Administration (Jersey) Limited in the Bailiwick of Jersey, and all interest, benefits, or assets traceable thereto (“Defendant Asset B”)(identified in paragraph 4(b) of the Complaint);
- (c) All assets held in account number 223405880IUSD, in the name of Rayville International, S.A., at Banque SBA in Paris, France, and all interest, benefits, or assets traceable thereto (“Defendant Asset C”)(identified in paragraph 4(c) of the Complaint);
- (d) All assets held in account number 223406510PUSD, in the name of Standard Alliance Financial Services Limited located at Banque SBA in Paris, France, and all interest, benefits, or assets traceable thereto (“Defendant Asset D”)(identified in paragraph 4(d) of the Complaint);
- (e) All assets held in account numbers 100130688 and 100138409, in the name of Mecosta Securities, at Standard Bank in the United Kingdom, and all interest, benefits, or assets traceable thereto (“Defendant Asset E”)(identified in paragraph 4(e) of the Complaint);
- (f) All assets held at HSBC Life (Europe) formerly held in account number 37060762 in the name of Mohammed Sani at Midland Life International Limited, and all interest, benefits or assets traceable thereto (“Defendant Asset F”)(identified in paragraph 4(f) of the Complaint);
- (g) All assets in account number 38175076, in the name of Mohammed Sani, at HSBC Bank Plc., and all interest, benefits, or assets traceable thereto (“Defendant Asset G”)(identified in paragraph 4(g) of the Complaint);
- (h) All assets held in the name of Blue Holding (1) Pte. Ltd., on behalf of or traceable to Ridley Group Limited and/or the Ridley Trust, at J.O. Hambro Investment Management Limited in the United Kingdom, and all interest, benefits, or assets traceable thereto (“Defendant Asset H”)(identified in paragraph 4(h) of the Complaint);
- (i) All assets held in name of Blue Holding (2) Pte. Ltd., on behalf of or traceable to Ridley Group Limited and/or the Ridley Trust, at J.O. Hambro Investment Management Limited in the United Kingdom, and all interest, benefits, or assets traceable thereto (“Defendant Asset I”)(identified in paragraph 4(i) of the Complaint);
- (j) All assets held in the name of Blue Holding (1) Pte. Ltd., on behalf of or traceable to

Ridley Group Limited and/or the Ridley Trust, at James Hambro & Partners LLP, in the United Kingdom, and all interest, benefits, or assets traceable thereto (“Defendant Asset J”)(identified in paragraph 4(j) of the Complaint);

(k) All assets held in of the name of Blue Holding (2) Pte. Ltd., on behalf of or traceable to Ridley Group Limited and/or the Ridley Trust, at James Hambro & Partners LLP, in the United Kingdom and all interest benefits, or assets traceable thereto (“Defendant Asset K”)(identified in paragraph 4(k) of the Complaint);

(l) Doraville Properties Corporation, a corporate entity registered in the British Virgin Islands, together with all its assets and all property traceable thereto (“Defendant Asset L”)(identified in paragraph 4(l) of the Complaint);

(m) Mecosta Securities, Inc., a corporate entity registered in the British Virgin Islands, together with all its assets and all property traceable thereto (“Defendant Asset M”)(identified in paragraph 4(m) of the Complaint);

(n) Rayville International, SA, a corporate entity registered in the British Virgin Islands, together with all its assets and all property traceable thereto (“Defendant Asset N”)(identified in paragraph 4(n) of the Complaint);

(o) Ridley Group Limited, a corporate entity registered in the British Virgin Islands, together with all its assets and all property traceable thereto (“Defendant Asset O”)(identified in paragraph 4(o) of the Complaint); and

(p) Standard Alliance Financial Services Limited, a corporate entity registered in the British Virgin Islands, together with all its assets and all property traceable thereto (“Defendant Asset P”)(identified in paragraph 4(p) of the Complaint).

Predicated on a showing of probable cause that the defendant assets are subject to forfeiture, this Court issued arrest warrants *in rem* for the defendant assets on December 6, 2013. This Court’s arrest warrants *in rem* have been enforced as set forth in the United States’ Return of Service for Warrants of Arrest *in Rem* Against Defendant Assets Identified in Paragraphs 4(a), 4(b), 4(c), 4(d), 4(e), 4(f), 4(g), 4(h), 4(i), 4(j), and 4(k) of the Complaint (ECF No. 56).

Pursuant to Rule G(4)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, the plaintiff gave direct notice of this action to the known potential claimants, informing them of the forfeiture action and

advising them that verified claims needed to be filed within thirty-five (35) days of the date of such notice, or its receipt.

The plaintiff also provided notification of this civil forfeiture action by publication pursuant to Rule G(4)(a)(iv) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. On March 6, 2014, the government commenced notification of this forfeiture action on an official forfeiture internet site, <http://www.forfeiture.gov>, for 30 consecutive days. Thus, any verified claim in response to notice by publication – other than from someone who received direct notice – had to be filed not later than May 5, 2014.

There are no claims to Defendant Assets A, B, C, D, E, F, and G, as all claims filed to these defendant assets have been stricken by this Court. This resulted in the entries of Default by the Clerk of this Court on July 31, 2014. The time for filing a claim has expired. *See* Supplemental Rule G(5)(a)(ii). Thus, the United States is entitled to a default judgment pursuant to Fed. R. Civ. P. 55, and an Order of Forfeiture against Defendant Assets A, B, C, D, E, F, and G.

Based on the Government's well-pleaded allegations in its Verified Complaint for Forfeiture *In Rem*, the Court finds that Defendant Assets A, B, C, D, E, F, and G were involved in transactions in violation of 18 U.S.C. §§ 1956 and 1957, or are traceable to such property. As such, Defendant Assets A, B, C, D, E, F, and G are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A). The Court finds that the Verified Complaint for Forfeiture *In Rem* states a factual and legal basis for forfeiture. In addition, the Court also finds that process was fully issued in this action with respect to the defendant assets and returned according to law. No response, answer, or defenses remain interposed and no opposition remains to the

Plaintiff's Motion for Entry of a Default Judgment and for Order of Forfeiture.

Based upon the foregoing and the entire record in this action, it is by the Court, on this _____ day of _____, 2014, hereby

ORDERED, that Plaintiff's Motion for Entry of a Default Judgment and Order of Forfeiture is **GRANTED**; and it is further

ORDERED, ADJUDGED, AND DECREED, that Defendant Assets A, B, C, D, E, F, and G (identified in paragraphs 4(a), 4(b), 4(c), 4(d), 4(e), 4(f), and 4(g) of the Complaint), are **HEREBY DECLARED FORFEITED TO THE UNITED STATES OF AMERICA**, and that title to Defendant Assets A, B, C, D, E, F, and G is vested in the United States of America, to be disposed of in accordance with law; and that no right, title, or interest in the defendant property shall exist in any other person; and it is further

ORDERED, that the Clerk of the Court may close this matter as to Defendant Assets A, B, C, D, E, F, and G.

IT IS SO ORDERED.

JOHN D. BATES
DISTRICT COURT JUDGE
UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA