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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

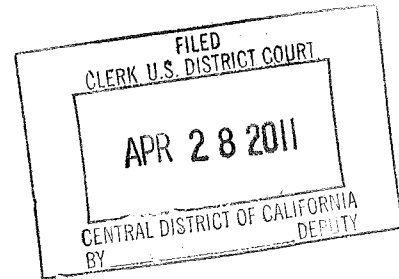
UNITED STATES OF AMERICA,

Plaintiff,

vs.

ONE WHITE CRYSTAL-COVERED "BAD  
TOUR" GLOVE AND OTHER MICHAEL  
JACKSON MEMORABILIA; ONE  
GULFSTREAM G-V JET AIRPLANE  
DISPLAYING TAIL NUMBER VPCES;  
REAL PROPERTY LOCATED ON  
SWEETWATER MESA ROAD IN MALIBU,  
CALIFORNIA; ONE 2007 BENTLEY  
AZURE; ONE 2008 BUGATTI VEYRON;  
ONE 2008 LAMBORGHINI  
MURCIELAGO; ONE 2008 ROLLS  
ROYCE DROPHEAD COUPE; ONE 2009  
ROLLS ROYCE DROPHEAD COUPE; ONE  
2009 ROLLS ROYCE PHANTOM COUPE;  
ONE 2011 FERRARI 599 GTO;

Defendants.



CV 11-03582 GW (SSx)

VERIFIED COMPLAINT FOR

FORFEITURE IN REM

28 JUDGED  
CLERK, U.S. DISTRICT COURT

APR 26 2011

CENTRAL DISTRICT OF CALIFORNIA

DEPUTY

1 Plaintiff United States of America, by and through its  
2 undersigned attorneys, in a case of forfeiture *in rem*, alleges  
3 that:

4 NATURE OF THE ACTION

5 1. This is an action *in rem* to forfeit approximately \$75  
6 million in real and personal property held for the benefit of  
7 Teodoro Nguema Obiang Mangue, the Minister of Agriculture and  
8 Forestry of Equatorial Guinea and the son of the President of  
9 Equatorial Guinea. This action is brought against property that  
10 was derived from extortion, bribery of a public official, or the  
11 misappropriation, embezzlement, or theft of public funds by or  
12 for the benefit of a public official, in violation of the law of  
13 Equatorial Guinea, and property that was involved in acts of  
14 money laundering, in violation of U.S. law. As property derived  
15 from a violation of foreign law, the defendants *in rem* are  
16 subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), and  
17 as property involved in a money laundering offense in violation  
18 of 18 U.S.C. §§ 1956 or 1957, the defendants *in rem* are subject  
19 to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A). The  
20 defendants *in rem*, obtained through the abuse of public office  
21 and illegally laundered through the abuse of financial  
22 institutions and businesses in the United States, are believed to  
23 be currently located within the Central District of California,  
24 with the exception of the defendant aircraft, which has  
25 previously been located within the Central District of California  
26 and is currently outside the United States, and all but one of  
27 the defendant vehicles, which are believed to have been exported  
28 from the Los Angeles area to Paris, France.

THE DEFENDANTS IN REM

One White Crystal-Covered "Bad Tour" Glove and Other Michael Jackson Memorabilia

2. The defendant White Crystal-Covered "Bad Tour" Glove and miscellaneous other Michael Jackson memorabilia are listed in Attachments A-1 and A-2. The items in Attachment A-1 are believed to be located at the defendant real property located on Sweetwater Mesa Road, Malibu, California, described below, and the items in Attachment A-2 are believed to be located at Rockin Boxes, 28337 Constellation Road, Santa Clarita, California.

One Gulfstream G-V Jet Airplane Displaying Tail Number VPCE

3. The defendant Gulfstream jet is a Gulfstream Aerospace model G-V aircraft purchased by Ebony Shine International Ltd., bearing manufacturer's serial number 669 and International Registration number VPCE (Cayman Islands), previously United States Registration Number N1UB, previously N544KK, its tools and appurtenances.

Real Property Located on Sweetwater Mesa Road, Malibu, California

4. The defendant real property, as more fully described in Attachment B, is titled in the name of Sweetwater Malibu, LLC, is located on Sweetwater Mesa Road, Malibu, California, and includes all appurtenances, improvements, and attachments thereon, as well as all leases, rents, and profits derived therefrom (hereinafter "Sweetwater property" or "defendant real property").<sup>1</sup>

Seven Luxury Vehicles

5. The defendant vehicles are described as follows:

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<sup>1</sup> Pursuant to Local Rule 79-5.4(e), home addresses have been omitted from this complaint.

- 1 a) One 2007 Bentley Azure, VIN SCBDC47L37CX12482, its  
2 tools and appurtenances;  
3 b) One 2008 Bugatti Veyron, VIN VF9SA25C18M795208, its  
4 tools and appurtenances;  
5 c) One 2008 Lamborghini Murcielago, VIN  
6 ZHWBU47S68LA02738, its tools and appurtenances;  
7 d) One 2008 Rolls Royce Drophead Coupe, VIN  
8 SCA2D68578UX16051, its tools and appurtenances;  
9 e) One 2009 Rolls Royce Drophead Coupe, VIN  
10 SCA2D68519UX16242, its tools and appurtenances;  
11 f) One 2009 Rolls Royce Phantom Coupe, VIN  
12 SCA3C67589UX32091, its tools and appurtenances;  
13 g) One 2011 Ferrari 599 GTO, VIN ZFF70RCA6B0176109,  
14 its tools and appurtenances.

15 6. Each of the defendant vehicles is titled in the name of  
16 Teodoro Nguema Obiang. The defendant Ferrari is believed to be  
17 located at the Sweetwater property, and the remaining defendant  
18 vehicles are believed to be located in Paris, France.

19 7. The following may have interests in the defendants *in*  
20 *rem*: Teodoro Nguema Obiang Mangue.

21 **JURISDICTION AND VENUE**

22 8. Plaintiff brings this action *in rem* in its own right to  
23 forfeit and condemn the defendant property. This Court has  
24 jurisdiction over an action commenced by the United States under  
25 28 U.S.C. § 1345, and over an action for forfeiture under 28  
26 U.S.C. § 1355(a).

27 9. This Court has *in rem* jurisdiction over the defendant  
28 property under 28 U.S.C. § 1355(b).

1           10. Venue is proper in this district pursuant to 28 U.S.C.  
2 §1355(b)(1) because the acts or omissions giving rise to the  
3 forfeiture occurred in this district, and pursuant to 28 U.S.C.  
4 § 1395 because the property is located in this district, with the  
5 exception of the defendant vehicles located in Paris, France, and  
6 the Gulfstream jet, which was previously located within the  
7 Central District of California as recently as February 28, 2011,  
8 but is currently believed to be located outside the United  
9 States. Venue as to the defendant assets located outside the  
10 United States is under 28 U.S.C. § 1355(b)(2).

11           11. The defendant real property has not been seized but is  
12 located within this district and within the jurisdiction of this  
13 Court. The United States does not request authority from the  
14 Court to seize the defendant real property at this time. The  
15 United States will, as provided by 18 U.S.C. §§ 985(b)(1) and  
16 (c)(1):

- 17           • Post notice of this action and a copy of the  
18           Complaint on the defendant real property.
- 19           • Serve notice of this action on the defendant real  
20           property's owner, and send such a notice to any  
21           other person or entity who may claim an interest  
22           in the defendant real property, along with a copy  
23           of this Complaint.
- 24           • If necessary, request and execute a writ of entry  
25           for purposes of conducting an inspection and  
26           inventory of the defendant real property, and  
27           • Record a *lis pendens* in the county records where  
28           the defendant real property is located,

1 identifying the defendant real property as a  
2 defendant in this action.

3 The United States will also, as provided in 19 U.S.C. § 1606,  
4 appraise the defendant real property.

5 **BASIS FOR FORFEITURE**

6 12. The defendant assets are subject to forfeiture pursuant  
7 to 18 U.S.C. § 981(a)(1)(C) because they are property  
8 constituting or derived from proceeds traceable to an offense  
9 constituting "specified unlawful activity." Specified unlawful  
10 activities are defined by 18 U.S.C. § 1956(c)(7) and include  
11 foreign offenses involving "extortion," "bribery of a public  
12 official, or the misappropriation, theft, or embezzlement of  
13 public funds by or for the benefit of a public official."

14 13. The defendant assets are also subject to forfeiture  
15 pursuant to 18 U.S.C. § 981(a)(1)(A) because they constitute  
16 property involved in a transaction or an attempted transaction in  
17 violation of section 1957 of Title 18, United States Code, or are  
18 property traceable to such property. Section 1957 prohibits the  
19 conducting of a financial transaction with property known to be  
20 the proceeds of unlawful activity with a value greater than  
21 \$10,000, i.e., the proceeds of a foreign offense involving  
22 extortion, bribery of a public official, or the misappropriation,  
23 theft, or embezzlement of public funds by or for the benefit of a  
24 public official. See 18 U.S.C. § 1956(c)(7)(B)(ii), (iv).

25 14. The defendant Gulfstream jet, real property, and  
26 memorabilia are also subject to forfeiture pursuant to 18 U.S.C.  
27 § 981(a)(1)(A) because they constitute property involved in a  
28 transaction or an attempted transaction in violation of section

1 1956 of Title 18, United States Code, or are property traceable  
2 to such property. Section 1956(a)(1)(B) prohibits the conducting  
3 of a financial transaction with property known to be the proceeds  
4 of unlawful activity with the intent to conceal the nature,  
5 location, source, ownership, or control of proceeds of a  
6 specified unlawful activity, *i.e.*, a foreign offense involving  
7 extortion, bribery of a public official, or the misappropriation,  
8 theft, or embezzlement of public funds by or for the benefit of a  
9 public official. See 18 U.S.C. § 1956(c)(7)(B)(ii), (iv).

#### 10 FACTS

11 15. On information and belief, plaintiff alleges the  
12 following facts.

#### 13 Background

14 16. Equatorial Guinea (hereinafter Equatorial Guinea or  
15 "EG") is a West African country with slightly less landmass than  
16 Maryland. The population in 2009 was approximately 680,000,  
17 according to data compiled by the World Bank.

18 17. The country was colonized by the Portuguese in the late  
19 1600s and ceded to Spain in 1778; it gained independence in 1968.  
20 The first President was Macías Nguema.

21 18. In 1979, Macías Nguema was overthrown in a coup d'état.  
22 Teodoro Obiang Nguema Mbasogo ("Obiang Mbasogo"), who was  
23 previously the military governor of Bioko and Vice-Minister of  
24 the Armed Forces, became President of Equatorial Guinea.

25 19. More than three decades after seizing control from his  
26 uncle Macías Nguema, President Obiang Mbasogo is still in power.

27 20. As President, Obiang Mbasogo exercises plenary control  
28 over the Government of Equatorial Guinea, including naming and

1 dismissing members of the cabinet at will, imposing laws by  
2 decree, dissolving the Chamber of Representatives at will,  
3 negotiating and ratifying treaties and calling legislative  
4 elections.

5 21. Government Ministers and members of President Obiang  
6 Mbasogo's family exercise substantial influence over the economy  
7 of Equatorial Guinea.

8 22. During President Obiang Mbasogo's more than thirty-year  
9 rule, government officials and members of the president's family  
10 have amassed extraordinary wealth through the misappropriation of  
11 Equatorial Guinea's natural resources, their control of  
12 government accounts and assets, and their association with  
13 President Obiang Mbasogo's power and influence. One such  
14 individual is Teodoro Nguema Obiang Mangue ("Minister Obiang  
15 Mangue"), the president's eldest son whom the president appointed  
16 Minister of Agriculture and Forestry in or before 2004. Minister  
17 Obiang Mangue is the owner of the defendant properties.

18 Embezzlement and Misappropriation of Equatorial Guinea's Natural  
19 Resources

20 23. Under Equatoguinean law the nation's mineral resources  
21 and hydrocarbons belong to the public, not to individuals.  
22 Similarly, Equatoguinean law provides that the National Forestry  
23 Reserve is permanent, inalienable, and part of the public domain,  
24 and that the National Forests are reserved for exclusive economic  
25 extraction and development by the State.

26 24. Since the commencement of large-scale exploitation of  
27 its oil reserves beginning in the mid-1990s, Equatorial Guinea  
28 has become a major oil and gas producer, becoming the third-



1 largest oil and gas producer in Sub-Saharan Africa in 2004. Over  
2 the last several years, oil and gas exports have resulted in  
3 billions of dollars in annual revenue.

4 25. Equatorial Guinea also derives income from natural  
5 resources other than oil, primarily timber, its second major  
6 export commodity.

7 26. As of 2006, the Equatoguinean economy had grown 20  
8 times larger than it was in the mid-1990s, reflecting the massive  
9 revenues derived primarily from oil and gas production. Despite  
10 this extraordinary expansion in the economy of Equatorial Guinea,  
11 living standards of the population remain at a subsistence level  
12 while the ruling family, including Minister Obiang Mangué, and  
13 their associates have gained significant wealth through  
14 misappropriation, theft and embezzlement of the nation's natural  
15 resources.

16 27. An investigation conducted by the Senate Permanent  
17 Subcommittee on Investigations (hereinafter "PSI") in 2004  
18 revealed evidence suggesting that oil funds were being  
19 misappropriated by government officials. From at least 1995 to  
20 2004, the Government of Equatorial Guinea directed that payments  
21 from oil companies be made into accounts at Riggs National Bank  
22 in Washington, D.C. Aggregate deposits to Equatoguinean  
23 government accounts totaled hundreds of millions of dollars at a  
24 time and were so large that by 2003, the Government of Equatorial  
25 Guinea was the largest client of the bank.

26 28. The Obiang family exercised sweeping control over the  
27 country's oil revenue, including an account at Riggs in the name  
28 of the Republic of Equatorial Guinea General Treasury that

1 received funds mostly from oil companies (the "oil account"). A  
2 withdrawal of funds from the oil account required only the  
3 signature of President Obiang Mbasogo and a second by either his  
4 son Gabriel Obiang Lima (then Deputy Mines and Hydrocarbons  
5 Minister) or his nephew Melchor Esono Edjo (Secretary of State  
6 for the Treasury).

7 29. Evidence uncovered in the PSI investigation reveals  
8 that any one of those same signatories also could withdraw funds  
9 from an EG money market account that was linked to two investment  
10 accounts in the name of the Republic of Equatorial Guinea for  
11 which the President was the only required signatory. These EG  
12 money market and investment accounts had combined balances of up  
13 to \$500 million.

14 30. During the same time period, President Obiang Mbasogo,  
15 other EG officials (including several who were relatives of  
16 President Obiang Mbasogo), and other family members maintained  
17 personal accounts at Riggs Bank in Washington, D.C.

18 31. Evidence uncovered in the PSI investigation reveals  
19 that these and other Riggs Bank accounts were used to receive and  
20 transfer the proceeds of misappropriation, embezzlement, and  
21 theft of public resources from Equatorial Guinea. For example,  
22 nearly \$500,000 was sent from the oil account to the personal  
23 bank account of Melchor Edjo, and nearly \$35 million was wire  
24 transferred from the oil account to two companies that were  
25 unknown to the bank and had accounts in jurisdictions with bank  
26 secrecy laws. When Riggs Bank tried to obtain information about  
27 the beneficial owners of these two companies, neither the banks  
28 holding the accounts nor Equatoguinean officials would provide

1 information.

2 32. The PSI also uncovered other evidence of widespread  
3 diversion of official Government funds to personal accounts of  
4 President Obiang Mbasogo and members of his family. In 1999,  
5 President Obiang Mbasogo created a Bahamas-registered corporation  
6 and opened a money market account at Riggs in the name of that  
7 corporation. From 2000 to 2002, \$11.5 million in cash was  
8 deposited into this account, often in million-dollar increments  
9 and packaged in unopened, plastic-wrapped bundles.

10 33. The President's wife also maintained personal accounts  
11 at Riggs, into which over \$1.4 million in cash was deposited from  
12 2000 to 2002.

13 34. Riggs Bank subsequently pleaded guilty to failure to  
14 report suspicious monetary transactions by high-risk customers  
15 and agreed to a \$16 million fine, in addition to a \$25 million  
16 civil money penalty, for its handling of the Equatoguinean and  
17 other accounts.

18 35. Following release of the report of the Senate Permanent  
19 Subcommittee on Investigations ("Riggs report") in 2004, the EG  
20 Government took cosmetic steps to improve its public image, but  
21 failed to enact reforms to curb the types of abuses identified in  
22 the Riggs report.

23 **Minister Obiang Mangué's Illicit Acquisition and Misuse of Funds**

24 36. Minister Obiang Mangué has used his position and  
25 influence to acquire criminal proceeds through corruption, abuse  
26 of office and money laundering in violation of Equatoguinean and  
27 U.S. law.

28 37. As Minister of Agriculture and Forestry, Minister

1 Obiang Mangué exercises control over the ministry that regulates  
2 the commercial extraction of forestry products, Equatorial  
3 Guinea's second largest export commodity. Although EG law  
4 prohibits public officials from intervening in businesses and  
5 associations in their area of responsibility, Minister Obiang  
6 Mangué controls companies heavily involved in commercial forestry  
7 in Equatorial Guinea, e.g., Grupo Sofona and its affiliate,  
8 Somagui Forestal. Minister Obiang Mangué has used money from  
9 accounts in the name of Somagui Forestal for purchases of  
10 expensive personal items, including some of the defendant assets.

11 38. As a government minister and through his relationship  
12 with his father and other family members with direct control over  
13 the extraction of oil, natural gas, and other mineral wealth,  
14 Minister Obiang Mangué exercises access to and control over  
15 public money and resources. For example, in an attempt to  
16 purchase a \$40 million luxury aircraft for personal use in 2005,  
17 Minister Obiang Mangué advised the manufacturer that he could  
18 have a U.S. oil company operating in Equatorial Guinea assume  
19 responsibility for making the payments for his personal jet.

20 39. Minister Obiang Mangué has held the position of  
21 Minister of Agriculture and Forestry since being appointed by his  
22 father in or before 2004 and in that capacity currently earns the  
23 equivalent of approximately \$6,799 per month.

24 40. Nevertheless, Minister Obiang Mangué has spent and  
25 continues to spend tens of millions of dollars on luxury items in  
26 a manner grossly disproportionate to his modest government  
27 income. Minister Obiang Mangué maintains an opulent lifestyle,  
28 making extravagant expenditures of many millions of dollars on

1 costly homes, cars, boats, aircraft, and other items in the  
2 United States and around the world.

3 41. Some, but not all, of Minister Obiang Mangué's lavish  
4 purchases are set forth below, including his expenditure of more  
5 than \$68 million between April and June of 2006 alone in order to  
6 acquire the defendant luxury Gulfstream jet and the defendant  
7 Sweetwater mansion in Malibu.

8 42. In March 2001, Minister Obiang Mangué purchased a home  
9 located on Antelo Road in Los Angeles, California for \$6.5  
10 million dollars. He later sold that property on November 14,  
11 2004 for \$7.7 million.

12 43. In March 2004, before selling the Antelo Road property,  
13 Minister Obiang Mangué purchased two luxury homes in South Africa  
14 for the equivalent of approximately US \$7.7 million.

15 44. Minister Obiang Mangué's extravagant expenditures have  
16 also included millions of dollars in exotic sports cars and  
17 luxury vehicles. These included, among others, 24 cars with a  
18 total declared value of \$9,680,000 that he stored at the Petersen  
19 Automotive Museum in Los Angeles until November 2010, when he  
20 shipped them, along with \$400,000 worth of motorcycles, to  
21 France. These cars included a \$2 million Maserati, a \$1.3  
22 million Bugatti sports car, seven Ferraris, four Rolls Royces,  
23 four Bentleys, four Mercedes, a Porsche, a Lamborghini, and an  
24 Aston Martin. All of these are in addition to the Bugatti,  
25 Bentley, Lamborghini, Ferrari, and Rolls Royces listed as  
26 defendants in this Complaint, which cost a total of \$5.2 million.

27 45. In June 2005, Minister Obiang Mangué purchased two  
28 high-performance racing boats in Fort Myers, Florida, for a total

1 of over \$2 million.

2 46. Between April and June 2006 -- the same period in which  
3 he spent \$30 million on the defendant Malibu mansion -- Minister  
4 Obiang Mangué purchased the defendant Gulfstream G-V private jet  
5 for over \$38 million. This aircraft is an ultra-long-range jet  
6 that can fly from Los Angeles to Tokyo nonstop, which, according  
7 to published reports, costs over \$3,000 per hour to operate. The  
8 plane routinely flies all over the world; for example; in  
9 December 2010 alone, it flew from Italy to Morocco; from there to  
10 Brazil; from there to Equatorial Guinea; and from there to  
11 Senegal.

12 47. Minister Obiang Mangué has also spent large sums on  
13 designer clothing and lavish vacations. In a single month in  
14 2004, for example, he spent over \$80,000 at Gucci and over  
15 \$50,000 at Dolce and Gabbana in a shopping spree in the United  
16 States. He also spent over \$100,000 at the Grand Wailea Resort  
17 in Hawaii in August-September 2005.

18 48. At auctions in June and October 2010, Minister Obiang  
19 Mangué spent a total of over \$1.8 million on various items  
20 belonging to the late singer and performer Michael Jackson,  
21 including \$80,000 for a pair of crystal socks, \$140,000 for a  
22 jacket and shirt, and \$245,000 for a ball signed by Michael  
23 Jackson and basketball star Michael Jordan.

24 49. In June 2008, a broker acting on behalf of Minister  
25 Obiang Mangué contacted a German yacht-building company that  
26 describes itself on its website as being "famous worldwide for  
27 high-end and quality yachts," and as engaging in the design and  
28 construction of "mega-yachts." Minister Obiang Mangué paid the

1 company approximately \$290,000 for the pre-design of a mega-  
2 yacht; the price of the yacht itself was to be in the  
3 neighborhood of \$380 million. When information about the  
4 proposed purchase became public in 2011, the Information and  
5 Press Bureau of the Government of Equatorial Guinea confirmed  
6 that Minister Obiang Mangue had ordered the design, while adding  
7 that he "then dismissed the idea of buying it." The spokesperson  
8 claimed that if the order had gone ahead Minister Obiang Mangue  
9 "would have bought it with income from his private business  
10 activities and he would not in any case have bought it with funds  
11 derived from sources of illegal financing or corruption."

12 50. These additional assets and expenditures, combined with  
13 the defendant Malibu mansion, the Gulfstream jet, the luxury  
14 vehicles, and the celebrity memorabilia, add up to over \$100  
15 million (not including the proposed \$380 million yacht).

16 Minister Obiang Mangue's Efforts to Conceal the Source and  
17 Ownership of His Funds

18 51. Following the issuance of the Riggs report in 2004,  
19 Minister Obiang Mangue had difficulty finding U.S. financial  
20 institutions willing to deal with him directly because of  
21 concerns that his funds were derived from corruption in  
22 Equatorial Guinea. In order to conceal the source and ownership  
23 of some of the funds he brought into the United States, Minister  
24 Obiang Mangue created shell companies in various names, including  
25 "Beautiful Vision, Inc." and "Unlimited Horizon, Inc.," and  
26 opened bank accounts in the United States in the names of those  
27 shell companies. He also wire transferred funds to bank accounts  
28 controlled by intermediaries, who then used the money to pay his

1 expenses, or transferred money from those accounts to accounts in  
2 the names of the shell companies and then used the shell company  
3 accounts to pay his expenses.

4 52. The steps Minister Obiang Mangué took after the  
5 negative publicity from the Riggs report to continue to make  
6 large purchases, and his concomitant efforts to conceal the  
7 source of his funds, are illustrated by his efforts to buy a  
8 Gulfstream jet, as set forth more fully below at paragraphs 65-  
9 74. In brief, Minister Obiang Mangué's initial effort to buy a  
10 Gulfstream jet directly from the manufacturer was terminated by  
11 Gulfstream after the Riggs report came out. The lawyers on both  
12 sides of the transaction were so concerned about possible civil  
13 or criminal liability as a result of their involvement in  
14 handling Minister Obiang Mangué's money that they requested  
15 assurances from the U.S. Department of Justice. Minister Obiang  
16 Mangué then tried to buy a used Gulfstream jet from a private  
17 party, but that transaction fell through when the escrow company  
18 insisted on knowing the source of the funds being used to buy the  
19 jet. Finally, Minister Obiang Mangué was able to complete the  
20 transaction by using a different escrow company that did not  
21 require such information and an escrow account at a foreign bank.

22 **Purchase of the Defendants In Rem**

23 53. As set forth below, Minister Obiang Mangué followed a  
24 pattern of enormous expenditures with no financing and the use of  
25 intermediaries and shell companies to acquire the defendants in  
26 rem.



Purchase of the Defendant White Crystal-Covered "Bad Tour" Glove  
and Other Michael Jackson Memorabilia

54. In August 2010, an intermediary registered Minister Obiang Mangué to bid in a live auction of celebrity memorabilia (called the "Legends" auction) taking place on October 9, 2010, in Macau, China (October 8, 2010, in California). The intermediary advised the auction house by email to "Please make sure that [Minister Obiang Mangué's] name does not appear anywhere, he should be invisible," and to "please make sure that where a name needs to be, my name is there. This is very important."

55. At the "Legends" auction, the intermediary bid on various auction items by telephone from Los Angeles, for Minister Obiang Mangué, and was the winning bidder on numerous items of Michael Jackson memorabilia. The auction house prepared two invoices in the name of the intermediary, using the address of the Sweetwater property. The total of the two invoices was \$1,398,062.50.

56. When one of Minister Obiang Mangué's assistants received the invoices, she instructed the auction house to revise the invoices to indicate that the purchases were being billed to "Amadeo Oluy, Malabo, Guinea Equatorial." These items were shipped to France and Equatorial Guinea.

57. On December 10, 2010, another auction of celebrity memorabilia was held by the same auction house, this time in Beverly Hills, California. An intermediary came to the auction on Minister Obiang Mangué's behalf and successfully bid on the defendant white crystal-covered "Bad Tour" glove and other

1 defendant items listed in Attachment A-1, attached hereto. The  
2 total cost of these items was \$872,125.00.

3 58. In accordance with the instructions it had previously  
4 received, the auction house prepared invoices that did not list  
5 the buyer as Minister Obiang Mangué, but instead used the name of  
6 a straw purchaser, with the address Sweetwater, Malabo, Guinea  
7 Equatorial.

8 59. On January 31, 2011, Minister Obiang Mangué caused  
9 \$872,112.00 to be wire transferred from an account in the name of  
10 Eloba Construcción, S.A., in Equatorial Guinea to an account at  
11 American Business Bank in Los Angeles in the name of the auction  
12 house, Julien Entertainment, to pay for the items purchased in  
13 the December 10, 2010 auction. These items were subsequently  
14 packed for shipment and delivered to the defendant Sweetwater  
15 property.

16 60. On March 26, 2011, the auction house held another  
17 auction, called "Rock Legends." Again, an intermediary bid on  
18 items on Minister Obiang Mangué's behalf. Through the  
19 intermediary, Minister Obiang Mangué purchased the items listed  
20 in Attachment A-2, attached, for a total purchase price of  
21 \$115,000.

22 61. On March 29, 2011, an employee of the auction house  
23 sent her employer an email regarding the invoices for the items  
24 purchased on behalf of Minister Obiang Mangué, asking,

25 I assume I need to rewrite the invoices in the same  
26 fashion as I've done in prior sales? (putting all lots  
27 on one page, adding catalog page numbers and changing  
the Buyer's name)

28 62. The invoices were prepared listing the intermediary,

1 rather than Minister Obiang Mangué, as the buyer.

2 63. On April 15, 2011, Minister Obiang Mangué caused a net  
3 total of \$119,974.00 to be wire transferred from his account in  
4 the name of "Eloba Construcción S.A." in Equatorial Guinea to the  
5 bank account of the auction house at American Business Bank in  
6 Los Angeles, California, to pay for the items purchased at the  
7 March 26, 2011 auction.

8 64. The items listed in Attachment A-2 are believed to be  
9 currently located at a shipping company called Rockin Boxes,  
10 28337 Constellation Road, Santa Clarita, California.

11 **Purchase of the Defendant Gulfstream Jet**

12 65. Initially, Minister Obiang Mangué sought to purchase a  
13 \$40 million aircraft directly from the manufacturer, Gulfstream  
14 Aerospace ("Gulfstream"), in the United States. Minister Obiang  
15 Mangué began negotiating the purchase in late 2003 or early 2004  
16 and sent approximately \$20 million to an escrow account  
17 associated with Gulfstream. However, after the publication of  
18 the Riggs report in July 2004, Gulfstream decided to cancel the  
19 transaction and wanted to return the \$20 million to a law firm  
20 representing Minister Obiang Mangué.

21 66. Both Gulfstream's lawyers and Minister Obiang Mangué's  
22 lawyers were concerned about returning the \$20 million, fearing  
23 that movement of the funds could trigger a seizure or forfeiture  
24 by the U.S. government, or that the parties involved in the  
25 transaction could be prosecuted under the federal money  
26 laundering statutes. In approximately January 2005, therefore,  
27 the lawyers requested a letter from the U.S. Department of  
28 Justice assuring them that no such actions would be taken.

1        67. At that time, the Justice Department had not targeted  
2 Minister Obiang Mangué or his finances for investigation. In  
3 response to the lawyers' request, the Justice Department sent a  
4 letter to Gulfstream's lawyers on March 23, 2005, and a similar  
5 letter to the law firm representing Minister Obiang Mangué on  
6 April 18, 2005, saying that "at the present time" the Department  
7 of Justice had "no basis for either restraining or seizing" the  
8 funds and that "at this time" the Department had "no basis for  
9 believing" that the funds "would violate the U.S. money  
10 laundering laws."

11        68. On July 28, 2005, Gulfstream wire transferred the \$20  
12 million, plus interest, to the bank account of the law firm  
13 representing Minister Obiang Mangué.

14        69. Having been rejected by Gulfstream Aerospace, Minister  
15 Obiang Mangué sought to purchase a used Gulfstream V jet from a  
16 private party in 2006 for \$38.5 million. For purposes of the  
17 transaction, Minister Obiang Mangué used a British Virgin Islands  
18 shell company, Ebony Shine International Ltd., as the nominal  
19 buyer, and a U.S. company, Insured Aircraft Title Services  
20 ("IATS") of Oklahoma City, as its escrow agent.

21        70. The seller was Blue Sapphire Services, Ltd. (also a  
22 British Virgin Islands shell corporation), which used McAfee &  
23 Taft, a U.S. company headquartered in Oklahoma City, as its  
24 escrow agent. At the time of the attempted transaction, the  
25 aircraft was registered with the Federal Aviation Administration  
26 in Oklahoma City, and Wells Fargo Bank Northwest served as the  
27 aircraft's U.S. registered owner.

28        71. On March 23, 2006, at Minister Obiang Mangué's

1 instruction, IATS wire transferred approximately \$4.7 million  
2 from an account at UBS London to a McAfee & Taft escrow account  
3 at Bank of America in Oklahoma City. From April 4-7, 2006,  
4 Minister Obiang Mangué wired a total of \$10,300,000 from his  
5 personal account at Société Générale de Banque en Guinée  
6 Équatoriale, Malabo, to the McAfee & Taft escrow account at Bank  
7 of America in Oklahoma City.

8 72. Despite having received a total of \$15 million toward  
9 the purchase price, McAfee & Taft was not willing to proceed with  
10 the transaction because the buyer, Minister Obiang Mangué, had  
11 not complied with its requirements, including a requirement that  
12 the buyer identify the source of the funds. McAfee & Taft  
13 therefore cancelled the transaction.

14 73. On April 12, 2006, McAfee & Taft returned a total of  
15 \$10,299,950.00 to Minister Obiang Mangué's account in Equatorial  
16 Guinea, and \$4,723,262.22 to IATS's account at UBS London.

17 74. Minister Obiang Mangué was ultimately able to complete  
18 the aircraft purchase by using IATS of Oklahoma City as the  
19 escrow agent instead of McAfee & Taft, and by depositing the  
20 funds into IATS's account at UBS London. Unlike McAfee & Taft,  
21 IATS did not require information as to the source of the \$38.5  
22 million used to buy the aircraft. The funds were provided by  
23 Minister Obiang Mangué from his personal account in Equatorial  
24 Guinea. The payments were executed via transactions into and out  
25 of correspondent accounts in the United States before arriving at  
26 the IATS account at UBS London.

27 **Purchase of the Defendant Real Property**

28 75. The defendant real property is located in an exclusive

1 gated community in Malibu, California and at the time of purchase  
2 in 2006 included approximately 12 acres of land overlooking the  
3 Pacific Ocean, a 15,000-square foot main house, a 2,500-square  
4 foot guest house, two gate houses, a pool overlooking the ocean,  
5 a putting green, and a tennis court.

6 76. In approximately February 2006, Minister Obiang Mangué  
7 reached an agreement to purchase the defendant real property for  
8 approximately \$30 million, notwithstanding his annual salary of  
9 less than \$100,000. Minister Obiang Mangué's purchase of the  
10 defendant mansion was one of the ten most expensive home  
11 purchases in the United States in 2006.

12 77. However, Minister Obiang Mangué did not purchase the  
13 defendant real property in his own name. On or about February 8,  
14 2006, Minister Obiang Mangué caused the formation of a  
15 corporation called Sweetwater Malibu, LLC, for the purpose of  
16 taking title to the defendant real property. Minister Obiang  
17 Mangué was the sole owner of the corporation at all times, and  
18 provided Sweetwater Malibu, LLC with all necessary funds to take  
19 title to the defendant real property.

20 78. A grant deed was recorded indicating that the seller  
21 sold the defendant real property to "Sweetwater Malibu, LLC" on  
22 February 27, 2006. However, escrow did not close, and the deed  
23 was not recorded, until April 27, 2006.

24 79. Obiang Mangué paid a total of \$30,442,000 into escrow  
25 account #LGL-226-1234 at First American Title Company, 520 North  
26 Central Avenue, Glendale, California 91203, held at First  
27 American Trust FSB in Santa Ana, California, for the purchase of  
28 the defendant real property. These payments were made as follows

1 on or about the following dates:

2 80. On February 2, 2006, West Coast Escrow, on behalf of  
3 Minister Obiang Mangué, wire transferred \$900,000 from one of its  
4 escrow accounts to First American Title Company's escrow account.  
5 These funds had come from Minister Obiang Mangué's unsuccessful  
6 attempt to buy a private jet directly from Gulfstream Aerospace  
7 Corporation in 2005. When it cancelled the sale, Gulfstream  
8 released approximately \$20 million plus interest that it had  
9 received as partial payment for the plane to Minister Obiang  
10 Mangué through a U.S. law firm. Per Minister Obiang Mangué's  
11 instructions, the law firm transferred \$900,000 of these funds to  
12 West Coast Escrow on December 22, 2005, in connection with an  
13 earlier attempt by Minister Obiang Mangué to purchase the  
14 defendant real property. West Coast Escrow, in turn, executed  
15 this transfer into the First American Title Company escrow  
16 account in California in February 2006.

17 81. From April 5, 2006, through April 26, 2006, Minister  
18 Obiang Mangué sent five wire transfers, each in the amount of  
19 \$5,908,400, from Equatorial Guinea to the First American Trust  
20 escrow account. The funds originated at Société Générale de  
21 Banque en Guinée Équatoriale, where Minister Obiang Mangué held a  
22 personal account. The total amount of these five wire transfers  
23 was \$29,542,000. Added to the \$900,000 initial payment into  
24 escrow, the total amount paid into escrow was \$30,442,000.

25 82. The total purchase price for the defendant real  
26 property was paid from funds provided by Minister Obiang Mangué  
27 and no mortgage was used.  
28

1 **The Defendant Vehicles**

2 83. As described below, Minister Obiang Mangué purchased  
3 six of the defendant vehicles from O'Gara Coach Company in  
4 Beverly Hills, and the defendant Ferrari 599 GTO from Ferrari of  
5 Beverly Hills. The defendant vehicles are titled in the name of  
6 Teodoro Nguema Obiang.

7 **2007 Bentley Azure**

8 84. On June 15, 2007, Minister Obiang Mangué signed a  
9 contract to purchase the defendant 2007 Bentley Azure for a total  
10 purchase price of \$424,772.57. Minister Obiang Mangué paid for  
11 the car as follows: On or about May 16, 2007, he wire transferred  
12 \$424,772.57 from an account in the name of "Somagui" at CCEI  
13 Bank, Equatorial Guinea, to the account of O'Gara Coach Co.,  
14 Beverly Hills, California at Bank of America in Los Angeles,  
15 California. According to shipping records, the defendant 2007  
16 Bentley Azure was exported to Paris, France on November 14, 2010.

17 **2008 Bugatti Veyron**

18 85. On April 10, 2008, Minister Obiang Mangué purchased the  
19 defendant 2008 Bugatti Veyron for a total purchase price of  
20 \$2,038,391.89. Minister Obiang Mangué paid for the car as  
21 follows: On or about April 10, 2008, he paid \$1,771,680.00 in  
22 cash, leaving a balance due of \$266,711.89. On April 14, 2008,  
23 he wire transferred \$266,640.22 from an account in his name at  
24 CCEI Bank, Equatorial Guinea, to the account of O'Gara Coach Co.,  
25 Beverly Hills, California at Bank of America in Los Angeles,  
26 California. (Again, the seller apparently accepted this wire  
27 transfer as payment in full, although it was \$71.67 short.)  
28 According to shipping records, the defendant 2008 Bugatti Veyron



1 was exported to Paris, France on November 14, 2010.

2 **2008 Lamborghini Murcielago**

3 86. On July 30, 2005, Minister Obiang Mangué purchased a  
4 2005 Lamborghini Murcielago from O'Gara Coach Company in Beverly  
5 Hills, California, for a total purchase price of \$380,173.96. He  
6 paid for it in full on that date, with \$50,000 in cash and a  
7 check for \$330,173.96 drawn on a bank account in the name of  
8 Beautiful Vision, Inc., at Bank of America in Beverly Hills. The  
9 funds drawn from the Beautiful Vision account are traceable as  
10 follows:

11 87. On March 15, 2004, Minister Obiang Mangué sent a wire  
12 transfer in the amount of \$999,950 from Equatorial Guinea to a  
13 client-trust account at City National Bank. Minister Obiang  
14 Mangué later described the source of these funds as "either  
15 Somagui Forestal or Sofona," his forestry companies.

16 88. On June 24, 2005, City National Bank gave two checks  
17 totaling \$699,691 to Minister Obiang Mangué's attorney after  
18 closing the client-trust account. Minister Obiang Mangué's  
19 attorney deposited the two checks into his client-trust account  
20 at Bank of America.

21 89. On July 29, 2005, \$669,691 was transferred from the  
22 above-referenced client-trust account at Bank of America to  
23 Obiang Mangué's account at Bank of America in Beverly Hills,  
24 California, in the name of the shell corporation Beautiful  
25 Vision.

26 90. On July 30, 2005, Minister Obiang Mangué wrote a check  
27 for \$330,173.96 on the Beautiful Vision account at Bank of  
28 America in Beverly Hills, California, made payable to O'Gara

1 Coach Company, for the 2005 Lamborghini Roadster. This check was  
2 deposited into O'Gara Coach Company's account at Bank of America  
3 in Los Angeles, California.

4 91. On August 31, 2007, Minister Obiang Mangué traded in  
5 the 2005 Lamborghini Murcielago for the defendant 2008  
6 Lamborghini Murcielago. The total price of the new car reflected  
7 in the sales contract was \$501,073.29, of which \$270,000.00 was  
8 paid from the trade-in of his 2005 Lamborghini. Minister Obiang  
9 Mangué paid the remaining balance using a wire transfer of  
10 \$230,976.23 from an account in the name of "Somagui," Bata,  
11 Guinée Equatoriale, to the account of O'Gara Coach Company,  
12 Beverly Hills at Bank of America in Los Angeles, California on  
13 October 12, 2007. (Although this was \$97.06 less than the  
14 contract sales price, the seller apparently accepted it as  
15 payment in full.) According to records of U.S. Customs and  
16 Border Protection (CBP), the defendant Lamborghini was exported  
17 to Paris, France on August 19, 2010.

18 **2008 Rolls Royce Drophead Coupe**

19 92. On March 26, 2008, Minister Obiang Mangué purchased the  
20 defendant 2008 Rolls Royce Drophead Coupe for a total purchase  
21 price of \$609,973.29. Minister Obiang Mangué paid for the car as  
22 follows: On March 18, 2008, he wire transferred \$609,898.33 from  
23 an account in the name of "Socage" at CCEI Bank, Equatorial  
24 Guinea, to the account of O'Gara Coach Co., Beverly Hills at Bank  
25 of America in Los Angeles, California. (Again, the seller  
26 apparently accepted this wire transfer as payment in full,  
27 although it was \$74.96 short.) According to CBP export records,  
28 the defendant 2008 Rolls Royce Drophead Coupe was exported to

1 Paris, France on May 13, 2010.

2 **2009 Rolls Royce Drophead Coupe**

3 93. On September 22, 2008, Minister Obiang Mangué agreed to  
4 purchase the defendant 2009 Rolls Royce Drophead Coupe for a  
5 total price of \$609,984.29. He paid for it by wire transferring  
6 \$609,912.87 on October 6, 2008 from an account in his name at  
7 CCEI Bank in Equatorial Guinea to the account of O'Gara Coach  
8 Co., Beverly Hills, at Bank of America in Los Angeles,  
9 California. (Again, the seller apparently accepted this wire  
10 transfer as payment in full, despite a \$71.42 discrepancy.)  
11 According to CBP export records, the 2009 Rolls Royce Drophead  
12 Coupe was exported to Paris, France on August 19, 2010.

13 **2009 Rolls Royce Phantom Coupe**

14 94. On January 26, 2009, Minister Obiang Mangué purchased  
15 the defendant 2009 Rolls Royce Phantom Coupe for a total purchase  
16 price of \$499,910.45. Minister Obiang Mangué paid for the car as  
17 follows: On or about January 26, 2009, he wire transferred  
18 \$499,910.45 from an account in his name at CCEI Bank, Equatorial  
19 Guinea, to the account of O'Gara Coach Co., Beverly Hills at Bank  
20 of America in Los Angeles, California. According to CBP export  
21 records, the defendant 2009 Rolls Royce Phantom Coupe was  
22 exported to Paris, France on August 19, 2010.

23 **2011 Ferrari 599 GTO**

24 95. On or about November 11, 2010, Minister Obiang Mangué  
25 took delivery of the defendant 2011 Ferrari 599 GTO from Ferrari  
26 of Beverly Hills. Minister Obiang Mangué caused his forestry  
27 company, Somagui, to make initial down payments on his behalf by  
28 executing wire transfers of approximately \$25,131, \$39,912, and

1 \$14,929.65 to the account of Ferrari of Beverly Hills at Pacific  
2 Western Bank in California in November and December of 2009.  
3 After a portion of these funds were refunded, Minister Obiang  
4 Mangue paid the balance of \$493,010.99 via wire transfer to  
5 Pacific Western Bank in December 2010. The total recorded  
6 purchase price for the vehicle was \$532,984.12. The defendant  
7 Ferrari is believed to be located at the Sweetwater property.

8 Law of Equatorial Guinea

9 96. The criminal law of Equatorial Guinea continues to be  
10 the law in effect at the time of independence, *i.e.*, the criminal  
11 code that was in force in Spain in 1968. That code contains the  
12 following provisions, among others, which effectively prohibit  
13 extortion, bribery, misappropriation, theft, and embezzlement of  
14 public funds by or for the benefit of a public official:

15 a) A public official may not take advantage of his position  
16 to involve himself directly or indirectly with private  
17 associations or companies with the intent to profit (article  
18 198);

19 b) A person without title or legitimate authority may not  
20 exercise the actions of an Authority or public official (article  
21 320);

22 c) A public official may not solicit or receive, directly or  
23 indirectly, a gift, offer or promise in exchange for a criminal  
24 or unjust act or omission related to his position (article 385,  
25 *et seq.*);

26 d) A public official may not accept gifts presented to him  
27 in the normal course of his duties for performing an act that  
28 should not be compensated (article 390);

1 e) A person may not corrupt or attempt to corrupt a public  
2 official with gifts, offers, or promises (article 391);

3 f) A public official may not steal or consent to the theft  
4 by another of public funds or property that may be under his  
5 control by virtue of his duties (article 394);

6 g) A public official may not use public funds or property  
7 placed under his control for personal use (article 396);

8 h) A public official may not directly or indirectly hold an  
9 interest in any type of contract or operation in which he must be  
10 involved by reason of his position (article 401);

11 i) A government or economic leader may not, during the  
12 discharge of his duties, take part directly or indirectly in  
13 trading or for-profit transactions, within the limits of his  
14 jurisdiction or command, involving objects that are not the  
15 product of his own property (article 404);

16 j) A person with intent to enrich may not take property  
17 without the consent of the owner (article 514).

18 97. Under the Spanish criminal code in effect in Equatorial  
19 Guinea, accomplices or persons who cover up or impede the  
20 discovery of a crime may be held criminally responsible for the  
21 offense (article 12, *et seq.*).

22 **Conclusion**

23 98. As set forth above, despite a modest government salary,  
24 Minister Obiang Mangué has acquired vast wealth of tens of  
25 millions of dollars during a period in which his family and their  
26 associates have been the near exclusive beneficiaries of the sale  
27 and exploitation of Equatorial Guinea's natural resources, which  
28 by law, are public property. He exercises cabinet-level

1 authority over a ministry that regulates a sector in which he  
2 holds business interests, in violation of the law of Equatorial  
3 Guinea. Through his influence as the president's son, he has  
4 directly or indirectly sought to obtain property through the  
5 exploitation of the nation's oil and gas resources, over which  
6 his family has exercised plenary control for their own benefit.  
7 Minister Obiang Mangue also has taken significant steps to  
8 conceal the source and ownership of his funds and assets, the  
9 value of which is of a magnitude wholly incompatible with his  
10 government salary. In light of these and the other facts set  
11 forth above, it is more likely than not that the defendants *in*  
12 *rem* constitute assets derived from extortion or bribery,  
13 misappropriation, theft, or embezzlement of public funds by or  
14 for the benefit of a public official.

15 99. On information and belief, the approximately \$75  
16 million used by Minister Obiang Mangue to purchase the defendant  
17 assets was derived from funds obtained through extortion or  
18 bribery, misappropriation, theft, or embezzlement of public funds  
19 by or for the benefit of a public official, in violation of the  
20 laws of Equatorial Guinea.

21 **FIRST CLAIM FOR FORFEITURE**

22 (18 U.S.C. § 981(a)(1)(C))

23 100. Paragraphs 1-99 above are incorporated by reference as  
24 if fully set forth herein.

25 101. Pursuant to 18 U.S.C. § 981(a)(1)(C), "[a]ny property,  
26 real or personal, which constitutes or is derived from proceeds  
27 traceable to . . . any offense constituting 'specified unlawful  
28 activity'" is subject to forfeiture to the United States.

1        102. "Specified unlawful activity" is defined in 18 U.S.C.  
2 § 1956(c)(7)(B)(ii) and (iv) to include, among other things, an  
3 offense against a foreign nation involving "extortion" or  
4 "bribery of a public official, or the misappropriation, theft, or  
5 embezzlement of public funds by or for the benefit of a public  
6 official."

7        103. As set forth above, the funds used to purchase the  
8 defendant real property, jet, vehicles, and memorabilia were  
9 derived from extortion, or bribery of a public official, or the  
10 misappropriation, theft, or embezzlement of public funds by or  
11 for the benefit of a public official, in violation of the laws of  
12 Equatorial Guinea.

13        104. Therefore, the defendant assets are subject to  
14 forfeiture to the United States pursuant to 18 U.S.C.  
15 § 981(a)(1)(C), on the grounds that they constitute or are  
16 derived from proceeds traceable to a specified unlawful activity.

17                    **SECOND CLAIM FOR FORFEITURE**

18                    (18 U.S.C. § 981(a)(1)(A))

19        105. Paragraphs 1-99 above are incorporated by reference as  
20 if fully set forth herein.

21        106. Pursuant to 18 U.S.C. § 981(a)(1)(A), "[a]ny property,  
22 real or personal, involved in a transaction or attempted  
23 transaction in violation of section . . . 1957 . . . of [title  
24 18, United States Code], or any property traceable to such  
25 property," is subject to forfeiture to the United States.

26        107. 18 U.S.C. § 1957 imposes a criminal penalty on any  
27 person who:

28                    knowingly engages or attempts to engage in a monetary  
                     transaction in criminally derived property of a value

1 greater than \$10,000 and is derived from specified  
2 unlawful activity.

3 108. For purposes of Section 1957, the term "specified  
4 unlawful activity" has the same meaning as set forth in paragraph  
5 102 above.

6 109. As set forth above, the defendants *in rem* were the  
7 subject of monetary transactions or attempted transactions  
8 involving criminally-derived property of a value greater than  
9 \$10,000 and derived from specified unlawful activity, that is,  
10 extortion or bribery of a public official or the  
11 misappropriation, theft, or embezzlement of public funds by or  
12 for the benefit of a public official, in violation of the laws of  
13 Equatorial Guinea.

14 110. Therefore, the defendants *in rem* are subject to  
15 forfeiture to the United States pursuant to 18 U.S.C.  
16 § 981(a)(1)(A), on the grounds that they were involved in  
17 transactions or attempted transactions in violation of 18 U.S.C.  
18 § 1957, or are traceable to such property.

19 **THIRD CLAIM FOR FORFEITURE**

20 (18 U.S.C. § 981(a)(1)(A))

21 111. Paragraphs 1-99 above are incorporated by reference as  
22 if fully set forth herein.

23 112. Pursuant to 18 U.S.C. § 981(a)(1)(A), "[a]ny property,  
24 real or personal, involved in a transaction or attempted  
25 transaction in violation of section 1956 . . . of [title 18,  
26 United States Code], or any property traceable to such property,"  
27 is subject to forfeiture to the United States.

28 113. 18 U.S.C. § 1956(a)(1) imposes a criminal penalty on



1 any person who:

2 knowing that the property involved in a financial  
3 transaction represents the proceeds of some form of unlawful  
4 activity, conducts or attempts to conduct such a financial  
unlawful activity -

5 (B) knowing that the transaction is designed in  
whole or in part -

6 (i) to conceal or disguise the  
7 nature, the location, the source,  
8 the ownership, or the control of  
the proceeds of specified unlawful  
activity[.]

9 114. For purposes of Section 1956, the term "specified  
10 unlawful activity" has the same meaning as set forth in paragraph  
11 102 above.

12 115. As set forth above, the defendant real property,  
13 Gulfstream jet, and memorabilia were the subject of financial  
14 transactions and attempted financial transactions and, for the  
15 reasons set forth above, the funds involved in those transactions  
16 were derived from specified unlawful activity, that is, extortion  
17 or bribery of a public official or the misappropriation, theft,  
18 or embezzlement of public funds by or for the benefit of a public  
19 official, in violation of the laws of Equatorial Guinea. Also,  
20 as set forth above, the transactions were designed in whole or in  
21 part to conceal or disguise the source, ownership, or control of  
22 the proceeds of specified unlawful activity, in that, among other  
23 things, the nominal purchaser of the defendant Gulfstream jet was  
24 Ebony Shine International Ltd., the nominal purchaser of the  
25 defendant real property was Sweetwater Malibu, LLC, and the  
26 invoices for the defendant memorabilia were put in the name of  
27 Minister Obiang Mangué's assistant or a straw purchaser, rather  
28 than the name of the true owner, Teodoro Nguema Obiang Mangué.

1        116. Therefore, the defendant real property, the defendant  
2 Gulfstream jet, and the defendant memorabilia are subject to  
3 forfeiture to the United States pursuant to 18 U.S.C.  
4 § 981(a)(1)(A), on the grounds that they were involved in  
5 transactions or attempted transactions in violation of 18 U.S.C.  
6 § 1956(a)(1)(B)(i), or are traceable to such property.


CLAIM FOR RELIEF

WHEREFORE plaintiff, the United States of America, requests that judgment be entered in its favor and against the defendants *in rem*, and that process issue to enforce the forfeiture of the defendants *in rem*, and that all persons having an interest in the defendants *in rem* be cited to appear and show cause why the forfeiture should not be decreed, and that this Court decree forfeiture of the defendants *in rem* to the United States of America for disposition according to law, and that this Court grant the Government such further relief as this Court may deem just and proper, together with the costs and disbursements in this action.

DATED: 4-26, 2011

JENNIFER SHASKY CALVERY, CHIEF  
ASSET FORFEITURE AND MONEY  
LAUNDERING SECTION

LINDA M. SAMUEL  
Deputy Chief, AFMLS  
DANIEL H. CLAMAN  
Assistant Chief, AFMLS

  
JANET C. HUDSON  
Senior Trial Attorney, AFMLS  
Criminal Division  
United States Department of Justice

ANDRÉ BIROTTE, JR.  
United States Attorney  
STEVEN WELK  
Assistant United States Attorney

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

**VERIFICATION**

I, Robert Manzanares, hereby verify and declare under penalty of perjury that I am a Special Agent with Homeland Security Investigations, that I have read the foregoing Verified Complaint for Forfeiture *In Rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to the best of my knowledge and belief.

The sources of my knowledge and information and the grounds of my belief are official files and records of the United States, publicly available files and historical information, files and records compiled by the Senate Permanent Subcommittee on Investigations, information supplied to me by other law enforcement officers, experts, and other witnesses, as well as my investigation in this case, together with others, as a Special Agent of Homeland Security Investigations.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 26 day of April, 2011, at 4:00 pm.



ROBERT MANZANARES  
Special Agent  
Homeland Security Investigations

ATTACHMENT A-1:

## ICONS AND IDOLS

Lot No.	Description	Price
586	MICHAEL JACKSON BAD TOUR GLOVE	275,000.00
573	"WE ARE THE WORLD" MTV VIDEO MUSIC AWARD	60,000.00
585	MICHAEL JACKSON STAGE WORN FEDORA	60,000.00
621	MICHAEL JACKSON STAGE WORN FEDORA	60,000.00
553	MICHAEL JACKSON SIGNED FEDORA	42,500.00
549	MICHAEL JACKSON SIGNED THRILLER JACKET	40,000.00
650B	M.J. STAGE WORN SIGNED GOLD FENCING SHIRT	30,000.00
606	MICHAEL JACKSON WORN FEDORA	25,000.00
556	MICHAEL JACKSON "GOLD" RECORD AWARD	10,000.00
576	"WE ARE THE WORLD" SIGNED DOCUMENT ARCHIVE	10,000.00
575	"WE ARE THE WORLD" SIGNED ALBUM	8,000.00
650	M.J. NEVERLAND RANCH GOLD & COUNTRY BY	7,000.00
580	MICHAEL JACKSON SIGNED SHEET MUSIC	6,500.00
617	MICHAEL JACKSON SIGNED PHOTOGRAPH	5,250.00
624	MICHAEL JACKSON KATHERINE BAUMANN BAG	5,000.00
557	MICHAEL JACKSON "THRILLER" RECORD AWARD	4,500.00
589	MICHAEL JACKSON SIGNED BAD ERA POSTER	4,000.00
635a	M. JACKSON AND TROY AIKMAN SIGNED FOOTBALL	4,000.00
579	MICHAEL JACKSON "PLATINUM" RECORD AWARD	3,500.00
588	MICHAEL JACKSON SIGNED PHOTO	3,250.00
558	M. JACKSON SIGNED "THRILLER" 12-INCH SINGLE	3,000.00
584	M.JACKSON AND PAUL MCCARTNEY SIGNED BAG	3,000.00
540	JACKSON 5 "GOLD" SINGLE AWARD	2,500.00
614	MICHAEL JACKSON SIGNED BANNER	2,400.00
616	MICHAEL JACKSON SIGNED POSTER	2,400.00
550	M. JACKSON SIGNED PHOTOGRAPH FROM DISNEYLAND	2,250.00
647	M. JACKSON NEVERLAND RANCH LIFE SIZE FIGURE O	2,250.00
645	M. JACKSON NEVERLAND RANCH LIFE SIZED SEATED	2,000.00
646	M. JACKSON NEVERLAND RANCH LIFE SIZE INDIAN F	2,000.00
648	M. JACKSON NEVERLAND RANCH LIFE SIZE FIGURE Y	2,000.00
539	JACKSON 5 "GOLD" RECORD AWARD	1,500.00
650C	M. JACKSON SIGNED "LIVE AND DANGEROUS" BOOK	1,500.00
555	M. JACKSON "THRILLER" COMMEMORATIVE STATUE	1,400.00
623	M. JACKSON KATHARINE BAUMANN FOOTBALL BAG	1,400.00
610	M. JACKSON SIGNED HISTORY MAGAZINE CUTOUT	1,300.00
643	M. JACKSON NEVERLAND RANCH LIFE SIZE FIGURE O	1,300.00
642	M. JACKSON NEVERLAND RANCH LIFE SIZE FIGURE O	700.00
644	M. JACKSON NEVERLAND RANCH LIFE SIZE WESTERN	700.00
603	MICHAEL JACKSON STATUETTE	<u>600.00</u>
	SUBTOTAL	697,700.00
	PLUS 25% BUYER'S PREMIUM	<u>174,425.00</u>
	TOTAL	872,125.00

ATTACHMENT A-2:

## ROCK N ROLL

Lot No.	Description	Price
180	MICHAEL JACKSON'S PERSONAL MTV MOONMAN	50,000.00
	PLUS 20% BUYER'S PREMIUM	<u>10,000.00</u>
	TOTAL	<b>60,000.00</b>
152	M. JACKSON "GOLD" RECORD AWARD FOR "BEAT IT"	10,000.00
139	JACKSON 5 "GOLD" RECORD AWARD	6,500.00
164	M. JACKSON ARTIST OF THE DECADE LIMITED EDITION	6,500.00
148	MICHAEL JACKSON SIGNED THRILLER DISPLAY	6,000.00
153	MICHAEL JACKSON THRILLER RECORD AWARD	4,500.00
154	MICHAEL JACKSON THRILLER DISPLAY	4,500.00
147	M. JACKSON THRILLER COMMEMORATIVE AWARD	3,000.00
186	M. JACKSON CARLITTA COLLECTION FIGURINES	1,600.00
185	M. JACKSON PORCELAIN HISTORY FIGURINE	600.00
183	M. JACKSON CARLITTA COLLECTION FIGURINE	400.00
184	MICHAEL JACKSON WHITE HISTORY FIGURINE	<u>400.00</u>
	SUBTOTAL	44,000.00
	PLUS 25% BUYER'S PREMIUM	<u>11,000.00</u>
	TOTAL	<b>55,000.00</b>
GRAND TOTAL		<b>115,000.00</b>

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## LEGAL DESCRIPTION

Real property in the City of Malibu, County of Los Angeles, State of California, described as follows:

## PARCEL 1:

A PARCEL OF LAND BEING A PORTION OF RANCHO TOPANGA MALIBU SEQUIT, AS CONFIRMED TO MATTHEW KELLER BY PATENT RECORDED IN BOOK 1 PAGE 407, ET SEQ., OF PATENTS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE NORTHERLY LINE OF THE STRIP OF LAND DESCRIBED IN A DEED FROM MARBLEHEAD LAND COMPANY TO THE STATE OF CALIFORNIA, RECORDED IN BOOK 16845 PAGE 253, OFFICIAL RECORDS, SAID POINT OF BEGINNING BEING NORTH 46° 08' 15" WEST 60 FEET FROM ENGINEER'S CENTER LINE STATION 936 PLUS 62.94 AT THE WESTERLY EXTREMITY OF THAT CERTAIN CENTER LINE COURSE DESCRIBED AS NORTH 43° 51' 45" EAST 362.63 FEET IN THE DEED OF THE 80 FOOT STRIP OF LAND FROM T. R. CADWALADER, ET AL., TO THE STATE OF CALIFORNIA, RECORDED IN BOOK 15228 PAGE 342, OFFICIAL RECORDS; THENCE NORTH 43° 51' 45" EAST 189.63 FEET ALONG THE NORTHERLY LINE OF SAID FIRST MENTIONED STRIP; THENCE NORTH 46° 08' 15" WEST 192.92 FEET; THENCE NORTH 31° 32' 55" EAST 214.93 FEET; THENCE NORTH 42° 01' 59" EAST 186.06 FEET; THENCE NORTH 54° 23' 15" EAST 77.65 FEET, MORE OR LESS, TO THE NORTHWESTERLY CORNER OF THE PARCEL OF LAND DESCRIBED IN A DEED FROM MARBLEHEAD LAND COMPANY TO CHESTER A. VOUGHT AND WIFE RECORDED IN BOOK 20254 PAGE 69, OFFICIAL RECORDS; THENCE NORTH 53° 17' 55" EAST 152.26 FEET ALONG THE NORTHERLY LINE OF SAID PARCEL TO THE NORTHEASTERLY CORNER THEREOF; THENCE NORTH 32° 19' 55" WEST 119.27 FEET; THENCE NORTH 46° 58' 55" EAST 28.96 FEET; THENCE 50° 59' 55" WEST 161.73 FEET; THENCE NORTH 62° 09' 00" WEST 123.16 FEET; THENCE SOUTH 60° 48' 00" WEST 21.76 FEET; THENCE SOUTH 29° 12' EAST 75 FEET; THENCE SOUTH 60° 48' WEST 183.01 FEET; THENCE SOUTH 45° 17' 30" WEST 139.76 FEET; THENCE SOUTH 62° 12' 40" WEST 258.81 FEET; THENCE NORTH 44° 07' 06" WEST 158.98 FEET TO THE CENTER LINE DESCRIBED IN THE DEED TO SANGER W. CRUMPACKER ET AL, RECORDED JANUARY 22, 1944 AS INSTRUMENT NO. 973 IN BOOK 20517 PAGE 382, OFFICIAL RECORDS; THENCE ALONG SAID CENTER LINE AS TO THE BEGINNING OF TANGENT CURVE CONCAVE SOUTHEASTERLY WITH A RADIUS OF 183.32 FEET SOUTHWESTERLY ALONG THE ARC OF SAID CURVE 171.24 FEET, TANGENT SOUTH 01° 48' 25" WEST 256.65 FEET TO THE BEGINNING OF TANGENT CURVE CONCAVE EASTERLY WITH A RADIUS OF 253.04 FEET SOUTHERLY ALONG THE ARC OF SAID CURVE 79.24 FEET; TANGENT SOUTH 17° 30' 35"; THENCE EAST 104.43 FEET, SOUTH 27° 05' 15" EAST 386.93 FEET AND SOUTH 20° 53' 35" EAST 25.83 FEET, MORE OR LESS, TO A POINT IN THE NORTHERLY LINE OF THE STRIP OF LAND DESCRIBED IN A DEED FROM MARBLEHEAD LAND COMPANY TO THE STATE OF CALIFORNIA RECORDED IN BOOK 16845 PAGE 253, OFFICIAL RECORDS, SAID LAST MENTIONED POINT BEING ON THE ARC OF A CURVE CONCAVE NORTHWESTERLY WITH A RADIUS OF 1450 FEET AND THE RADIAL BEARING TO SAID POINT BEING SOUTH 22° 47' 36" EAST; THENCE EASTERLY ALONG THE ARC OF SAID CURVE 590.71 FEET; THENCE TANGENT NORTH 43° 51' 45" EAST 12.21 FEET TO THE POINT OF BEGINNING.

EXCEPT ALL RIPARIAN RIGHTS OF SAID LANDS AND ALL MINERALS, OIL, PETROLEUM, ASPHALTUM, GAS, COAL AND OTHER HYDROCARBON SUBSTANCES IN, ON, WITHIN AND UNDER SAID LANDS BUT WITHOUT SURFACE RIGHT TO GO UPON SAID LANDS TO EXTRACT SAID SUBSTANCES AS CONTAINED IN DEED FROM MARBLEHEAD LAND COMPANY, A

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Attachment B



CORPORATION RECORDED FEBRUARY 14, 1944 IN BOOK 20657 PAGE 140, OFFICIAL RECORDS.

ALSO EXCEPT THEREFROM THAT PORTION OF SAID LAND CONVEYED TO THE STATE OF CALIFORNIA BY A DEED RECORDED NOVEMBER 16, 1948 AS INSTRUMENT NO. 2085 IN BOOK 28732 PAGE 310, OFFICIAL RECORDS.

PARCEL 2:

A PARCEL OF LAND BEING A RANCHO TOPANGA MALIBU SEQUIT, AS CONFIRMED TO MATTHEW KELLER BY PATENT RECORDED IN BOOK 1 PAGE 407 ET SEQ., OF PATENTS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE NORTHERLY LINE OF THE STRIP OF LAND DESCRIBED IN A DEED FROM MARBLEHEAD LAND COMPANY TO THE STATE OF CALIFORNIA, RECORDED IN BOOK 16845 PAGE 253, OFFICIAL RECORDS AT THE NORTHEASTERLY EXTREMITY OF THE COURSE DESCRIBED AS "NORTH 43° 51' 45" EAST 189.63 FEET" IN THE DEED TO THE MYLES EDWARD CONNOLLY AND WIFE RECORDED IN BOOK 20657 PAGE 146, OFFICIAL RECORDS; THENCE ALONG THE BOUNDARY OF THE LAND DESCRIBED IN SAID DEED TO CONNOLLY AND WIFE; NORTH 46° 00' 15" WEST 192.92 FEET AND NORTH 31° 32' 55" EAST 193.51 FEET; THENCE SOUTH 45° 44' 11" EAST 234.25 FEET TO A POINT IN THE NORTHWESTERLY LINE BEING A CURVE CONCAVE SOUTHEASTERLY HAVING A RADIUS OF 2060 FEET, THE RADIAL BEARING TO SAID POINT BEING NORTH 45° 44' 11" WEST; THENCE ALONG SAID NORTHWESTERLY LINE SOUTHWESTERLY ALONG SAID CURVE 14.42 FEET AND SOUTH 43° 51' 45" WEST 173.00 FEET TO THE POINT OF BEGINNING.

EXCEPT THEREFROM ALL MINERALS, OIL, PETROLEUM, ASPHALTUM, GAS, COAL AND OTHER HYDROCARBON SUBSTANCES IN, ON, WITHIN AND UNDER SAID LANDS AND EVERY PART THEREOF BUT WITHOUT RIGHT OF ENTRY, AS RESERVED BY MARBLEHEAD LAND COMPANY IN DEED RECORDED OCTOBER 17, 1944 IN BOOK 21321 PAGE 347, OFFICIAL RECORDS.

ALSO EXCEPT THEREFROM THAT PORTION OF SAID LAND CONVEYED TO THE STATE OF CALIFORNIA, BY DEED RECORDED NOVEMBER 16, 1948 AS INSTRUMENT NO. 2085 IN BOOK 28732 PAGE 310, OFFICIAL RECORDS.

PARCEL 3:

A. AN EASEMENT FOR ROAD PURPOSES TO BE USED IN COMMON WITH OTHERS OVER A STRIP OF LAND 40 FEET IN WIDTH, THE CENTER LINE OF WHICH IS DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEASTERLY EXTREMITY OF THE COURSE DESCRIBED AS NORTH 62° 09' 00" WEST 123.16 FEET IN THE DESCRIPTION OF THE PARCEL HEREIN CONVEYED; THENCE NORTH 62° 09' 00" WEST 123.16 FEET TO THE BEGINNING OF TANGENT CURVE CONCAVE NORTHEASTERLY WITH A RADIUS OF 229.33 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF SAID CURVE 262.44 FEET; THENCE TANGENT NORTH 03° 25' 05" EAST 36.35 FEET TO THE BEGINNING OF TANGENT CURVE CONCAVE WESTERLY WITH A RADIUS OF 136.48 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF SAID CURVE 129.36 FEET TO THE BEGINNING OF A COMPOUND CURVE CONCAVE SOUTHERLY WITH A RADIUS OF 91.02 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE 138.63 FEET; THENCE TANGENT SOUTH 41° 50' 55" WEST 114.41 FEET, MORE OR LESS TO A POINT IN THE CENTER LINE OF THE EASEMENT FOR ROAD AND HIGHWAY PURPOSES 50 FEET IN WIDTH DESCRIBED IN A DEED FROM MARBLEHEAD LAND COMPANY TO SANGER W. CRUMPACKER ET AL., RECORDED JANUARY 22, 1944 IN BOOK 20517 PAGE 382, OFFICIAL RECORDS, SAID LAST MENTIONED POINT BEING NORTH 20° 32' 35" EAST 124.79 FEET FROM THE SOUTHWESTERLY EXTREMITY OF THAT

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CERTAIN COURSE DESCRIBED IN SAID DEED AS NORTH 20° 32' 35" EAST 158.00 FEET.

EXCEPT THEREFROM THAT PORTION THEREOF INCLUDED WITHIN THE LINE OF PARCEL 1.

B. AN EASEMENT FOR ROAD PURPOSES TO BE USED IN COMMON WITH OTHERS OVER A STRIP OF LAND 50 FEET IN WIDTH LYING 25 FEET ON EACH SIDE OF A CENTER LINE DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE CENTER LINE DESCRIBED IN THE DEED TO SANGER W. CRUMPACKER ET AL., RECORDED JANUARY 22, 1944 IN BOOK 20517 PAGE 382, OFFICIAL RECORDS DISTANT THEREON NORTH 20° 32' 35" EAST 124.79 FEET FROM THE SOUTHWESTERLY TERMINUS OF THAT COURSE DESCRIBED IN SAID DEED AS NORTH 20° 32' 35" EAST 158.00 FEET; THENCE SOUTH 26° 32' 35" WEST 124.79 FEET TO THE BEGINNING OF TANGENT CURVE CONCAVE EASTERLY HAVING A RADIUS OF 206.84 FEET; THENCE ALONG SAID CURVE AND SAID CENTER LINE SOUTHERLY 130.93 FEET TO THE BEGINNING OF A REVERSE CURVE CONCAVE WESTERLY HAVING A RADIUS OF 178.67 FEET; THENCE SOUTHERLY ALONG SAID CURVE AND CENTER LINE 136.89 FEET TO THE BEGINNING OF A COMPOUND CURVE CONCAVE NORTHWESTERLY HAVING A RADIUS OF 487.46 FEET; THENCE SOUTHWESTERLY ALONG SAID CURVE 221.52 FEET TO THE NORTHWESTERLY TERMINUS OF THE COURSE IN THE BOUNDARY OF THE LAND ABOVE DESCRIBED AS NORTH 44° 07' 06" WEST 158.98 FEET; THENCE ALONG SAID BOUNDARY AS FOLLOWS:

SOUTH 55° 19' 33" WEST 229.74 FEET TO THE BEGINNING OF TANGENT CURVE CONCAVE SOUTHEASTERLY WITH A RADIUS OF 183.32 FEET SOUTHWESTERLY ALONG THE ARC OF SAID CURVE 171.24 FEET TANGENT SOUTH 01° 48' 25" WEST 256.55 FEET TO THE BEGINNING OF TANGENT CURVE CONCAVE SOUTHEASTERLY WITH A RADIUS OF 235.04 FEET SOUTHERLY ALONG THE ARC OF SAID CURVE 79.24 FEET TANGENT SOUTH 17° 30' 35" EAST 104.43 FEET, SOUTH 27° 05' 15" EAST 386.93 FEET AND SOUTH 20° 53' 35" EAST 25.83 FEET, MORE OR LESS, TO A POINT IN THE NORTHERLY LINE OF THE STRIP OF LAND DESCRIBED IN A DEED FROM MARBLEHEAD LAND COMPANY TO THE STATE OF CALIFORNIA, RECORDED IN BOOK 16845 PAGE 253, OFFICIAL RECORDS.

EXCEPT THEREFROM THAT PORTION THEREOF INCLUDED WITHIN THE LINES OF PARCEL 1.

APN: 4452-017-009 and 4452-019-001

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge George H. Wu and the assigned discovery Magistrate Judge is Suzanne H. Segal.

The case number on all documents filed with the Court should read as follows:

**CV11- 3582 GW (SSx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

☒ **Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

☐ **Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

☐ **Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA**  
**CIVIL COVER SHEET**

COPY

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> ) United States of America	<b>DEFENDANTS</b> One white crystal-covered "Bad Tour" glove and other Michael Jackson memorabilia, et al.
<b>(b) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)  Steven R. Welk, Assistant United States Attorney 1400 United States Courthouse, 312 North Spring Street Los Angeles, California 90012; Telephone: (213)894-6166 Fax: (213) 894-7177	<b>Attorneys (If Known)</b>

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input checked="" type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:35%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> <td style="width:45%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

**IV. ORIGIN** (Place an X in one box only.)  
☒ 1 Original Proceeding    
 ☐ 2 Removed from State Court    
 ☐ 3 Remanded from Appellate Court    
 ☐ 4 Reinstated or Reopened    
 ☐ 5 Transferred from another district (specify):    
 ☐ 6 Multi-District Litigation    
 ☐ 7 Appeal to District Judge from Magistrate Judge

**V. REQUESTED IN COMPLAINT:** JURY DEMAND: ☐ Yes     ☒ No (Check 'Yes' only if demanded in complaint.)  
**CLASS ACTION** under F.R.C.P. 23: ☐ Yes     ☒ No    
 **MONEY DEMANDED IN COMPLAINT:** \$ \_\_\_\_\_

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
 18 U.S.C. §§ 981(a)(1)(A) and (C)

**VII. NATURE OF SUIT** (Place an X in one box only.)
 

<b>OTHER STATUTES</b> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<b>CONTRACT</b> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>TORTS</b> <b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>TORTS</b> <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER</b> <b>PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <b>FORFEITURE / PENALTY</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input checked="" type="checkbox"/> 690 Other	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV11-03582

**FOR OFFICE USE ONLY:** Case Number: \_\_\_\_\_

**AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.**

