Department of Administration
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Attorney for the Department of Administration

IN THE DISTRICT COURT OF GUAM

UNITED STATES OF AMERICA Plaintiff, vs. APPROXIMATELY $564,123.00 IN U.S. CURRENCY SEIZED FROM JP MORGAN CHASE BANK ACCOUNT NO. ENDING IN 8072, HELD IN THE NAME OF KCORDIER SERVICES LLC (DBA CORDIER SERVICES), and APPROXIMATELY $456,377.00 IN U.S. CURRENCY SEIZED FROM JP MORGAN CHASE BANK ACCOUNT NO. ENDING IN 2685, HELD IN THE NAME OF KCORDIER SERVICES LLC (DBA CORDIER SERVICES), Defendants.	CIVIL CASE NO. CV 26-00021 **VERIFIED CLAIM OF THE DEPARTMENT OF ADMINISTRATION**

Claimant, The Department of Administration, Government of Guam, through its duly authorized representative, hereby files this Claim pursuant to Federal Rule of Civil Procedure, Supplemental Rule G(5), and asserts its ownership interest in the Defendant Property described in the Verified Complaint for Forfeiture in Rem.

1. Claimant is the Department of Administration, Government of Guam.

2. Claimant asserts and ownership interest in the following specific Defendant Property:

   a. Approximately $564,123.00 in United States currency seized from JP Morgan Chase Bank account number ending in 8072, held in the name of KCordier Services LLC (DBA Cordier Services); and

   b. Approximately $456,377.00 in United States currency seized from JP Morgan Chase Bank account number ending in 2685, held in the name of KCordier Services LLC (DBA Cordier Services).

3. Claimant asserts that it is the owner of the Defendant Property identified above, and attaches hereto as Exhibit "A", a copy of the IC3 Complaint filed on February 24, 2026 (EST).

4. Claimant filed this Claim for the purpose of asserting its ownership interest and contesting the forfeiture of the Defendant Property to the United States.

5. Claimant does not concede that the Defendant Property is subject to forfeiture under 18 U.S.C. § 981(a)(1)(C), or under any other provision of law.

6. Claimant reserves all rights, defenses, objections, claims, and remedies available under applicable federal and territorial law.

PRAYER FOR RELIEF

WHEREFORE, the Department of Administration, Government of Guam, prays that:

1. The Court accept and file this Claim;

2. The Court recognize the Department of Administration, Government of Guam, as a claimant having an exclusive ownership interest in the Defendant Property;
3. The Court deny the United States' request for forfeiture of the Defendant Property;
4. The Court enter a judgment granting ownership of the Defendant Property to the Department of Administration, Government of Guam;
5. The Court grant such other relief as may be just and proper.

Respectfully submitted this 18th day of September, 2026.

DEPARTMENT OF ADMINISTRATION

By: _____
D. GRAHAM BOTHA
Attorney for Department of Administration

CERTIFICATE OF SERVICE

I declare under penalty of perjury under the laws of Guam that on September 18, 2026, I electronically filed the foregoing document with the Clerk of Court for the United States District Court of Guam using the CM/ECF system and that immediately after filing the above document I will cause it to be served upon the parties as authorized by law.

Executed at Tamuning, Guam, on September 18, 2026.

_____
D. GRAHAM BOTHA

VERIFICATION

I, Edward Birn, being duly authorized to act on behalf of the Department of Administration, Government of Guam, declare under penalty of perjury that I have read the foregoing Verified Claim and that the factual statements concerning the Claimant's identity, ownership interest, and the Defendant Property claimed are true and correct to the best of my knowledge and belief.

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

Dated: September 18, 2026.

Edward Birn
Director, Department of Administration

Your IC3 Complaint

Submission ID:	de59f20af014414f9bb1ccc8d2e71638
Date Filed:	2/24/2026 6:54:00 PM EST
Were you the one affected in this incident?	No

Your Contact Information

Name:	Maryann San Nicolas
Business Name:	Department of Administration, Government of Guam
Phone Number:	[redacted]
Email Address:	maryann.sannicolas@doa.guam.gov

Complainant Information

Name:	Maryann Taijeron San Nicolas
Age:	50 - 59
Address:	P.O. BOX 7420
City:	Tamuning
County:	GU
Country:	United States of America
State:	Guam
Zip Code/Route:	96931

EXHIBIT "A"

Phone Number:	[redacted]
Email Address:	maryann.sannicolas@doa.guam.gov

Business Information

Is this on behalf of a business that was targeted by a Cyber incident?	Yes
Business Name:	Government of Guam; Department of Administration
Is the incident currently impacting business operations?	No
Business IT POC:	Ms. Theresa Rivers, CFO
Other Business POC:	Ms. Tammy Batac, Acting Accounting Supervisor
If your business or organization is defined as a critical infrastructure entity, select the sector below:	Financial Services
If known or applicable, please select the critical infrastructure subsector:	Depository Institution

Financial Transaction(s)

Did you send or lose money in the incident?	Yes
What was your total loss amount?	1,790,724.45

Transaction Type:	Other
If other, please specify:	ACH/EFT
Was the money sent or lost?	Yes
Transaction Amount:	200.00
Transaction Date:	02/13/2026
Did you contact your bank, financial institution, or cryptocurrency exchange?	Yes
Originating Bank Name:	Bank of Guam
Originating Bank Address:	111 W. CHALAN SANTO PAPA
Originating Bank City:	HAGATANA
Originating Bank Country:	United States of America
Originating Bank State:	Guam
Originating Zip Code/Route:	96910
Originating Name on Account:	Government of Guam, Department of Administration
Originating Account Number:	[redacted]4399
Recipient Bank Name:	WELLS FARGO
Recipient Bank Country:	United States of America
Recipient Name on Account:	JUDICIARY OF GUAM
Recipient Bank Routing Number:	121042882
Recipient Account Number:	[redacted]5248

Transaction Type:	Other
If other, please specify:	ACH/EFT
Was the money sent or lost?	Yes
Transaction Amount:	107,441.45
Transaction Date:	02/18/2026
Did you contact your bank, financial institution, or cryptocurrency exchange?	Yes
Originating Bank Name:	BANK OF GUAM
Originating Bank Address:	111 W. CHALAN SANTO PAPA
Originating Bank Suite/Mail Stop:	maryann.sannicolas@doa.guam.gov
Originating Bank City:	HAGATNA
Originating Bank Country:	United States of America
Originating Bank State:	Guam
Originating Zip Code/Route:	96910
Originating Name on Account:	Government of Guam; Department of Administration
Originating Account Number:	[redacted]4592
Recipient Bank Name:	WELLS FARGO
Recipient Bank Country:	United States of America
Recipient Name on Account:	JUDICIARY OF GUAM

Recipient Bank Routing Number:	121042882
Recipient Account Number:	[redacted]5248
Transaction Type:	Other
If other, please specify:	ACH/EFT
Was the money sent or lost?	Yes
Transaction Amount:	1,683,083.00
Transaction Date:	02/18/2026
Did you contact your bank, financial institution, or cryptocurrency exchange?	Yes
Originating Bank Name:	BANK OF GUAM
Originating Bank Address:	111 W. CHALAN SANTO PAPA
Originating Bank Suite/Mail Stop:	maryann.sannicolas@doa.guam.gov
Originating Bank City:	HAGATNA
Originating Bank Country:	United States of America
Originating Bank State:	Guam
Originating Zip Code/Route:	96910
Originating Name on Account:	Government of Guam; Department of Administration
Originating Account Number:	[redacted]4399
Recipient Bank Name:	WELLS FARGO

Recipient Name on Account:	JUDICIARY OF GUAM
Recipient Bank Routing Number:	121042882
Recipient Account Number:	[redacted]5248

Information About The Subject(s)

Name:	Raymond E. Guevara
Business Name:	Department of Administration, Government of Guam
Address:	P.O. BOX7420
City:	Tamuning
Country:	United States of America
Zip Code/Route:	96931
Phone Number:	[redacted]
Email Address:	Raymond.Guevara@doa.guam.gov

Name:	Nadine SQ Sanchez
Business Name:	Department of Administration; Government of Guam
Address:	P.O. Box 7420
City:	Tamuning
Country:	United States of America
State:	Guam
Zip Code/Route:	96931

Phone Number:	[redacted]
Email Address:	Nadine.Sanchez@doa.guam.gov
Name:	Maryann T. San Nicolas
Business Name:	Department of Administration; Government of Guam
Address:	P.O. Box 7420
City:	Tamuning
Country:	United States of America
State:	Guam
Zip Code/Route:	96931
Phone Number:	[redacted]
Email Address:	Maryann.Sannicolas@doa.guam.gov

Description of Incident

Provide a description of the incident and how you (or those you are filling this out on behalf of) were victimized. Provide information not captured elsewhere in this complaint form:

The Government of Guam remits via ACH/EFT, monthly allotments to various autonomous Government agencies. An individual claiming to be Jenelyn S. Benlot, a Management Officer for the Judiciary of Guam, explains that they are currently having issues with their previous bank account and that the remittance will now need to be sent to another bank account. She provided her acceptable forms of identifications and her email address was showing as being from the Judiciary's. Ray Guevara, Accountant, forwarded the email to Nadine Sanchez, Accounting Technician, to update the vendor information in our Financial system. The real

person from the court contacted Nadine about a week later informing her that they had not yet received the first payment of $200.00. Nadine gave her the information provided by Jenelyn S. Benlot and was told that there was nothing wrong with their bank account and that the allotment should have gone to the original bank account. By the time our accounting team realized the mistake, there were two additional remittances that had been sent. I have reported this to our local Guam Police Department yesterday.

Other Information

Are there any other witnesses or persons affected by this incident?

Judiciary of Guam (Guam Courts) personnel, our staff were communicating with
Joyceline C. Salumbides
Sophia Diaz, Deputy Administrator

If you have reported this incident to other law enforcement or government agencies, please provide the name, phone number, email, date reported, report number, etc.

Guam Police Department, Officer Guardian
jorem.guardian@gpd.guam.gov

Case# 2026-4996

Is this an update to a previously filed complaint? No

Privacy & Signature:

The collection of information on this form is authorized by one or more of the following statutes: 18 U.S.C. § 1028 (false documents and identity theft); 1028A (aggravated identity theft); 18 U.S.C. §

1029 (credit card fraud); 18 U.S.C. § 1030 (computer fraud); 18 U.S.C. § 1343 (wire fraud); 18 U.S.C 2318B (counterfeit and illicit labels); 18 U.S.C. § 2319 (violation of intellectual property rights); 28 U.S.C. § 533 (FBI authorized to investigate violations of federal law for which it has primary investigative jurisdiction); and 28 U.S.C. § 534 (FBI authorized to collect and maintain identification, criminal information, crime, and other records).

The collection of this information is relevant and necessary to document and investigate complaints of Internet-related crime. Submission of the information requested is voluntary; however, your failure to supply requested information may impede or preclude the investigation of your complaint by law enforcement agencies.

The information collected is maintained in one or more of the following Privacy Act Systems of Records: the FBI Central Records System, Justice/FBI-002, notice of which was published in the Federal Register at 63 Fed. Reg. 8671 (Feb. 20, 1998); the FBI Data Warehouse System, DOJ/FBI-022, notice of which was published in the Federal Register at 77 Fed. Reg. 40631 (July 10, 2012). Descriptions of these systems may also be found at www.justice.gov/opcl/doj-systems-records#FBI. The information collected may be disclosed in accordance with the routine uses referenced in those notices or as otherwise permitted by law. For example, in accordance with those routine uses, in certain circumstances, the FBI may disclose information from your complaint to appropriate criminal, civil, or regulatory law enforcement authorities (whether federal, state, local, territorial, tribal, foreign, or international). Information also may be disclosed as a routine use to an organization or individual in both the public or private sector if deemed necessary to elicit information or cooperation from the recipient for use by the FBI in the performance of an authorized activity. "An example would be where the activities of an individual are disclosed to a member of the public in order to elicit his/her assistance in [FBI's]

apprehension or detection efforts." 63 Fed. Reg. 8671, 8682 (February 20, 1998).

By typing my name below, I understand and agree that this form of electronic signature has the same legal force and effect as a manual signature. I affirm that the information I provided is true and accurate to the best of my knowledge. I understand that providing false information could make me subject to fine, imprisonment, or both. (Title 18, U.S.Code, Section 1001)

Digital Signature: Maryann T. San Nicolas