

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT FOR NEW YORK

NOALA FRITZ; TERRY ABBOTT; JOHN ROBERT ALLMAN; RONNY KENT BATES; JAMES BAYNARD; JESS W. BEAMON; ALVIN BURTON BELMER; RICHARD D. BLANKENSHIP; JOHN W. BLOCKER; JOSEPH JOHN BOCCIA JR.; LEON BOHANNON; JOHN BONK JR.; JEFFREY JOSEPH BOULOS; JOHN NORMAN BOYETT; WILLIAM BURLEY; PAUL CALLAHAN; MECOT CAMARA; BRADLEY CAMPUS; JOHNNIE CEASAR; ROBERT ALLEN CONLEY; CHARLES DENNIS COOK; JOHNNY LEN COPELAND; DAVID COSNER; KEVIN COULMAN; RICK CRUDALE; RUSSELL CYZICK; MICHAEL DEVLIN; NATHANIEL DORSEY; TIMOTHY DUNNIGAN; BRYAN EARLE; DANNY R. ESTES; RICHARD ANDREW FLUEGEL; MICHAEL D. FULCHER; SEAN GALLAGHER; GEORGE GANGUR; RANDALL GARCIA; HAROLD GHUMM; TIMOTHY GIBLIN; MICHAEL GORCHINSKI; RICHARD GORDON; DAVIN M. GREEN; THOMAS HAIRSTON; MICHAEL HASKELL; MARK ANTHONY HELMS; STANLEY G. HESTER; DONALD WAYNE HILDRETH; RICHARD HOLBERTON; DR. JOHN HUDSON; MAURICE EDWARD HUKILL; EDWARD IACOVINO JR.; PAUL INNOCENZI III; JAMES JACKOWSKI; JEFFREY WILBUR JAMES; NATHANIEL WALTER JENKINS; EDWARD ANTHONY JOHNSTON; STEVEN JONES; THOMAS ADRIAN JULIAN; THOMAS KEOWN; DANIEL KLUCK; JAMES C. KNIPPLE; FREAS H. KREISCHER

Civil Action No. 25-cv-7093

**COMPLAINT FOR EXECUTION AND  
TURNOVER**

III; KEITH LAISE; JAMES LANGON IV; MICHAEL SCOTT LARIVIERE; STEVEN LARIVIERE; RICHARD LEMNAH; JOSEPH R. LIVINGSTON III; PAUL D. LYON JR.; JOHN MACROGLOU; SAMUEL MAITLAND JR.; CHARLIE ROBERT MARTIN; DAVID MASSA; JOHN MCCALL; JAMES E. MCDONOUGH; TIMOTHY R. MCMAHON; RICHARD MENKINS II; RONALD MEURER; JOSEPH PETER MILANO; JOSEPH MOORE; HARRY DOUGLAS MYERS; DAVID NAIRN; JOHN ARNE OLSON; JOSEPH ALBERT OWENS; CONNIE RAY PAGE; ULYSSES GREGORY PARKER; JOHN L. PEARSON; THOMAS S. PERRON; JOHN ARTHUR PHILLIPS JR.; WILLIAM ROY POLLARD; VICTOR MARK PREVATT; JAMES PRICE; PATRICK KERRY PRINDEVILLE; DIOMEDES J. QUIRANTE; WARREN RICHARDSON; LOUIS J. ROTONDO; MICHAEL CALEB SAULS; CHARLES JEFFREY SCHNORF; SCOTT LEE SCHULTZ; PETER SCIALABBA; GARY RANDALL SCOTT; THOMAS ALAN SHIPP; JERRY L. SHROPSHIRE; LARRY H. SIMPSON JR.; KIRK HALL SMITH; THOMAS GERARD SMITH; VINCENT SMITH; WILLIAM SCOTT SOMMERHOFF; STEPHEN EUGENE SPENCER; WILLIAM STELPFLUG; HORACE RENARDO STEPHENS JR.; CRAIG STOCKTON; JEFFREY STOKES; ERIC D. STURGHILL; DEVON SUNDAR; THOMAS PAUL THORSTAD; STEPHEN TINGLEY; DONALD H. VALLONE JR.; ERIC GLENN WASHINGTON; DWAYNE WIGGLESWORTH; RODNEY J. WILLIAMS; RODNEY J. WILLIAMS; SCIPIO WILLIAMS JR.; JOHNNY ADAM WILLIAMSON; WILLIAM ELLIS WINTER; DONALD

ELBERAN WOLLETT; CRAIG WYCHE;  
JEFFREY D. YOUNG; MARVIN ALBRIGHT;  
PABLO ARROYO; ANTHONY BANKS;  
RODNEY DARRELL BURNETTE; FRANK  
COMES JR.; GLENN DOLPHIN;  
FREDERICK DANIEL EAVES; CHARLES  
FRYE; TRUMAN DALE GARNER; LARRY  
GERLACH; JOHN HLYWIAK; ORVAL  
HUNTER; JOSEPH P. JACOBS; BRIAN  
KIRKPATRICK; BURNHAM MATTHEWS;  
TIMOTHY MITCHELL; LOVELLE  
“DARRELL” MOORE; JEFFREY NASHTON;  
JOHN OLIVER; PAUL RIVERS; STEPHEN  
RUSSELL; DANA SPAULDING; CRAIG  
JOSEPH SWINSON; MICHAEL TOMA;  
DANNY WHEELER; THOMAS D. YOUNG;  
LILLA WOOLLETT ABBEY; JAMES  
ABBOTT; ESTATE OF MARY ABBOTT;  
ELIZABETH ADAMS; EILEEN  
PRINDEVILLE AHLQUIST; MIRALDA  
ALARCON (JUDITH MAITLAND); ANNE  
ALLMAN; ROBERT ALLMAN; ESTATE OF  
THEODORE ALLMAN; DIANNE  
MARGARET ALLMAN; MARGARET E.  
ALVAREZ; KIMBERLY F. ANGUS; DONNIE  
BATES; JOHNNY BATES; LAURA BATES;  
MARGIE BATES; MONTY BATES; THOMAS  
BATES JR.; THOMAS C. BATES SR.; MARY  
E. BAUMGARTNER; ANTHONY BAYNARD;  
BARRY BAYNARD; EMERSON BAYNARD;  
PHILIP BAYNARD; THOMASINE  
BAYNARD; TIMOTHY BAYNARD; WAYNE  
BAYNARD; STEPHEN BAYNARD; ANNA  
BEARD; MARY ANN BECK; ALUE  
BELMER; ANNETTE BELMER; CLARENCE  
BELMER; COLBY KEITH BELMER;  
DENISE BELMER; DONNA BELMER; FAYE  
BELMER; KENNETH BELMER; LUDDIE  
BELMER; SHAWN BIELLOW; MARY  
FRANCES BLACK; DONALD

BLANKENSHIP JR.; DONALD  
BLANKENSHIP SR.; ESTATE OF MARY  
BLANKENSHIP; ALICE BLOCKER;  
DOUGLAS BLOCKER; JOHN R. BLOCKER;  
ROBERT BLOCKER; JAMES BOCCIA;  
JOSEPH BOCCIA SR.; PATRICIA BOCCIA;  
RAYMOND BOCCIA; RICHARD BOCCIA;  
RONNIE (VERONICA) BOCCIA; LETICIA  
BODDIE; ANGELA BOHANNON;  
ANTHONY BOHANNON; CARRIE  
BOHANNON; DAVID BOHANNON; EDNA  
BOHANNON; LEON BOHANNON SR.;  
RICKI BOHANNON; BILLIE JEAN  
BOLINGER; JOSEPH BOULOS; LYDIA  
BOULOS; MARIE BOULOS; REBECCA  
BOWLER; LAVON BOYETT; ESTATE OF  
NORMAN E. BOYETT JR.; THERESA U.  
ROTH BOYETT; WILLIAM A. BOYETT;  
SUSAN SCHNORF BREEDEN; DAIMON  
BRISCOE; CHRISTINE BROWN; ROSANNE  
BRUNETTE; MARY LYNN BUCKNER;  
ESTATE OF CLAUDE BURLEY; ESTATE OF  
WILLIAM DOUGLAS BURLEY; MYRA  
BURLEY; KATHLEEN CALABRO; RACHEL  
CALDERA; AVENELL CALLAHAN;  
MICHAEL CALLAHAN; PATRICIA (“PATSY  
ANN”) CALLOWAY; ELISA ROCK  
CAMARA; THERESA RIGGS CAMARA;  
CANDACE CAMPBELL; CLARE CAMPUS;  
ELAINE CAPOBIANCO; FLORENCE  
MARTIN CARTER; PHYLLIS A. CASH;  
THERESA CATANO; BRUCE CEASAR;  
FRANKLIN CEASAR; FREDRICK CEASAR;  
ROBBIE NELL CEASAR; ROBBIE NELL  
CEASAR; SYBIL CEASAR; CHRISTINE  
DEVLIN CECCA; TAMMY CHAPMAN;  
JAMES CHERRY; SONIA CHERRY; ADELE  
H. CHIOS; JANA M. CHRISTIAN; SHARON  
ROSE CHRISTIAN; SUSAN CIUPASKA;  
LESHUNE STOKES CLARK; ROSEMARY

CLARK; MARY ANN COBBLE; KAREN SHIPP COLLARD; JENNIFER COLLIER; MELIA WINTER COLLIER; DEBORAH M. COLTRANE; JAMES N. CONLEY JR.; ROBERTA LI CONLEY; CHARLES F. COOK; ELIZABETH A. COOK; ESTATE OF MARY A COOK; ALAN TRACY COPELAND; BETTY COPELAND; DONALD COPELAND; BLANCHE CORRY; HAROLD COSNER; JEFFREY COSNER; LEANNA COSNER; ESTATE OF MARVA LYNN COSNER; CHERYL COSSABOOM; BRYAN THOMAS COULMAN; CHRISTOPHER J. COULMAN; DENNIS P. COULMAN; LORRAINE M. COULMAN; ROBERT D. COULMAN; ROBERT LOUIS COULMAN; CHARLITA MARTIN COVINGTON; AMANDA CROUCH; MARIE CRUDALE; EUGENE CYZICK; LYNN DALLACHIE; ANNE DEAL; LYNN SMITH DERBYSHIRE; THERESA DESJARDINS; CHRISTINE DEVLIN; DANIEL DEVLIN; GABRIELLE DEVLIN; RICHARD DEVLIN; SEAN DEVLIN; ROSALIE DONAHUE (MILANO); ASHLEY DORAY; REBECCA DOSS; CHESTER DUNNIGAN; ELIZABETH ANN DUNNIGAN; MICHAEL DUNNIGAN; WILLIAM DUNNIGAN; CLAUDINE DUNNIGAN; JANICE THORSTAD EDQUIST; MARY RUTH ERVIN; BARBARA ESTES; CHARLES ESTES; FRANK ESTES; LORI FANSLER; ANGELA DAWN FARTHING; ARLINGTON FERGUSON; HILTON FERGUSON; LINDA SANDBACK FISH; NANCY BROCKSBACK FOX; TIA FOX; TAMMY FRESHOUR; RUBY FULCHER; BARBARA GALLAGHER; BRIAN GALLAGHER; ESTATE OF JAMES GALLAGHER; JAMES GALLAGHER JR.; KEVIN GALLAGHER; MICHAEL

GALLAGHER; DIMITRI GANGUR; MARY GANGUR; JESS GARCIA; RONALD GARCIA; ROXANNE GARCIA; RUSSELL GARCIA; VIOLET GARCIA; SUZANNE PERRON GARZA; JEANNE GATTEGNO; ARLENE GHUMM; ASHLEY GHUMM; BILL GHUMM; EDWARD GHUMM; HILDEGARD GHUMM; ESTATE OF JEDAIAH GHUMM; JESSE GHUMM; LEROY GHUMM; MORONICA GHUMM; DONALD GIBLIN; JEANNE GIBLIN; MICHAEL GIBLIN; TIFFANY GIBLIN; VALERIE GIBLIN; WILLIAM GIBLIN; THAD GILFORD-SMITH; REBECCA GINTONIO; DAWN GOFF; CHRISTINA GORCHINSKI; JUDY GORCHINSKI; KEVIN GORCHINSKI; VALERIE GORCHINSKI; ALICE GORDON; JOSEPH GORDON; LINDA GORDON; ESTATE OF NORRIS GORDON; PAUL GORDON; ANDREA GRANT; DEBORAH GRAVES; DEBORAH GREEN; LIBERTY QUIRANTE GREGG; ALEX GRIFFIN; CATHERINE E. GRIMSLEY; MEGAN GUMMER; LYDA WOLLETT GUZ; DARLENE HAIRSTON; TARA HANRAHAN; MARY CLYDE HART; BRENDA HASKILL; JEFFREY HASKELL; KATHLEEN S. HEDGE; CHRISTOPHER TODD HELMS; MARVIN R. HELMS; DORIS HESTER; CLIFTON HILDRETH; JULIA HILDRETH; MARY ANN HILDRETH; MICHAEL WAYNE HILDRETH; SHARON A HILTON; DONALD HOLBERTON; PATRICIA LEE HOLBERTON; THOMAS HOLBERTON; TANGIE HOLLIFIELD; DEBRA HORNER; ELIZABETH HOUSE; JOYCE A HOUSE; TAMMY CAMARA HOWELL; LISA H. HUDSON; LORENZO HUDSON; LUCY HUDSON; RUTH HUDSON; ESTATE OF SAMUEL HUDSON; WILLIAM J. HUDSON;

ESTATE OF SUSAN THORSTAD HUGIS;  
NANCY TINGLEY HURLBERT; CYNTHIA  
PERRON HURSTON; ESTATE OF EDWARD  
IACOVINO SR.; ELIZABETH IACOVINO;  
DEBORAH INNOCENZI; KRISTIN  
INNOCENZI; MARK INNOCENZI; PAUL  
INNOCENZI IV; BERNADETTE JACCOM;  
JOHN JACKOWSKI JR.; JOHN JACKOWSKI  
SR.; VICTORIA JACOBUS; ELAINE JAMES;  
NATHALIE C. JENKINS; STEPHEN  
JENKINS; REBECCA JEWETT; LINDA  
MARTIN JOHNSON; RAY JOHNSON;  
RENNITTA STOKES JOHNSON; SHERRY  
JOHNSON; CHARLES JOHNSTON; EDWIN  
JOHNSTON; MARY ANN JOHNSTON;  
ZANDRA LARIVIERE JOHNSTON; ALICIA  
JONES; CORENE MARTIN JONES; KIA  
BRISCOE JONES; MARK JONES; OLLIE  
JONES; SANDRA D. JONES; ESTATE OF  
SYNOVURE JONES; ROBIN COPELAND  
JORDAN; SUSAN SCOTT JORDAN; JOYCE  
JULIAN; KARL JULIAN; NADA JURIST;  
ADAM KEOWN; BOBBY KEOWN JR.;  
BOBBY KEOWN SR.; DARREN KEOWN;  
WILLIAM KEOWN; MARY JOE KRIKER;  
KELLY KLUCK; MICHAEL KLUCK;  
ESTATE OF JOHN D. KNIPPLE; JOHN R.  
KNIPPLE; ESTATE OF PAULINE KNIPPLE;  
SHIRLEY L. KNOX; DOREEN KREISCHER;  
FREAS H. KREISCHER JR.; CYNTHIA D.  
LAKE; WENDY L. LANGE; JAMES  
LANGON III; EUGENE LARIVIERE; JANET  
LARIVIERE; JOHN M. LARIVIERE; LESLEY  
LARIVIERE; MICHAEL LARIVIERE;  
NANCY LARIVIERE; RICHARD  
LARIVIERE; ESTATE OF RICHARD G.  
LARIVIERE; ROBERT LARIVIERE;  
WILLIAM LARIVIERE; CATHY L.  
LAWTON; HEIDI CRUDALE LEGAULT;  
ESTATE OF CLARENCE LEMNAH; ETTA

LEMNAH; FAY LEMNAH; HAROLD LEMNAH; MARLYS LEMNAH; ROBERT LEMNAH; RONALD LEMNAH; ANNETTE R. LIVINGSTON; JOSEPH R. LIVINGSTON IV; ESTATE OF JOSEPH R. LIVINGSTON JR.; ROBIN M. LYNCH; EARL LYON; FRANCISCO LYON; JUNE LYON; MARIA LYON; PAUL D. LYON SR.; VALERIE LYON; HEATHER MACROGLOU; KATHLEEN DEVLIN MAHONEY; KENTY MAITLAND; LEYSNAL MAITLAND; SAMUEL MAITLAND SR.; SHIRLA MAITLAND; VIRGINIA BOCCIA MARSHALL; JOHN MARTIN; PACITA MARTIN; RENEIRO MARTIN; RUBY MARTIN; SHIRLEY MARTIN; MARY MASON; CRISTINA MASSA; EDMUND MASSA; JOAO (“JOHN”) MASSA; JOSE (“JOE”) MASSA; MANUEL MASSA JR.; RAMIRO MASSA; MARY MCCALL; ESTATE OF THOMAS MCCALL; VALERIE MCCALL; GAIL MCDERMOTT; JULIA A. MCFARLIN; GEORGE MCMAHON; MICHAEL MCMAHON; PATTY MCPHEE; DARREN MENKINS; GREGORY MENKINS; MARGARET MENKINS; RICHARD H. MENKINS; JAY T. MEURER; JOHN MEURER; JOHN THOMAS MEURER; MARY LOU MEURER; MICHAEL MEURER; PENNY MEYER; ANGELA MILANO; PETER MILANO JR.; EARLINE MILLER; HENRY MILLER; PATRICIA MILLER; HELEN MONTGOMERY; BETTY MOORE; HARRY MOORE; KIMBERLY MOORE; MARY MOORE; MELISSA LEA MOORE; ESTATE OF MICHAEL MOORE; ELIZABETH PHILLIPS MOY; DEBRA MYERS; GENEVA MYERS; HARRY A. MYERS; BILLIE ANN NAIRN; CAMPBELL J. NAIRN III; ESTATE OF CAMPBELL J. NAIRN JR.; WILLIAM P. NAIRN; RICHARD NORFLEET; DEBORAH

O'CONNOR; PEARL OLANIJI; ESTATE OF BERTHA OLSON; KAREN L. OLSON; RANDAL D. OLSON; ROGER S. OLSON; RONALD J. OLSON; ESTATE OF SIGURD OLSON; DAVID OWENS; DEANNA OWENS; FRANCES OWENS; ESTATE OF JAMES OWENS; STEVEN OWENS; CONNIE MACK PAGE; JUDITH K. PAGE; LISA MENKINS PALMER; GERALDINE PAOLOZZI; MAUREEN PARE; HENRY JAMES PARKER; SHARON PARKER; HELEN M. PEARSON; JOHN L. PEARSON JR.; SONIA PEARSON; BRETT PERRON; DEBORAH JEAN PERRON; MICHELLE PERRON; RONALD R. PERRON; MURIEL PERSKY; DEBORAH D. PETERSON; SHARON CONLEY PETRY; SANDRA PETRICK; DONNA VALLONE PHELPS; HAROLD PHILLIPS; JOHN ARTHUR PHILLIPS SR.; DONNA TINGLEY PLICKYS; MARGARET AILEEN POLLARD; STACEY YVONNE POLLARD; LEE HOLLAN PREVATT; JOHN PRICE; JOSEPH PRICE; ESTATE OF BARBARA D. PRINDEVILLE; KATHLEEN TARA PRINDEVILLE; MICHAEL PRINDEVILLE; PAUL PRINDEVILLE; SEAN PRINDEVILLE; BELINDA J. QUIRANTE; EDGAR QUIRANTE; ESTATE OF GODOFREDO QUIRANTE; MILTON QUIRANTE; SABRIDA QUIRANTE; SUSAN RAY; LAURA M. RENINGER; ALAN RICHARDSON; BEATRICE RICHARDSON; CLARENCE RICHARDSON; ERIC RICHARDSON; LYNETTE RICHARDSON; VANESSA RICHARDSON; PHILIECE RICHARDSON-MILLS; MELROSE RICKS; BELINDA QUIRANTE RIVA; BARBARA ROCKWELL; LINDA ROONEY; TARA ROSE SMITH; TAMMI RUARK; JULIANA RUDKOWSKI; MARIE MCMAHON

RUSSELL; ALICIA LYNN SANCHEZ;  
ANDREW SAULS; HENRY CALEB SAULS;  
RILEY A. SAULS; MARGARET MEDLER  
SCHNORF; RICHARD SCHNORF  
(BROTHER); RICHARD SCHNORF  
(FATHER); ROBERT SCHNORF; BEVERLY  
SCHULTZ; DENNIS JAMES SCHULTZ;  
DENNIS RAY SCHULTZ; FRANK  
SCIALABBA; JACQUELINE SCIALABBA;  
SAMUEL SCOTT SCIALABBA; JON  
CHRISTOPHER SCOTT; KEVIN JAMES  
SCOTT; ESTATE OF LARRY L. SCOTT;  
MARY ANN SCOTT; SHERIA SCOTT;  
STEPHEN ALLEN SCOTT; JACKLYN  
SEGUERRA; BRYAN RICHARD SHIPP;  
JAMES DAVID SHIPP; JANICE SHIPP;  
MAURICE SHIPP; PAULINE SHIPP;  
RAYMOND DENNIS SHIPP; RUSSELL  
SHIPP; SUSAN J. SINSOCO; ANA SMITH-  
WARD; ESTATE OF ANGELA JOSEPHINE  
SMITH; BOBBIE ANN SMITH; CYNTHIA  
SMITH; DONNIA MARIE SMITH; ERMA  
SMITH; HOLLY SMITH; IAN SMITH; JANET  
SMITH; JOSEPH K. SMITH III; JOSEPH K.  
SMITH JR.; KEITH SMITH; KELLY B.  
SMITH; SHIRLEY L. SMITH; TADGH  
SMITH; TERRENCE SMITH; TIMOTHY B.  
SMITH; JOCELYN J. SOMMERHOF; JOHN  
SOMMERHOFF; WILLIAM J.  
SOMMERHOF; DOUGLAS SPENCER;  
CHRISTY WILLIFORD STELPFLUG;  
JOSEPH STELPFLUG; KATHY NATHAN  
STELPFLUG; LAURA BARFIELD  
STELPFLUG; PEGGY STELPFLUG;  
WILLIAM STELPFLUG; HORACE  
STEPHENS SR.; JOYCE STEPHENS; KEITH  
STEPHENS; DONA STOCKTON; ESTATE OF  
DONALD STOCKTON; RICHARD  
STOCKTON; IRENE STOKES; NELSON  
STOKES JR.; ESTATE OF NELSON STOKES

SR.; ROBERT STOKES; GWENN STOKES-GRAHAM; MARCUS D. STURGHILL; MARCUS L. STURGHILL JR.; NAKEISHA LYNN STURGHILL; DOREEN SUNDAR; MARGARET TELLA; SUSAN L. TERLSON; MARY ELLEN THOMPSON; ADAM THORSTAD; MARY ELLEN THOMPSON; ADAM THORSTAD; BARBARA THORSTAD; JAMES THORSTAD JR.; JAMES THORSTAD SR.; JOHN THORSTAD; RYAN THORSTAD; BETTY ANN THURMAN; BARBARA TINGLEY; RICHARD L. TINGLEY; RUSSELL TINGLEY; KEYSHA TOLLIVER; MARY ANN TUREK; KAREN VALENTI; ANTHONY VALLONE; DONALD H. VALLONE; TIMOTHY VALLONE; LEONA MAE VARGAS; DENISE VOYLES; ILA WALLACE; KATHRYN THORSTAD WALLACE; RICHARD J. WALLACE; BARBARA THORSTAD WARWICK; LINDA WASHINGTON; VANCINE WASHINGTON; KENNETH WATSON; DIANE WHITENER; DARYL WIGGLESWORTH; DARRIN A. WIGGLESWORTH; HENRY WIGGLESWORTH; MARK WIGGLESWORTH; ROBYN WIGGLESWORTH; SANDRA WIGGLESWORTH; SHAWN WIGGLESWORTH; DIANNE STOKES WILLIAMS; GUSSIE MARTIN WILLIAMS; JANET WILLIAMS; JOHNNY WILLIAMS; RHONDA WILLIAMS, RONALD WILLIAMS; RUTH WILLIAMS; SCIPIO J. WILLIAMS; WESLEY WILLIAMS; DELMA WILLIAMS-EDWARDS; TONY WILLIAMSON; JEWELENE WILLIAMSON; MICHAEL WINTER; BARBARA WISEMAN; PHYLLIS WOODFORD; JOYCE WOODLE; BEVERLY WOOLLETT; PAUL WOOLLETT;

MELVINA STOKES WRIGHT; PATRICIA WRIGHT; GLENN WYCHE; JOHN WYCHE; JOHN F. YOUNG; JOHN W. YOUNG; JUDITH CAROL YOUNG; SANDRA RHODES YOUNG; JOANNE ZIMMERMAN; STEPHEN THOMAS ZONE; PATRICIA THORSTAD ZOSO; JAMAAL MUATA ALI; MARGARET ANGELONI; JESUS AROYO; MILAGROS ARROYO; OLYMPIA CARLETTA; KIMBERLY CARPENTER; JOAN COMES; PATRICK COMES; CHRISTOPHER COMES; FRANK COMES SR.; DEBORAH CRAWFORD; BARBARA DAVIS; ALICE WARREN FRANKLIN; PATRICIA GERLACH; TRAVIS GERLACH; MEGAN GERLACH; ARMINDA HERNANDEZ; MARGARET HLYWIAK; PETER HLYWIAK JR.; PETER HLYWIAK SR.; PAUL HLYWIAK; JOSEPH HLYWIAK; CYNTHIA LOU HUNT; ROSA IBARRO; ANDREW SCOTT JACOBS; DANIEL JOSEPH JACOBS; DANITA JACOBS; KATHLEEN KIRKPATRICK; GRACE LEWIS; LISA MAGNOTTI; WENDY MITCHELL; ESTATE OF JAMES OTIS MOORE; ESTATE OF JOHNNEY S. MOORE; MARVIN S. MOORE; ALIE MAE MOORE; JONNIE MAE MOORE-JONES; ESTATE OF ALEX W. NASHTON; PAUL OLIVER; RILEY OLIVER; MICHAEL JOHN OLIVER; ASHLEY E. OLIVER; PATRICK S. OLIVER; KAYLEY OLIVER; TANYA RUSSELL; WANDA RUSSELL; JASON RUSSELL; CLYDIA SHAVER; SCOTT SPAULDING; CECILIA STANLEY; MARY STILPEN; KELLY SWANK; ESTATE OF KENNETH J. SWINSON; ESTATE OF INGRID M. SWINSON; DANIEL SWINSON; WILLIAM SWINSON; DAWN SWINSON; TERESA SWINSON; BRONZELL WARREN; JESSICA

WATSON; AUDREY WEBB; JONATHAN WHEELER; BENJAMIN WHEELER; ESTATE OF MARLIS (“MOLLY”) WHEELER; KERRY WHEELER; ANDREW WHEELER; BRENDA JUNE WHEELER; JILL WOLD; ESTATE OF NORA YOUNG; JAMES YOUNG; ESTATE OF ROBERT YOUNG; EMMA JEAN ANDERSON; ESTATE OF DENNIS ANDERSON, SR.; MELVIN OLEY THOMPSON; ALAN C. ANDERSON; THELMA ANDERSON; ESTATE OF STEPHEN B. BLAND; ESTATE OF FRANK BLAND; JAMES BLAND; RUTH ANN BLAND; ESTATE OF LAURA V. COPELAND; RONALD DUPLANTY; ESTATE OF SEAN F. ESTLER; KEITH ESTLER; MARY ELLEN ESTLER; LOUIS C. ESTLER, JR.; ESTATE OF BENJAMIN E. FULLER; ELAINE ALLEN; ERNEST C. FULLER; JOHN GIBSON; HOLLY GIBSON; MAURICE GIBSON; ESTATE OF MICHAEL HASTINGS; JOYCE HASTINGS; ESTATE OF PAUL HEIN; CHRISTOPHER HEIN; JO ANN HEIN; KAREN HEIN; VICTOR HEIN; JACQUELINE M. KUNCYZ; ESTATE OF JOHN HENDRICKSON; JOHN HENDRICKSON; TYSON HENDRICKSON; DEBORAH RYAN; ESTATE OF BRUCE HOLLINGSHEAD; MELINDA HOLLINGSHEAD; RENARD MANLEY; ESTATE OF MICHAEL R. MASSMAN; ANGELA MASSMAN; KRISTOPHER MASSMAN; LYDIA MASSMAN; NICOLE GOMEZ; PATRICIA LOU SMITH; ESTATE OF LOUIS MELENDEZ; DOUGLAS J. MELENDEZ; JOHNNY MELENDEZ; ZAIDA MELENDEZ; JOHNNY MELENDEZ, JR.; ESTATE OF MICHAEL D. MERCER; SARAH MERCER; SAMUEL PALMER; ROBIN NICELY; ESTATE OF JUAN RODRIGUEZ;

LOUISA PUNTONET; ROBERT RUCKER;  
ESTATE OF BILLY SAN PEDRO; CESAR  
SAN PEDRO; GUILLERMO SAN PEDRO;  
JAVIER SAN PEDRO; SILA SAN PEDRO;  
THURNELL SHIELDS; EMMANUEL  
SIMMONS; ESTATE OF JAMES SURCH;  
WILL SURCH; PATTY BARNETT;  
BRADLEY ULICH; JEANETTE  
DOUGHERTY; MARILYN PETERSON;  
ESTATE OF ERIC WALKER; TENA  
WALKER-JONES; RONALD E. WALKER;  
RONNIE WALKER; GALEN WEBER;  
ESTATE OF OBRIAN WEEKES; IANTHE  
WEEKES; KEITH WEEKES; META  
WEEKES; ANSON EDMOND; ARNOLD  
EDMOND; HAZEL EDMOND; WENDY  
EDMOND; ESTATE OF DENNIS L. WEST;  
KATHY WEST; ESTATE OF JOHN WEYL;  
SHARON ROWAN; KELLY BACHLOR;  
ROBIN BROCK; MORGAN W. ROWAN;  
NELSON WEYL; ARMANDO J. YBARRA;  
JOHN E. L'HEUREUX; ESTATE OF  
TERRANCE RICH; ELIZABETH MURPHY;  
BRYAN HARRIS; MARY E. WELLS; KERRY  
M. L'HEUREUX; JANE L. L'HEUREUX;  
AMY BATTLE TAYLOR; ESTATE OF  
CORINNE COLLINS; BETH HOLLOWAY;  
JUANITA R. GOLDFARB; MARY  
HERNANDEZ; JAMES HERNANDEZ;  
MARCUS A. HERNANDEZ; MATILDE  
HERNANDEZ III; VERONICA  
HERNANDEZ; DELFINA ARRIOLA;  
HORTENCIA ORTUNIO; MARGARET  
SANTIAGO; RODOLFO-RUDY  
HERNANDEZ; RICHARD HERNANDEZ;  
JOSIE CORTEZ; ESTATE OF LEONARDO  
HERNANDEZ; ROBERT MUFFLER, JR.;  
RONALD TISHMACK; LESLIE TISHMACK;  
ESTATE OF TERESA TISHMACK; CELIA  
WALKER; ANNISE CRAWFORD;

ELIZABETH JAMES; DOROTHY C. WINT;  
KENNETH C. WINT; LINDA VALANIA;  
ROBERT WINT; SHEILA FEATHERSTONE;  
ESTATE OF WALTER EMERSON WINT, SR.;  
JUTTA YARBER; DAVID YARBER;  
DEBORAH YARBER; ROBERT YARBER;  
HAZEL RENTON; ALENE MASTERSON;  
CLIFFORD YARBER; CATHERINE  
ARNOLD; CATHY WENDY ARNOLD;  
MARK ARNOLD; MOSES ARNOLD, SR.;  
MOSES BERNARD ARNOLD; ROSALIND  
ARNOLD; SANDY CHRISTINE ACKLEY;  
TIMOTHY DION ARNOLD; PEDRO  
ALVARADO, JR.; DENNIS JACK  
ANDERSON; TIMOTHY BROOKS;  
MICHAEL HARRIS; DONALD R.  
PONTILLO; JOHN E. SELBE; WILLY G.  
THOMPSON; TERANCE J. VALORE; NEALE  
SCOTT BOLEN; PEDRO ALVARADO, JR.;  
TERANCE J. VALORE; ESTATE OF DAVID  
L. BATTLE; ESTATE OF MATILDE  
HERNANDEZ, JR.; ESTATE OF JOHN  
MUFFLER; ESTATE OF JOHN JAY  
TISHMACK; ESTATE OF LEONARD  
WARREN WALKER; ESTATE OF WALTER  
EMERSON WINT, JR.; ESTATE OF JAMES  
YARBER; ESTATE OF MOSES ARNOLD, JR.  
ESTATE OF JAMES SILVIA; ANGEL  
ALVARADO; GERALDO ALVARADO;  
GRISSELLE ALVARADO; LUIS ALVARADO;  
LUISA ALVARADO; MARIA ALVARADO;  
MARTA ALVARADO; MINERVA  
ALVARADO; YOLANDA ALVARADO;  
ZORAIDA ALVARADO; ANDRES  
ALVARADO TULL; CHERYL BASS;  
EDWARD J. BROOKS; PATRICIA A.  
BROOKS; WANDA FORD; BENNIE HARRIS;  
ROSE HARRIS; MARCY LYNN PARSON;  
DOUGLAS PONTILLO; DON SELBE;  
ELOISE F. SELBE; JAMES SELBE;

BELINDA SKARKA; ALLISON THOMPSON;  
ISALINE THOMPSON; JOHNNY  
THOMPSON; DEBORAH TRUE; JANICE  
VALORE; ORLANDO M. VALORE, JR.;  
ORLANDO MICHAEL VALORE, SR.;  
LOLITA M. ARNOLD; LISA ANN BECK;  
BETTY J. BOLEN; KEITH EDWIN BOLEN;  
SHELDON H. BOLEN; SHARLA M. KORZ;  
LYNNE MICHOL SPENCER; CATHERINE  
BONK; KEVIN BONK; THOMAS BONK;  
JOHN BONK, SR.; MARION DIGIOVANNI;  
SHERRY LYNN FIEDLER; MARILOU  
FLUEGEL; ROBERT FLUEGEL; THOMAS A.  
FLUEGEL; EVANS HAIRSTON; FELICIA  
HAIRSTON; JULIA BELL HAIRSTON;  
HENRY DURBAN HUKILL; MARK  
ANDREW HUKILL; MATTHEW SCOTT  
HUKILL; MELISSA HUKILL; MEREDITH  
ANN HUKILL; MITCHELL CHARLES  
HUKILL; MONTE HUKILL; VIRGINIA  
ELLEN HUKILL; CATHERINE BONK HUNT  
STORM JONES; PENNI JOYCE; JEFF  
KIRKWOOD; SHIRLEY KIRKWOOD; CARL  
ARNOLD KIRKWOOD, JR.; CARL  
KIRKWOOD, SR.; PATRICIA  
KRONENBITTER; BILL LAISE; BETTY  
LAISE; KRIS LAISE; BILL MACROGLOU;  
JAMES MACROGLOU; LORRAINE  
MACROGLOU; KATHY MCDONALD;  
EDWARD JOSEPH MCDONOUGH;  
EDWARD W. MCDONOUGH; SEAN  
MCDONOUGH; DEBORAH SPENCER  
RHOSTO; ESTATE OF LUIS ROTONDO;  
ESTATE OF ROSE ROTONDO; ESTATE OF  
PHYLLIS SANTOSERRE; ANNA MARIE  
SIMPSON; RENEE EILEEN SIMPSON;  
ROBERT SIMPSON; LARRY H. SIMPSON,  
SR.; SALLY JO WIRICK; FAITH ALBRIGHT;  
GARY WAYNE ALLISON; C. KEITH  
BAILEY; CHARLES E. BAILEY; VINA S.

BAILEY; KAREN L. COOPER; MARK  
BARTHOLOMEW; TERESA  
BARTHOLOMEW; CRYSTAL  
BARTHOLOMEW; JERRY  
BARTHOLOMEW; JOYCE  
BARTHOLOMEW; ARTHUR JOHNSON;  
ROBERT BRAGG; THOMAS D. BROWN,  
JR.; JEANETTE ODOM; DEBORAH VOGT;  
CHRISTOPHER BURNETTE; CONNIE  
DECKER; GWEN BURNETTE; GWEN  
WOODCOCK; LISA BURLEYSON; MECOT  
ECHO CAMARA; DALE COMES; TOMMY  
COMES; ESTATE OF BERT DANIEL  
CORCORAN; KATHLEEN COLLINS;  
CATHERINE CORCORAN; ESTATE OF  
ROBERT ALTON CORCORAN; ESTATE OF  
KEITH ALTON CORCORAN; ROBERT  
BRIAN CORCORAN; ELIZABETH ANN  
ORTIZ; MICHAEL CORRIGAN; ESTATE OF  
ANDREW DAVIS; CAROLYN DAVIS;  
JENNIFER DAVIS; ESTATE OF FREDERICK  
DOUGLASS; SHIRLEY DOUGLASS  
MILLER; SUSAN BAKER; REGINA  
PERIERA; RICHARD DUDLEY; TOLEDO  
DUDLEY; SHERRY LATOZ; CYNTHIA  
BLANKENSHIP; GINGER TUTON; SCOTT  
DUDLEY; DAVID EAVES; ESTATE OF ROY  
EDWARDS; CINDY COLASANTI; ESTATE  
OF BARBARA EDWARDS; ESTATE OF  
PENNY GARNER; ESTATE OF DAVID D.  
GAY; GAIL BLACK; ESTATE OF NEVA  
JEAN GAY; RONALD GAY; TIMOTHY GAY;  
REBECCA CORDELL; STATE OF DAVID D.  
GAY, SR.; ESTATE OF WARNER GIBBS, JR.;  
FREDA GIBBS HUTCHERSON; LARRY  
GIBBS; MARCUS A. LEWIS; ESTATE OF  
WARNER GIBBS, SR.; ESTATE OF JANET  
YVONNE LEWIS; EARL GUY; JOAN M.  
CRAWFORD; IAN GUY; EDDIE GUY, JR.;  
ADAM GUY; ESTATE OF DOUGLAS HELD;

ESTATE OF SONDRA LOU HELD; PATRICK HELD; THOMAS HELD; THOMAS HOKE; GLENN W. HOLLIS; JANE COSTA; ESTATE OF ANN HOLLIS; JACK DARRELL HUNT; MENDY LEIGHT HUNT; MOLLY FAY HUNT; ESTATE OF JOHN INGALLS; JAMES INGALLS; JOSEPH INGALLS; KEVIN JIGGETTS; DONALD LONG; ROBERT LYNCH; ESTATE OF MANUAL MASSA, SR.; TIM MCCOSKEY; RONALD L. MOORE; JOHN W. NASH; ROSE ANN NASH; ESTATE OF FRANK E. NASH; WILLIAM H. NASH; MARK S. NASH; FRANK E. NASH, JR.; JAKLYN MILLIKEN; ROSEMARIE VLIET; CATALDO ANTHONY NASHTON; CLAUDIA COMINO; MARK NASHTON; MYLES NASHTON; JENNIFER PAGE NELSON; TIMOTHY PRICE; ESTATE OF BETTY LOU PRICE; JAMES M. PUCKETT; RONALD PUTNAM; BRUCE H. RICHARDSON; BERNICE RIVERS; BARBARA ANN RUSSELL; ROBERT EMMETT RUSSELL; GLENN EDWARD RUSSELL; CHARLES EDWARD RUSSELL, JR.; JEAN LOUIS BROWN; NANCY MACDONALD; DIANE CAROL HIGGINS; ESTATE OF THOMAS RUSSELL; THOMAS RUTTER; JOHN SANTOS; RAOUL SANTOS; MARY SANTOS; DONNA DUFFY; MARY CROPPER; DOREEN CALLANAN; JEAN WINNER; KEVIN SANTOS; RAOUL SANTOS; JOSEPH RICHARD SCHNEIDER; MORRIS SCHNEIDER; JACQUELINE GIBSON; PAUL SEGARRA; STEVEN SHAPURAS; DAVID W. SHARP; CHARLES SIMMONS; ESTATE OF THOMAS D. STOWE; DAVID STOWE; BARBARA STOWE; PRISCILLA STOWE; SAMANTHA STOWE; DONNA BALOGA; EDWARD J. STREKER; ESTATE OF HENRY

TOWNSEND, JR.; LILLIAN TOWNSEND;  
HENRY TOWNSEND; MARCIA C.  
TOWNSEND-TIPPETT; VALERIE TATUM;  
CYNTHIA GREEN; KAWANNA DUNCAN;  
JOHN TURNER; JUDITH TURNER;  
THOMAS ANDREW WALSH; CHARLES  
WALSH; RUTH WALSH; PAT CAMPBELL;  
RACHEL WALSH; TIMOTHY WALSH;  
MICHAEL WALSH; ESTATE OF SEAN  
WALSH; PATRICIA FITZGERALD  
WASHINGTON; GERALD FOISTER;  
ESTATE OF TANDY W. WELLS; DANNY  
HOLLAND WELLS; EDITH HOLLAND  
WELLS; ESTATE OF HAROLD DEAN  
WELLS; FRANCES MANGRUM; STELLA  
WELLS GEORGE; CLETA WELLS;  
TIMOTHY SHON WELLS; MICHAEL  
SHANE WELLS; PERRY GLENN WELLS;  
BRYAN K. WESTRICK; JOHN WESTRICK;  
PATRICIA WESTRICK; WHITNEY R.  
WESTRICK; GERALD WILKES, JR.;  
GERALD WILKES, SR.; ESTATE OF PEGGY  
WILKES; ESTATE OF DOROTHY  
WILLIAMS; BILL WILLIAMSON;  
DEBORAH WISE; MICHAEL ZILKA; SUE  
ZILKA; JOSEPH A. BARILE; ANGELA E.  
BARILE; MICHAEL BARILE; ANDREA  
CIARLA; ANN MARIE MOORE; ANGELA  
YOAK; JOHN BECKER; ESTATE OF  
ANTHONY K. BROWN; JOHN BROWN;  
ROWEL BROWN; SULBA BROWN; VARA  
BROWN; MARVINE MCBRIDE; LAJUANA  
SMITH; RODNEY E. BURNS; EUGENE  
BURNS; DAVID BURNS; JEANNIE  
SCAGGS; DANIEL CUDDEBACK, JR.;  
BARBARA CUDDEBACK; DANIEL  
CUDDEBACK, SR.; MICHAEL EPISCOPO;  
RANDY GADDO; LOUISE GADDO  
BLATTLER; PETER GADDO; TIMOTHY  
GADDO; ESTATE OF WILLIAM R. GAINES

JR.; MICHAEL A. GAINES; WILLIAM R. GAINES SR.; CAROLYN SPEARS; CAROLE WEAVER; ESTATE OF VIRGEL HAMILTON; GLORIA HAMILTON; BRUCE S. HASTINGS; MAYNARD HODGES; MARY JEAN HODGES; KATHY HODGES; LORETTA BROWN; CINDY HOLMES; SHANA SAUL; DANIEL JOY; DANIEL KREMER; ESTATE OF THOMAS KREMER; ESTATE OF CHRISTINE KREMER; JOSEPH T. KREMER; JACQUELINE STAHR; ESTATE OF DAVID A. LEWIS; BETTY LEWIS; JERRY L. LEWIS; SCOTT M. LEWIS; PAUL MARTINEZ SR.; TERESA GUNTHER; ALPHONSO MARTINEZ; DANIEL L. MARTINEZ; MICHAEL MARTINEZ; PAUL MARTINEZ JR.; TOMASITA L. MARTINEZ; ESTHER MARTINEZ-PARKS; SUSANNE YEOMAN; ESTATE OF JEFFREY B. OWEN; JEAN G. OWEN; STEVEN OWEN; ESTATE OF MICHAEL L. PAGE; ALBERT PAGE; JANET PAGE; JOYCE CLIFFORD; DAVID PENOSKY; JOSEPH PENOSKY; CHRISTIAN R. RAUCH; LEONARD PAUL TICE; ESTATE OF BURTON WHERLAND; GREGORY WHERLAND; KIMMY WHERLAND; SARAH WHERLAND; SHARON DAVIS; CHARLES F. WEST; CHARLES H. WEST; RICK WEST; EVAN FAIN III; MARIA FAIN; MARIA AMOSA; EVAN FAIN IV; JOSEPH EDWARD FAIN; KENNETH SPENCER JR.; SAMUEL P. RICE; STEVEN JOSEPH DIAZ; ESTATE OF DAVID BROWN; ESTATE OF JESSE JAMES ELLISON; ROBERT SWORD; STEVEN SIBILLE; DONALD HOWELL; FRANCES SPENCER; ESTATE OF KENNETH SPENCER, SR.; AMY MORROW; KAREN BROWN; KRIS BOERGER; SAMUEL O. RICE; BELINDA RICE; AMY

COGSWELL; DAVID RICE; TODD RICE;  
VALERIE TRAIL; DANIEL RICE; LISA  
SCHULTZ; STEVEN JAMES DIAZ; JANE  
ASTRID DIAZ; ROBERT DIAZ; TERESA  
DIAZ; MAGDALENA MARY DIAZ; RAUL  
DIAZ; EDWARD DIAZ; ESTATE OF DANIEL  
P. DIAZ; CARMELLA WOOD; PATSY  
MCENTIRE; LEWIS BROWN; LISA  
MAYBIN; RONNY BROWN; CYNTHIA  
BURT; ESTATE OF THERISA EDWARDS;  
ESTATE OF ANDRES ALVARADO MIRBAL;  
ESTATE OF NERIDA TULL BAEZ; ESTATE  
OF MARGARET O'BRIEN; MITCHELL  
ANDERSON; ESTATE OF VIRGINIA  
ELLISON; ESTATE OF KENNETH ELLISON;  
KIMBERLY CARLSON; GARY CARLSON;  
DANIEL CARLSON; WILLIAM CARLSON;  
PENNY NELSON; BEULAH SWORD;  
WILLIAM SWORD; JOHN SWORD; JERRY  
SWORD; CAROLINE BROADWINE;  
ESTATE OF VERIAN SIBILLE; ESTATE OF  
VICTOR SIBILLE JR.; VICTOR SIBILLE IV;  
KEVIN SIBILLE; VALERIE UNKEL;  
PAMELA SCHULTZ; STEPHANIE HARDY;  
MARY JANE HOWELL; RONALD HOWELL;  
DONNA BLACK; MARIO H. VASQUEZ;  
DENNY WEST; ESTATE OF JOHN  
CHIPURA; EILEEN CHIPURA; NANCY  
CHIPURA; GERARD CHIPURA; SUSAN  
COHEN; ESTATE OF ROSCOE HAMILTON;  
FREDA SUE GAYHEART; RAMONA  
GREEN; ROBERT HAMILTON; JAMES  
EDWARDS; RAY EDWARDS; BETTY SUE  
ROWE; GARY EDWARDS; RALPH  
EDWARDS; ESTATE OF LARRY EDWARDS;  
ESTATE OF DAVID WORLEY; NANCY  
WORLEY; DAVID WORLEY; RYAN  
WORLEY; ESTATE OF JOHN  
BUCKMASTER; ESTHER BUCKMASTER;  
GREGG BUCKMASTER; VICKIE

BUCKMASTER; ARLEY BUCKMASTER;  
ESTATE OF MALKA ROTH; FRIMET ROTH;  
PESIA ROTH; RIVKA ROTH RAPPAPORT;  
ZVI ROTH; SHAYA ROTH; PINCHAS ROTH;  
STEVEN BOVA; ESTATE OF NICHOLAS  
BAKER; RICHIE BAKER; CORA FRYE;  
GARY BERGMAN; ESTATE OF WILLIAM  
BERGMAN; ESTATE OF MARY BERGMAN;  
JAMES E. BROWN; JACK EARN BROWN;  
ALBERT R. BURTON; MARGARET  
BURTON; ESTATE OF GARLAND BURTON;  
KATHERINE BURTON; ESTATE OF JIMMY  
CAIN; KATHERINE CAIN; DORIS  
MCDOWELL; ESTATE OF HUGH J. CAIN  
JR.; JOHN CAIN; CANDACE PALMER;  
ESTATE OF MARC L. COLE; JODIE COLE;  
ESTATE OF SANDRA COLE; JOSEPH  
CORTNER II; ALICE BUNTE; ESTATE OF  
SAUNDRA HILLMAN; PAUL J. DWYER;  
HELEN DWYER; DANIEL DWYER;  
KATHLEEN ROBINSON; ESTATE OF  
WILLIAM D. ELLIOT JR.; ANTHONY  
ELLIOT; ESTATE OF WILLIAM D. ELLIOT  
SR.; ESTATE OF MARGARET S. ELLIOT;  
MATTHEW C. ELLIOT MILLER;  
JONATHAN PAUL MILLER; WILLIAM  
DANIEL ELLIOT III; SUZANNE ELLIOT;  
JOAN ELLIOT WARFEL; MAUREEN  
HENRY; MARY BETH SEIBER; MARGARET  
BEAVER; ESTATE OF JAMES ELLIS  
FAULK; KATHLEEN FAULK; SHAWN  
MICHAEL FAULK; CHARLES FRYE;  
DONNA HELD; GORDON HICKMAN;  
ANTONIO HICKMAN; JAMES K. HINES;  
ELOISE HINES; MALCOLM HOWELL;  
SCOTT INNOCENZI; ESTATE OF PAUL  
INNOCENZI JR.; GARY K. JONES; KELLY  
GORMAN; DAMON JONES; TINA JAMES;  
ESTATE OF EDWARD E. KIMM; ANNA  
MARIE KIMM; JUNE B. GRIGGS KIMM;

JOHN L. KINSLOW; ANNA PATRICIA  
MALEC; JACK R. MACDONALD III;  
MICHELL MANLEY; ESTATE OF ALICE  
MANLEY; ESTATE OF OCIE SHELL;  
ESTATE OF JOSEPH MATTACHIONE;  
ANTHONY MATTACCHIONE; JANET  
MARGARET ROUSSEAU CHILDRESS;  
ANNE MARIE MATTACCHIONE CHESSER;  
NICHOLAS MATTACCHIONE; VINCENT  
MATTACCHIONE; ESTATE OF TIMOTHY  
MCNEELY; ESTATE OF DAVID S.  
MCNEELY JR.; ESTATE OF DOROTHY E.  
MCNEELY; VICKI C. MCNEELY BRAWLEY;  
JOE GOODNIGHT JR.; HARRY A. MINCER;  
ELLEN CRON; FAY CRON; HOWARD R.  
NASH; ALAN OPRA; DRUCILLA PALMER  
SCHREWSBURY; ADRIAN SAMUEL  
MACKOWSKI RIEGA; ARIADNA FALCO;  
PHILLIP RITTER; CRAIG RITTER; KEVIN  
RITTER; GREGORY ROSENBERG;  
MEREDYTH ROSENBERG; CASSIE  
LEMIRE SANTOS; KAREN SCHNEIDER  
THEONNES; ESTATE OF CREIGHTON  
SCHNEIDER; LISBETH SUSAN MULLEN;  
DANIEL TURNER; GARRY D. VASSER;  
JOSEPH L. VINCENT; EDNA VINCENT-  
CASON; MARK WOLCOTT; MARY C.  
WOLCOTT; JOSEPH E. WOLCOTT SR.;  
ESTATE OF MATTHEW DAVID WOLCOTT;  
BRIAN JAY WOLCOTT; JOSEPH E.  
WOLCOTT JR.; BECKY WOLCOTT;  
WENDY GOWAN; MARK A. COOK; LINDA  
RESINGER; TRACY L. COOK; CHERYL  
FELLOWS; KEVIN COOK; BETTY  
SIMMONS; ESTATE OF WILLIAM  
SIMMONS; ALLEN BROWN; ESTATE OF  
EMMA V. GOWEN; ESTATE OF CARROLL  
BROWN; LINDA EITEL; MARGARET  
SEVERIO; JESSIE BROWN; LEONARD  
HAMILTON; ROSA DOBBS; GILBERT

HORNE; NANNIE BROOKS; PATRICIA  
HORNE; MICHAEL HORNE; TRACY  
HORNE; CHARLES HORNE; EDGAR  
HORNE JR.; SABRINA HORNE; SHIRLEY  
HORNE; LESLIE KAMECK; LINDA  
KAMECK; JEREMY KAMECK; WILLIE  
RIDDLE; MELINDA RIDDLE; STEVEN  
RIDDLE; BRIAN RIDDLE; JOHN  
WELLMAN; DEBORAH MEURER; ESTATE  
OF JUAN MIGUEL COMAS; JUAN  
ANTONIO COMAS; RODNEY RHODAN;  
ESTATE OF VALERIE RHODAN; ESTATE  
OF CLARENCE RHODAN; KEVIN  
RHODAN; VERNON RHODAN; JONATHAN  
RHODAN; TOMMY LASTER; CAROLYN  
MUMPHERY; NATHANIEL LASTER;  
ELOISE LASTER; OTIS LASTER; ESTATE  
OF CARL LASTER; WOODROW LASTER;  
JOHN LASTER; PHILIP AMRHEIN; TRUDY  
BACINO; ESTATE OF JANE CHIPURA;  
ESTATE OF ANTHONY CHIPURA; JEFF  
DADICH; JEAN DADICH; ROBERT  
DADICH; DANIELLE KROH; TRACEY  
PERKINS; CHARLES A. WEST; JEREMIAH  
WEST; ESTATE OF JOHN WORLEY; MARIO  
I. VASQUEZ; SARA VASQUEZ; ESTATE OF  
RICHARD A. MORROW; KAREN  
CONTRILLO; PATRICIA ULAKOVICH;  
DEBORAH LOCKNER; COLLEEN  
ODENTHAL; MARCY HUNT DUFF;  
RICHARD DAVID GRUBBS; MARK  
VAUGHN; BRET GRUBBS; MICHAEL  
ZAWACKI; VERONICA ZAWACKI; TRACI  
ZAWACKI MACCAULEY; STANLEY  
ZAWACKI JR.; TERESA ZAWACKI  
CHAPMAN; ANTHONY FRANKS; FANNIE  
LOUISE FRANKS; MARILYN FRAZIER;  
ESTATE OF SHARON THORNE; TINA  
CADLE; RICHARD FRANK; RODNEY  
CLIFF; RHONDA LITTLE; ESTATE OF

EUGENE CLIFF; RANDY CLIFF; RICKY CLIFF; RANAEE CROZIER; ROXANNE CLIFF; DAVID LAWSON; SHIRLEY LENARTOWICZ; PHYLLIS MOZITIS; JOAN MUFFLER; MARK WILLIAMS; DORIS ALLINGER; DONNA WILLIAMS; RICHARD EVERHART; MARIE EVERHART; CHRISTINE CHINARIS; CYNTHIA BACON; WILLIAM HARRISON; EMILIE HARRISON; ESTATE OF JACOB FRITZ; ESTATE OF LYLE FRITZ; ETHAN FRITZ; DANIEL FRITZ; ESTATE OF BRYAN CHISM; ELIZABETH CHISM; DANNY CHISM; VANESSA CHISM; JULIE CHISM; ESTATE OF SHAWN FALTER; LINDA FALTER; MARJORIE FALTER; RUSSELL J. FALTER; RUSSELL C. FALTER; ANDREW LUCAS; DAVID LUCAS; TIMOTHY LUCAS; MARSHA NOVAK; JASON SACKETT; JOHN SACKETT; ESTATE OF AHMED AL-TAIE; HATHAL K. TAIE; KOUSAY AL-TAIE; NAWAL AL-TAIE; BASHAR AL-TAIE; LUCY CHEGE; MARGARET GITAU; SUSAN GITAU; PERIS GITUMBU; STACY WATHHERE; MONICAH KAMAU; JOAN KAMAU; MARGARET NZOMO; BARBARA MULI; STEPHEN MULI; LYDIA NDIVO MAKAU; FRANCIS MBOGO NJUNG'E; SARAH MBOGO; MISHECK MBOGO; ISAAC KARIUKI MBOGO; REUBEN NYAGA MBOGO; NANCY MBOGO; EPHANTUS NJAGI MBOGO; STEPHEN NJUKI MBOGO; ANN MBOGO; NEPHAT KIMATHI MBOGO; DANIEL OWITI OLOO; MAGDALINE OWITI; BENSON BWAKU; BEATRICE BWAKU; JOTHAM GODIA; GRACE GODIA; HANNAH NGENDA KAMAU; DUNCAN NYOIKE KAMAU; CHRISTINE MIKALI KAMAU; RUTH NDUTA KAMAU; MERCY WANJIRU;

STANLEY NYOIKE; JENNIFER NJERI;  
ANTHONY NJOROGE; SIMON NGUGI;  
MICHAEL IKONYE KIARIE; JANE IKONYE  
KIARIE; SAMMY NDUNGU KIARIE;  
ELIZABETH KIATO; CHARITY KIATO;  
JUDY KIARIE; NANCY MIMBA MAGAK;  
RAPHAEL PETER MUNGUTI; MARY  
MUNGUTI; ANGELA MWONGELI MUTISO;  
BENSON NDEGWA; PHOEBA NDEGWA;  
MARGARET MWANGI NDIBUI; CAROLINE  
NGUGI KAMAU; CHARLES OLEWE;  
PHELISTER OKECH; PHAEDRA  
VRONTAMITIS; LEONIDAS  
VRONTAMITIS; ALEXANDER  
VRONTAMITIS; PAUL VRONTAMITIS;  
ANASTASIA GIANPOULOS; JOHN OFISI;  
KATHERINE MWAKA; EUCABETH  
GWARO; TRUSHA PATEL; PANKAJ PATEL;  
MARY MUDECHE; MICHAEL WARE;  
SAMMY MWANGI; LUCY MWANGI;  
JOSEPH WAHOME; SOLOMON MBUGUA;  
JAPETH GODIA; MERAB GODIA;  
WINFRED MAINA; JOMO MATIKO BOKE;  
SELINA BOKE; HUMPHREY KIBURU;  
JENNIFER WAMBUI; HARRISON KIMANI;  
GRACE KIMANI; ELIZABETH MULI -  
KIBUE; HUDSON CHORE; LYDIA  
NYABOKA OTAO OKINDO; STANLEY  
KINYUA MACHARIA; NANCY  
MACHARIA; BETTY ORIARO; RACHEL  
OYANDA OTIENO; HILARIO AMBROSE  
FERNANDES; CATHERINE MWANGI;  
DOREEN OPORT; PHILEMON OPORT;  
GERALD BOCHART; YVONNE BOCHART;  
LEILANI BOWER; MURABA CHAKA;  
ROSELYNE NDEDAA; AMES MUKABI;  
EDWIN OMORI; FLORENCE OMORI;  
BRYAN OMORI; JERRY OMORI;  
JANATHAN OKECH; FRANCIS NDUNGU  
MBUGUA; MARY MUTHONI NDUNGU;

SAMUEL MBUGUA NDUNGU; JAMLECK GITAU NDUNGU; JOHN MUIRU NDUNGU; EDITH NJERI; ANNASTACIAH LUCY BOULDEN; AGNES WANJIKU NDUNGU; FAITH MALOBA; DERRICK MALOBA; STEVEN MALOBA; BELINDA MALOBA; CHARLES OCHOLA; RAELE OCHOLA; WYCLIFFE OCHIENG BONYO; VELMA BONYO; DORINE BONYO; ELIJAH BONYO OCHIENG; ANGELA BONYO; WINNIE BONYO; BONIFACE CHEGE; CAROLINE WANJIRU GICHURU; LAWRENCE AMBROSE GITAU; LUCY GITAU; CATHERINE GITAU; FELISTER GITAU; ERNEST GITAU; JOEL GITUMBU KAMAU; CATHERINE GITUMBU KAMAU; DAVID KAMAU; PETER KAMAU; PHILLIP KAMAU; HENRY BATHAZAR KESSY; FREDERICK KIBODYA; FLAVIA KIYANGA; JOSEPH KAMAU KIONGO; LUCY KIONGO; ALICE KIONGO; JANE KAMAU; NEWTON KAMAU; PETER KAMAU KIONGO; TERESIA WAIRIMU KAMAU; PAULINE KAMAU; HANNAH WAMBUI; PAULINE KAMAU KIONGO; MERCY WAIRUMU KAMAU; DANIEL KIONGO KAMAU; RAPHAEL KIVINDYO; MILKA WANGARI MACHARIA; RACHAEL MUNGASIA PUSSY; SAMUEL PUSSY; DOREEN PUSSY; ELSIE PUSSY; ANDREW PUSSY; MICHAEL NGIGI MWORIA; JOHN NDUATI; AARON MAKAU NDIVO; JOYCE MUTHEU; MAURICE OKATCH OGOLLA; PRISCILA OKATCH; JACKLINE ACHIENG; ROSEMARY ANYANGO OKATCH; SAMSON OGOLLA OKATCH; DENNIS OKATCH; PAULINE ABDALLAH; BELINDA AKINYI ADIKA; TONY KIHATO IRUNGU; FAITH KIHATO; JACQUELINE KIHATO; STEVE KIHATO; ANNAH WANGECHI;

ELSIE KAGIMBI; VINCENT KAMAU  
NYOIKE; JOSINDA KATUMBA KAMAU;  
CAROLINE WANJURI KAMAU; FAITH  
WANZA KAMAU; DAVID KIARIE KIBURU;  
FRANCIS WATORO MAINA; GRACE  
KIMATA; VICTOR WATORO; RACHEL  
WAMBUI WATORO; LYDIA MURIKI  
MAYAKA; NYANGORO MAYAKA;  
DOREEN MAYAKA; DICK OBWORO  
MAYAKA; DIANA NYANGARA; DEBRA  
MAYAKA; GEORGE MAGAK MIMBA;  
TIBRUSS MINJA; EDWARD MWAE  
MUTHAMA; NICHOLAS MUTISO;  
GEOFFREY MOSES NAMAI; SARAH  
TIKOLO; NIGEEL NAMAI; CHARLES  
MWANGI NDIBUI; JULIUS NZIVO;  
FRANCIS OLEWE OCHILO; ROSEMARY  
OLEWE; JULIET OLEWE; WENDY OLEWE;  
PATRICK OKECH; LUCY GRACE ONONO;  
MORDECHAI THOMAS ONONO; ADAM  
TITUS WAMAI; WINFRED WAMAI; TITUS  
WAMAI; DIANA WILLIAMS; LLOYD  
WAMAI; ANGELA WAMAI; JOHN  
MURIUKI; EVITTA FRANCIS KWIMBERE;  
MARY OFISI; ERIC ABUR ONYANGO;  
JOYCE ONYANGO; TILDA ABUR;  
BARNABAS ONYANGO; KELESENDHIA  
APONDI ONYANGO; PAUL ONYANGO;  
KAKA ABUBAKAR IDDI; CHARLES  
MWAKA MULWA; VICTOR MPOTO;  
JULIUS OGORO; KIMEU NZIOKA  
NGANGA; MARY NDAMBUKI;  
WELLINGTON OLUOMA; JACINTA  
WAHOME; STELLA MBUGUA; SAJJAD  
GULAMAJI; MARY GITONGA; FRANCIS  
MAINA NDIBUI; KIRUMBA W'MBURU  
MUKURIA; CHRISTANT HIZA; MARINI  
KARIMA; ZEPHANIA MBOGE; EMILY  
MINAYO; JOASH OKINDO; RUKIA  
WANJIRU ALI; BERNARD MUTUNGA

KASWII; HOSIANA MBAGA; MARGARET  
WAITHIRA NDUNGU; SAMUEL  
ODHIAMBO ORIARO; GAUDENS THOMAS  
KUNAMBI; LIVINGSTONE BUSERA  
MADAHANA; MENELIK KWAMIA  
MAKONNEN; TOBIAS OYANDA OTIENO;  
CHARLES MWIRIGI NKENATHA; JUSTINA  
MDOBILU; GIDEON MARITIM; BELINDA  
CHAKA; CLIFFORD TARIMO; JAMES  
NDEDI; MILLY MIKALI AMDUSO; MOSES  
KINYUA; VALERIE NAIR; BAKARI  
NYUMBU; AISHA KAMBENGA;  
GEOFFREY KALIO; JANE KATHUKA;  
BERNICE NDETI; DAWN MULU; TABITHA  
KALIO; AQUILAS KALIO; CATHERINE  
KALIO; LILIAN KALIO; RAMADHANI  
MAHUNDI; HUSSEIN RAMADHANI;  
CHARLES MUNGOMA OLAMBO;  
CAROLINE OKECH; ENOS NZALWA;  
HINDU OMARI IDI; ALI HUSSEIN ALI;  
OMAR IDI; HAMIDA IDI; MAHAMUD  
OMARI IDI; RASHID OMAR IDI; FATUMA  
OMAR; DOMINIC MUSYOKA KITHUVA;  
KAMALI MUSYOKA KITHUVA; BEATRICE  
MARTHA KITHUVA; TITUS KYALO  
MUSYOKA; BENSON MALUSI MUSYOKA;  
CAROLINE KASUNGO MGALI; MONICA  
WANGARI MUNYORI; MOHAMED  
ABDALLAH MNYOLYA; NURI HAMISI  
SULTANI; NAFISA MALIK; ELIYA ELISHA  
PAUL; GRACE MAKASI PAUL; BLASIO  
KUBAI; FREDERICK MALOBA;  
ELIZABETH MALOBA; MARGARET  
MALOBA; LEWIS MALOBA; MARLON  
MALOBA; SHARON MALOBA; KENNETH  
MALOBA; JOSIAH OWUOR; EDWINA  
OWUOR; VINCENT OWUOR; WARREN  
OWUOR; PETER MACHARIA; GRACE  
GICHO; DIANA MACHARIA; NGUGI  
MACHARIA; MARGARET NJOKI NGUGI;

JOHN NGUGI; ANN RUGURU; DAVID NGUGI; PAUL NGUGI; STANLEY NGUGI; JULIANA ONYANGO; MARITA ONYANGO; EVANS ONSONGO; MARY ONSONGO; ENOCH ONSONGO; PERIS ONSONGO; VENICE ONSONGO; SALOME ONSONGO; BERNARD ONSONGO; GEORGE ONSONGO; EDWIN ONSONGO; GLADYS ONSONGO; PININA ONSONGO; IRENE KUNG'U; JOSEPH INGOS; DIANA KIBODYA; CHARLES KABUI; BARBARA OLAO; ALLAN OLAO; AUDREY PUSSY; MARGARET MURIGI; BELONCE MURIGI; FAITH MURIGI; MISCHECK MURIGI; FAITH MUTINDI; CHARLES OPONDO; RISPAH ABDALLAH; MAJDOLINE; ABDALLAH; JOSEPH ABDALLAH; CHRISTINE NABWIRE BWAKU; EPHRAIM ONYANGO BWAKU; BETTY KAGAI; NORMAN KAGAI; WENDY KAGAI; CHARLES KAGAI; TABITHA KAGAI; WALLACE NJOREGE NYOIKE; LUCY NYAWIDA KARIGI; STEVEN KARIGI; MARTIN KARIGI; CAROLINE KARIGI; DANIEL KIARIE; ANN WAIRIMU KIARIE; MARYANN NJOKI KIARIE; ANTHONY KIARIE; BARBARA KIARIE; EDMUND KIARIE KIBURU; BERNARD MACHARIA; JOSHUA MAYUNZU; LEVINA MINJA; VIOLET MINJA; EMMANUEL MINJA; NICKSON MINJA; PETRONILA MUNGUTI; ALEX MUNGUTI; FELIX MUNGUTI; JOHN NDIBUI; GEORGE MWANGI; SIMON NGURE; LUCY KAMBO; JOHN NGURE; JOSEPH KAMBO; CATHERINE NJERI MWANGI; JACKSON NDUNGU; JACKLINE WAMBUI; JULIUS NYAMWENO; ELIZABETH OKELO; HELLEN OKELO; KENNEDY OKELO; RONALD OKELO; LESLIE ONONO; LAURA ONONO;

STEPHEN ONONO; ANDREW ONONO;  
RISPAH AUMA; JAEL OYOO; EDWIN  
OYOO; KATIMBA MOHAMED SELEMANI;  
ASHA ABDULLAH; RASHID KATIMBA;  
SAID KATIMBA; FRANCIS KWIMBERE;  
IRENE KWIMBERE; FREDERICK  
KWIMBERE; SANI KWIMBERE; FRANCIS  
OFISI; ANDREW OFISI; GIDEON OFISI;  
CONCEPTOR ORENDE; JOHN KISWILI;  
FRANCISO KYALO; POLYCHEP  
ODIHAMBO; ROSE NYETTE; PATRICK  
NYETTE; ERIC MWAKA; PETER MWAKA;  
FELIX MWAKA; CIVILIER MWAKA;  
ANIPHA MPOTO; INOSENSIA MPOTO;  
DENIS MPOTO; LYDIA GWARO; DEBORA  
GWARO; EMMANUEL GWARO; JAMES  
GWARO; MICHAEL KIMEU; WINNIE  
KIMEU; LUKAS KIMEU; GRACE (EUNICE)  
ONSONGO; JOSEPH GATHUNGA;  
MICHAEL MWANGI; MARY MUIRIRI;  
JONATHAN NDUTI; ANNE NGANGA  
MWANGI; ESTER NGANGA MWANGI;  
HENRY ALIVIZA SHITIAVAI; JUDY  
ALIVIZA; JACQUELINE ALIVIZA;  
COLLINS ALIVIZA; HUMPHREY ALIVIZA;  
JEFFREY MBUGUA; ALEX MBUGUA;  
WAMBUI KUNG'U; LORNA KUNG'U;  
EDWARD KUNG'U; GITONGA MWANIKE;  
TECHONIA OWITI; VALENTINA HIZA;  
CHRISTOPHER HIZA; CHRISTIANSON  
HIZA; CHRISTEMARY HIZA; SALIMA  
ISMAIL RAJABU; JOHN ZEPHANIA  
MBOGE; HARRIET CHORE; LESLIE  
SAMBUKI; PETER KUNIGO; BADAWY  
ITATI ALI; JAIRUS DAVID AURA; MARY  
ESTHER KIUSA; PETER NGIGI MUGO;  
LEONARD RAJAB WAITHIRA; GRACE  
WANJIRU WAITHIRA; JOSEPH NDUNGU  
WAITHIRA; JEFF RABAR; BEATRICE  
ATINGA; SAMMY OKERE; VICTOR

ADEKA; PURITY MAHONJA; JOYCE THADEI LOKOA; SELINA GAUDENS; DONNIE GAUDENS; JUDITH NANDI BUSERA; LEVIS MADAHANA BUSERA; CHRISTINE KAVAI BUSERA; EMMANUEL MUSAMBAYI BUSERA; AUGUST MAFFRY; ALISON MAFFRY; CAROLINE MAFFRY; ALICE MARY TALBOT; GEOFFREY TUPPER; FRIDA YOHAN MTITU; SHADRACK TUPPER; AGNES SENGA GEOFFREY TUPPER; JOAN ADUNDO; BERNARD ADUNDO; PAULINE ADUNDO; SAMUEL ADUNDO; THERESA ADUNDO; ISIDORE ADUNDO; ANNE ADUNDO; THOMAS ADUNDO; JANE KHABUCHI; MICHAEL TSUMA; IRENE KHABUCHI; BERYL SHIUMBE; ZACKARIA MUSALIA ATINGA; FLORENCE MUSALIA; ELLY MUSALIA; VALLEN ANDEYO; JURUHA MUSALIA; LYNETTE OYANDA; LINDA OYANDA; VERA JEAN OYANDA; FRIDAH MAKENA; RUTH GATWIRI MWIRIGI; JOAN KENDI NKNATHA; JOANNE OPORT; SALLY OPORT; YVONNE OPORT; ONAEL MDOBILU; PETER MDOBILU; JOHN MDOBILU; KATHERINE MDOBILU; IMMANUEL MDOBILU; ONAEL DAVID MDOBILU; JOSHUA DANIEL MDOBILU; HELLEN MARITIM; ALICE MARITIM; RUTH MARITIM; ANNAH MARITIM; SHARONE MARITIM; EDGAR MARITIM; SHEILA MARITIM; RAMMY ROTICH; PRISCA OWINO; GREG OWINO; CLARA OWINO; LEAH OWINO; GERALD OWINO; KENNETH OWINO; SALLY CECILIA MAMBOLEO; SALOME RATEMO; LUIS RATEMO; FREDERICK RATEMO; KEVIN RATEMO; DIXON INDIYA; JAMES CHAKA; STANLEY CHAKA; STACY CHAKA; ELIZABETH TARIMO; MARGARET

TARIMO; CORNELIUS KEBUNGO;  
PHOEBE KEBUNGO; ERASTUS NDEDAA;  
ANN SALAMBA; BEVERLYNE NDEDAA;  
CECILIA NDEDAA; HESBON LIHANDA;  
GLADIS LIHANDA; DICKSON LIHANDA;  
RUTH LIHANDA; VALENTINE NDEDAA;  
MAUREEN NDEDAA; BEATRICE AMDUSO;  
IREEN SEMO; JOAB AMDUSO; JUSTIN  
AMDUSO; MERCY NDIRITU;  
CHRISTOPHER NDIRITU; DENNIS  
KINYUA; EDWIN MAGOTHE; SEDRICK  
NAIR; TANYA NAIR; ENNA OMOLO; ASHA  
KILUWA; ALLY MAHUNDI; AMIRI  
MAHUNDI; ASHA MAHUNDI; EMMA  
MAHUNDI; JUMA MAHUNDI; MWAJABU  
MAHUNDI; MWAJUMBA MAHUNDI; SAID  
MAHUNDI; SHABAN MAHUNDI; YUSUPH  
MAHUNDI; CAROLINE OPATI; MONICAH  
OPATI; RUEL OPATI; SELIFAH OPATI;  
KEELIY MUSYOKA; MANZI MUSYOKA;  
SYUINDO MUSYOKA; GLADYS MUNANI  
MUSYOKA; JACKSON KITHUVA  
MUSYOKA; JANE MUTUA; MARY NZISIVA  
SAMUEL; OMAR ZUBARI OMAR; REHANA  
MALIK; MARY MERESIANA PAUL; JACOB  
GATI; ZAKAYO MATIKO; LOISE KUYA;  
PETER KUYA; PENINAH MUCII; DANIEL  
KUYA; AGNES KUBAI; CELESTINE  
KUBAI; BRIAN KUBAI; COLLIN KUBAI;  
SALINE KUBAI; WILLIAM MAINA;  
ELIZABETH NZAKU; PETER NGUGI;  
HESBON BULIMU; MARY BULIMU;  
JACKSON BULIMU; GODFREY BULIMU;  
MILICENT BULIMU; LYDIA BULIMU;  
RODGERS BULIMU; FRIDA BULIMU;  
EMMILY BULIMU; MERCY BULIMU;  
KEVIN AYERS; CARL CRONIN; DWAYNE  
HALL; RUSSELL JARVIS; MICHAEL  
KELLEY; ERNEST KELLEY; RUTH  
KELLEY; LISA FLETCHER; DENNIS

KELLEY; TERESA CEARLEY; WILLIAM KILGORE; MYRON KYLE; GARY LEWIS; ESTATE OF JACK LEE MARTIN; LINDA MARTIN; JAMES N. MARTIN; JAMES N. MARTIN, JR.; JOE CARROLL MARTIN; JEB SCOTT MARTIN; JILL BARTON; DEBORAH MARSHALL; STACEY MCGINNIS; CHARLES R. OGLE; MELANIE OGLE; MICHAEL OROSS; MEGUNAH QEHALTH; EUGENE SMITH; BRIAN TEEK; VIRGIL T. YOUNG, JR.; ISIAH YOUNG; CHYLA YOUNG;

Plaintiffs,

v.

IRAN AND CHINA INVESTMENT DEVELOPMENT GROUP d/b/a LUBIAN.COM;

Defendant.

## INTRODUCTION

1. The Islamic Republic of Iran (“Iran”) is the world’s leading sponsor of terrorism, and, as a result, is subject to some of the world’s most stringent economic sanctions. Those sanctions are a thorn in Iran’s side because they prevent Iran from capitalizing on its main industry—energy—and deny Iran access to traditional banking institutions. Accordingly, the Iranian government has endeavored for years to circumvent those sanctions through any means possible, including through the use of intermediary agencies and instrumentalities such as the Iran and China Investment Development Group (the “Iran-China Group”) and its “LuBian” Bitcoin mine, whose more than 127,000 Bitcoin (“Bitcoin”) seized by the U.S. government is the ultimate target of this action for attachment and turnover under the Terrorism Risk Insurance Act and New York’s CPLR.

2. One of Iran’s most recent sanctions-defying gambits revolves around its extensive efforts to mine and deal in cryptocurrencies. Iranian officials have openly advertised the role that cryptocurrencies play in the nation’s strategy to circumvent sanctions, explaining that mining digital currencies is “a tool for circumventing sanctions,” that “digital currency is most efficient during times of sanctions,” and that because “cryptocurrency facilitate[s] the movement and transfer of money to any point in the world,” it “help[s] us at the time of sanctions.” Cryptocurrency in particular helps Iran to launder proceeds of its energy industry. While Iran cannot directly export its oil and natural gas to a host of other countries, its leaders have recognized that Iran instead can convert that oil and natural gas to electricity and then “creat[e] a form of electricity export” through cryptocurrency mining, where energy is converted into digital assets—a purported “solution” to Iran’s sanctions woes.

3. To implement this strategy, Iran has promulgated new decrees to provide special tax treatment for cryptocurrencies, has subsidized energy to cryptocurrency miners, and has

undertaken other sustained efforts to make itself a cryptocurrency haven. A key aspect of that strategy was Iran’s partnership with the Iran-China Group, an Iranian joint-stock company that created and operated a cryptocurrency mining pool known as “LuBian.” In connection with Iran’s repeated and ongoing efforts to skirt U.S. sanctions, Iranian state-owned entities worked to import powerful servers and mining machines on sanctioned vessels that the Iran-China Group used to build a massive cryptocurrency mine in the Rafsanjan Special Economic Zone, in Iran’s central Kerman province. Drawing hundreds of megawatts of energy from the power station for a nearby ferrochrome plant, the Iran-China Group was able to mine thousands of Bitcoin and maintain LuBian’s “pool,” which eventually grew to at least 127,271 Bitcoin.

4. The Iran-China Group worked closely with Iranian officials on the project, which was built with the support of the Iranian military. An advisor to Iran’s then-President, Hassan Rouhani, opened the mine, and key governmental officials attended the formal opening. LuBian boasted of its strong ties to the Iranian regime, explaining that LuBian had established its “own customs clearance channels,” “good local resources in Iran,” and “good relations” with Iran’s Ministry of Energy, Ministry of Foreign Affairs, “and even the army.” Working hand-in-hand with governmental authorities, the Iran-China Group built and then donated “massive” electric infrastructure for the project back to Iran’s state-owned power company, Tavanir.

5. The Iran-China Group’s bid to help Iran launder its domestic energy into cryptocurrency through its LuBian mining operation came crashing down, however, in December 2020. That month, an anonymous “whitehat”—slang for an ethical hacker—breached LuBian’s pool and stole approximately 127,271 Bitcoin that LuBian had accumulated. LuBian repeatedly attempted to make contact with the hacker to secure return of that cryptocurrency, even offering a reward, but to no avail. Eventually, the hacker instead apparently handed over the keys to the Iran-

China Group's, *i.e.*, LuBian's, cryptocurrency wallets (containing the Bitcoin at issue) to the U.S. government, where, on information and belief, the keys—and thus the cryptocurrency—remain.

6. Pursuant to the Terrorism Risk Insurance Act ("TRIA"), Pub. L. 107-297, 116 Stat. 2322 (Nov. 26, 2002), codified at 28 U.S.C. § 1610 Note, Federal Rule of Civil Procedure 69, and New York CPLR §§ 5225(b) and 5227, Plaintiffs now bring this action to execute on the Iran-China Group's—*i.e.*, LuBian's—127,271 Bitcoin in the government's custody.

7. Plaintiffs are judgment creditors of Iran—collectively awarded \$23,206,959,532.03 in damages, including \$9,117,379,610.49 in compensatory damages and \$11,175,094,737.54 in punitive damages—and are all victims or family members of victims of Iranian-sponsored terrorism. Their lives were forever altered by the 2006 and 2007 kidnapping and murders of four U.S. service members on deployment in Iraq (the "Iraq Abductions and Murders"), the 2001 Hamas bombing of a Sbarro restaurant in Jerusalem, Israel (the "Jerusalem Bombing"), the 1998 al Qaeda bombings on the U.S. embassies in Tanzania and Kenya (the "Embassy Bombings"), and the 1983 Hezbollah bombing of the U.S. Marine barracks in Beirut, Lebanon (the "Beirut Bombing"). The men, women, and children killed and injured during these terrorist attacks included American heroes—men and women stationed abroad in the U.S. military and Foreign Service, or local employees working at U.S. embassies—and a 15-year-old U.S. citizen. When the bombs were detonated and murders carried out in Tanzania, Kenya, Beirut, Jerusalem, and Iraq, their bodies and futures were shattered, resulting in indelible physical, emotional, and psychological devastation.

8. The U.S. District Court for the District of Columbia (the "D.C. District Court") has determined on multiple occasions that Iran is liable to these victims for their suffering.

9. In 2015, the families and estates of the U.S. service members who were abducted and murdered by the Asa’ib Ahl al-Haq (“AAH”) terrorist organization while serving in Iraq—including lead Plaintiff Noala Fritz—initiated a lawsuit against Iran to hold it accountable for those deaths. The D.C. District Court found that Iran provided the terrorist organization with material support—support that constituted a “necessary ingredient” “in the chain of events that culminated in the injuries and deaths of” the four U.S. soldiers. Accordingly, the Court found Iran liable to the Plaintiffs for damages and awarded a judgment of \$248,948,689.

10. In a series of earlier actions, the D.C. District Court determined that Hezbollah received substantial support from Iran in carrying out the Beirut Bombing and that the “formation and emergence of Hezbollah as a major terrorist organization” in the first place was “due to the government of Iran.” The Court determined that Iran should “be punished to the fullest extent legally possible for the bombing in Beirut” and awarded Plaintiffs massive judgments.

11. After prolonged litigation, the D.C. District Court similarly determined in 2011 that al Qaeda could not have carried out the Embassy Bombings in Kenya and Tanzania without Iran’s support and sponsorship, and that the “[s]upport from Iran and Hezbollah” in particular “was critical to al Qaeda’s execution of the 1998 embassy bombings.” As a result of Iran’s sponsorship of al Qaeda’s terrorism, the court held Iran liable to Plaintiffs for, as relevant here, a total of nearly \$8.7 billion.

12. In 2015, the D.C. District Court further determined that Iran was liable to the family and estate for the death of a 15-year-old U.S. citizen who was one of the many victims of the Jerusalem Bombing. The Court specifically found that the attack was a “clear” consequence of Iran’s provision of “material support of Hamas’ terrorist activities.” The D.C. District Court entered judgment against Iran in the total amount of \$131,191,019.

13. Together these Plaintiffs have billions of dollars outstanding on their judgments, which Iran has refused to pay.

14. Faced with Iran’s steadfast refusal to honor its legal obligations and satisfy these outstanding judgments, Plaintiffs are entitled to execute on the 127,271 Bitcoin currently in the custody of the United States (“Garnishee”), or so much of the Bitcoin as is ultimately necessary to fully satisfy Plaintiffs’ outstanding judgments.<sup>1</sup> The case for execution is clear. TRIA provides that, “[n]otwithstanding any other provision of law,” those who hold judgments against “a terrorist party” may execute on the “blocked assets,” which are defined to include assets “seized . . . by the United States,” of that terrorist party or its “agency or instrumentality.” TRIA § 201(a), (d)(2). Iran is a well-established “terrorist party”; its assets are blocked pursuant to multiple regulations and executive orders, *see* 31 C.F.R. §§ 510.211, 594.201(a)(5); and the Iran-China Group, through the LuBian mining pool, operated as Iran’s “agency or instrumentality” by materially assisting Iran in avoiding sanctions while laundering Iran’s energy resources through the mining of cryptocurrency. And by taking direction from Iran to deliver crypto to the Central Bank or to designated Iranian entities, the Iran-China Group further served as an agent or instrumentality of Iran. As a result, the Iran-China Group’s blocked assets in the United States, which includes the hacked LuBian Bitcoin currently in the custody of the United States, should be turned over to Plaintiffs to compensate these long-suffering victims of the terrorist acts sponsored by Iran.

#### **JURISDICTION AND VENUE**

15. This Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Plaintiffs seek relief under federal law—namely, TRIA. *See Weinstein v. Islamic*

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<sup>1</sup> The value of Bitcoin is volatile and subject to significant daily fluctuation, making it difficult if not impossible to determine at this time the amount of Bitcoin that will ultimately be necessary to satisfy Plaintiffs’ outstanding judgments.

*Republic of Iran*, 609 F.3d 43, 50 (2d Cir. 2010) (finding “it clear beyond cavil that Section 201(a) of the TRIA provides courts with subject matter jurisdiction over post-judgment execution and attachment proceedings”).

16. This Court has personal jurisdiction over Defendant the Iran-China Group pursuant to Federal Rule of Civil Procedure 4(k)(1)(A), which permits this Court to exercise personal jurisdiction to the extent allowed by New York statutes. CPLR § 301 provides that courts “may exercise such jurisdiction over persons, property, or status as might have been exercised heretofore”—including, as relevant here, quasi-in rem jurisdiction. *See Banco Ambrosiano, S.P.A. v. Artoc Bank & Tr. Ltd.*, 464 N.E.2d 432, 435 (N.Y. 1984). Quasi-in rem jurisdiction is appropriate when the relevant property in the forum “is closely related to the plaintiff’s claim,” and particularly when the defendant has “other ties” to the forum. *Id.* at 435. Here, the presence of the Iran-China Group’s property in New York is central to Plaintiffs’ claim. And, moreover, LuBian has appeared in, and submitted to the jurisdiction of, this Court for the purpose of asserting its claims to the Bitcoin in the United States’ parallel, pending forfeiture action concerning the Bitcoin transferred from the Iran-China Group’s LuBian mining pool. *See* Dkt. 14, *United States v. Approximately 127,271 Bitcoin (“BTC”) Previously Stored At The Virtual Currency Addresses Listed In Attachment A, And All Proceeds Traceable Thereto (“Approximately 127,271 Bitcoin”)*, No. 25-cv-5745 (E.D.N.Y. Dec. 10, 2025); Dkt. 23, *Approximately 127,271 Bitcoin*, No. 25-cv-5745 (E.D.N.Y. Dec. 17, 2025). Thus, the prerequisites for quasi-in rem jurisdiction are satisfied.

17. Venue is proper in this Court pursuant to 28 U.S.C. § 1391. Under Section 1391(b)(2), “a substantial part of the property that is the subject of the action” is situated in the Eastern District of New York because, on information and belief, the United States maintains custody of the Bitcoin in the Eastern District of New York. Venue is also appropriate in the Eastern

District of New York because this Court is already exercising jurisdiction over those Bitcoin in *Approximately 127,271 Bitcoin*, No. 25-cv-5745 (E.D.N.Y.). *See Princess Lida of Thurn & Taxis v. Thompson*, 305 U.S. 456, 466 (1939) (where “two suits are in rem, or quasi in rem, so that the court, or its officer, has possession or must have control of the property which is the subject of the litigation,” “the court first assuming jurisdiction over property may maintain and exercise that jurisdiction to the exclusion of the other”). Finally, venue is appropriate because “a substantial part of the events or omissions giving rise to the claim” occurred in this district. 28 U.S.C. § 1391(b)(2).

### **THE PARTIES**

18. Plaintiffs are direct victims and surviving family members of the Iraq Abductions and Murders, Jerusalem Bombing, Embassy Bombings, and the Beirut Bombing—all attacks carried out with the critical material support of the Iranian government.

19. Plaintiffs include U.S. service members deployed in Iraq and Beirut; U.S. foreign service officers and Tanzanian nationals who were employed by the U.S. embassies and on duty during the Embassy Bombings; and the family members of a fifteen-year-old U.S. citizen killed by a terrorist attack while out to eat in Jerusalem. These individuals and their family members have suffered severe physical and psychological injuries, including loss of life, loss of limbs, permanent disabilities, physiological trauma, and devastating and debilitating emotional distress.

20. Defendant is the Iran and China Investment Development Group, an agency or instrumentality of Iran, which does business for purposes of mining and holding cryptocurrency assets as “LuBian” or “Lubian.com.”

21. Defendant is an agency or instrumentality of the Judgment Debtor, the Islamic Republic of Iran. Iran has been designated a sponsor of terrorism pursuant to Section 6(j) of the Export Administration Act of 1979, 50 U.S.C. App. § 2405(j), beginning January 19, 1984, and

therefore is a “terrorist party” as defined by TRIA, § 201(a). *See Havlish v. Taliban*, 152 F.4th 339, 360 (2d Cir. 2025) (noting that “the state of Iran” is “a terrorist party” under TRIA); *see also State Sponsors of Terrorism*, U.S. Dep’t of State, <https://tinyurl.com/49fm3uan>.

22. The Garnishee with custody of the Bitcoin at issue is the United States of America.

### **FACTUAL ALLEGATIONS**

#### **I. Plaintiffs Hold Billions of Dollars of Unpaid Judgments Against Iran**

23. Iran’s notorious efforts to sponsor terrorist attacks throughout the world had devastating consequences for Plaintiffs, who, across several decades, fell victim to the series of Iranian-sponsored attacks described below.

##### **A. The Iraq Abductions And Murders**

24. In October 2006 and January 2007, four U.S. soldiers were abducted and assassinated while serving in Iraq.<sup>2</sup> They include Ahmed Al-Taie, who was abducted in Baghdad, Iraq, and Jacob Fritz, Johnathan Chism, and Shawn Falter, who all were abducted from Karbala, Iraq.

25. On October 23, 2006, U.S. Army Staff Sergeant Ahmed Al-Taie, a native Iraqi and naturalized U.S. Citizen, was traveling to his wife’s residence in Baghdad. Before arriving, he was kidnapped by members of Jaysh al-Mahdi (“JAM”), an “early beneficiary of Iran.”<sup>3</sup> The U.S. Army embarked on an immediate and extensive search-and-rescue mission to locate their missing comrade.<sup>4</sup> By the following month, Al-Taie’s kidnappers realized he was an American soldier. They took advantage of this fact by demanding the United States engage in a prisoner exchange.<sup>5</sup>

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<sup>2</sup> See *Fritz v. Islamic Republic of Iran*, 320 F. Supp. 3d 48, 55 (D.D.C. 2018).

<sup>3</sup> *Id.* at 61, 74.

<sup>4</sup> *Id.* at 73.

<sup>5</sup> *Id.* at 74.

26. Al-Taie was assassinated within a year of his kidnapping, and his remains, in an advanced state of decomposition, were released in 2012. While in captivity, he was subject to regular beatings before being shot in the torso and neck.<sup>6</sup>

27. Although Al-Taie's initial kidnapping was perpetrated by JAM, he was quickly turned over to AAH, and it was AAH who was responsible for the torture and execution.<sup>7</sup>

28. On January 20, 2017, AAH conducted a coordinated attack on the Provincial Joint Coordination Center ("PJCC") in Karbala, Iraq. First Lieutenant Jacob Fritz, Specialist Johnathan Chism, and Private First-Class Shawn Falter worked at the PJCC as part of the United States' efforts in the region.<sup>8</sup>

29. A small force of AAH militants bypassed security and entered the PJCC, where, after "subduing Iraqi police" and creating a diversion with small-arms fire, they kidnapped Fritz, Chism, Falter, and Captain Brian Freeman.<sup>9</sup>

30. After handcuffing the victims, the militants sped from the compound and made their way through a smuggling route, before learning that an upcoming Iraqi checkpoint would be on the lookout for them. They altered their route and changed out of their clothing.<sup>10</sup>

31. The assailants then shot the captives multiple times and abandoned their equipment. By the time the Iraqi Army arrived, only Freeman was still alive, and he died a short time later.

32. These incidents of murder and kidnapping were carried out by the AAH terrorist organization, which is a network of Iraqi Shia militias that relied on training, funding, and support from Iran.<sup>11</sup>

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<sup>6</sup> *Id.* at 75.

<sup>7</sup> *Id.* at 74.

<sup>8</sup> *Id.* at 65.

<sup>9</sup> *Id.* at 65–66.

<sup>10</sup> *Id.* at 68–69.

<sup>11</sup> *Id.* at 55.

**B. The Iraq Abductions And Murders D.C. District Court Action**

33. On March 30, 2015, a group of plaintiffs composed of the estates and family members of the four kidnapping and murder victims brought suit against Iran under 28 U.S.C. § 1605 of the Foreign Sovereign Immunities Act (“FSIA”) for Iran’s role in those crimes.<sup>12</sup> The *Fritz* plaintiffs served process on Iran on January 31, 2017.<sup>13</sup> Iran failed to respond.

34. The D.C. District Court ordered default judgment against Iran on August 2, 2018, and appointed a special master to hear the damages claims of the plaintiffs. *Fritz v. Islamic Republic of Iran*, 320 F. Supp. 3d 48, 92 (D.D.C. 2018).<sup>14</sup> Based on the *Fritz* plaintiffs’ evidentiary showing and pursuant to the rigorous factual findings required under the FSIA’s Section 1608, the court found that “Iran provided AAH with material support” for the kidnappings and murders, including training, intelligence, and “essential” financial support, and “[t]he support that Iran provided to AAH was not only a ‘substantial factor’ in the chain of events that culminated in the injuries and deaths of Fritz, Chism, Falter, and Al-Taie, it was a necessary ingredient.” *Id.* at 84-86; *see also Fritz v. Islamic Republic of Iran*, 324 F. Supp. 3d 54, 58 (D.D.C. 2018).

35. The D.C. District Court adopted the special master’s damages recommendations and entered partial final judgment against Iran on August 20, 2018, in the total amount of \$248,948,689. *See* Dkt. 94, *Fritz v. Islamic Republic of Iran*, No. 15-cv-456 (D.D.C. Aug. 20, 2018).

36. Iran is jointly and severally liable for the entire amount of the judgment but has failed to take any steps to satisfy the judgment. Plaintiffs have sought for years to compel Iran to satisfy their respective judgments, but Iran has successfully evaded pursuit from Plaintiffs and the

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<sup>12</sup> *See generally Fritz v. Islamic Republic of Iran*, No. 15-cv-456 (D.D.C.) (“*Fritz Suit*”).

<sup>13</sup> *Fritz Suit* Dkt. 19.

<sup>14</sup> *See also Fritz Suit* Dkt. 90.

many other victims of terrorism to whom it is liable under U.S. law. Indeed, Iran has nothing but disdain for U.S. courts, denouncing U.S. court rulings against the country as “theft.”<sup>15</sup>

### **C. The Jerusalem Bombing**

37. In August 2001, an operative of the militant Islamic group Hamas detonated a bomb at a Sbarro restaurant in Jerusalem, Israel.<sup>16</sup>

38. Iran and Syria provided Hamas with support and encouragement to carry out the Jerusalem attack.

39. The attack killed 15 people, including 15-year-old U.S. citizen Malka Roth, and injured approximately 130 more.<sup>17</sup>

### **D. The Jerusalem Bombing D.C. District Court Action**

40. On July 28, 2011, nine (9) members of the Roth family, including representatives of their estate, filed a suit against Iran pursuant to 28 U.S.C. § 1605 of the FSIA, seeking damages for the injuries and death of Malka Roth.<sup>18</sup> Several months later, on September 16, 2012, the *Roth* plaintiffs served process on Iran.<sup>19</sup> Iran failed to respond, and as a result, the clerk of the D.C. District Court entered default against it on April 21, 2014.<sup>20</sup>

41. On January 27, 2015, the D.C. District Court granted default judgment in the *Roth* action. *See* Dkt. 43, *Roth v. Islamic Republic of Iran*, No. 11-cv-1377 (D.D.C. Jan. 27, 2015). The Court found that Malka Roth’s death and the pain and suffering her family experienced as a result were “consequences [that] were ‘reasonably certain’ to occur as a result of [Iran’s] material support

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<sup>15</sup> See, e.g., *Iran denounces U.S. ruling awarding Iran money to bomb victims: TV*, Reuters (Apr. 21, 2016), <https://tinyurl.com/erc3d39u>.

<sup>16</sup> *Suicide bombing at the Sbarro pizzeria in Jerusalem*, Israel Ministry of Foreign Affairs, <https://tinyurl.com/k3ca8rt4>; *Roth v. Islamic Republic of Iran*, 78 F. Supp. 3d 379, 387 (D.D.C. 2015).

<sup>17</sup> *Id.*

<sup>18</sup> *See generally Roth v. Islamic Republic of Iran*, No. 11-cv-1377 (D.D.C.) (“*Roth Suit*”).

<sup>19</sup> *Roth Suit* Dkt. 19.

<sup>20</sup> *Roth Suit* Dkt. 24.

of Hamas' terrorist activities.”<sup>21</sup> The D.C. District Court entered judgment against Iran in the total amount of \$131,191,019.<sup>22</sup>

42. Iran is jointly and severally liable for the entire amount of the judgment but has refused to satisfy it.

#### **E. The Embassy Bombings**

43. In 1998, al Qaeda carried out simultaneous suicide bombings on the U.S. embassies in Dar es Salaam, Tanzania, and Nairobi, Kenya. More than 224 people were killed and more than 5,000 were wounded in these horrific attacks.

44. Iran deliberately provided material support to al Qaeda's planning, recruitment, and training activities, equipping al Qaeda to carry out the Embassy Bombings.

#### **F. The Embassy Bombings D.C. District Court Actions**

45. Several suits against Iran and the Republic of Sudan (which also provided support to al Qaeda) followed. As relevant here, on August 5, 2008, Winifred Wairimu Wamai, individually and as a representative of the Estate of Adam Titus Wamai, who was murdered in the Embassy Bombings, filed suit with a total of one hundred and ninety-six (196) plaintiffs;<sup>23</sup> likewise, on August 5, 2008, Milly Mikali Amduso, who was injured in the Embassy Bombings, brought suit with one hundred and thirteen (113) total plaintiffs.<sup>24</sup> On August 7, 2008, Mary Onsongo brought suit individually and on behalf of the Estate of Evans Onsongo, who was murdered in the

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<sup>21</sup> *Roth v. Islamic Republic of Iran*, 78 F. Supp. 3d 379, 404 (D.D.C. 2015).

<sup>22</sup> *Roth* Suit Dkt. 43.

<sup>23</sup> See generally *Wamai v. Republic of Sudan*, No. 08-cv-1349 (D.D.C.) (“*Wamai Suit*”).

<sup>24</sup> See generally *Amduso v. Republic of Sudan*, No. 08-cv-1361 (D.D.C.) (“*Amduso Suit*”).

Embassy Bombings, with a total of fourteen (14) plaintiffs.<sup>25</sup> On July 24, 2012, Monicah Okoba Opati filed suit, along with two hundred and eighty-three (283) plaintiffs.<sup>26</sup>

46. After each set of plaintiffs served process on Iran, Iran failed to respond to all of these actions, and defaults were entered against it on October 6, 2009 in the *Amduso* action,<sup>27</sup> on June 2, 2010 in the *Onsongo* action,<sup>28</sup> on June 4, 2010 in the *Wamai* action,<sup>29</sup> and on June 18, 2014 in the *Opati* action.<sup>30</sup> In accordance with the FSIA, the D.C. District Court held a consolidated “three-day hearing on liability and damages,” during which the Embassy Bombing Plaintiffs independently “established their claims ‘by evidence satisfactory to the court.’”<sup>31</sup> Based on the record before it, the D.C. District Court found Iran “liable for damages suffered by the plaintiffs” because the country “provided material aid and support to al Qaeda [operatives].”<sup>32</sup> Specifically, “[t]he Iranian defendants, through Hezbollah, provided explosives training to Bin Laden and al Qaeda and rendered direct assistance to al Qaeda operatives.”<sup>33</sup> That “[s]upport from Iran and Hezbollah,” the D.C. District Court concluded, “was critical to al Qaeda’s execution of the 1998 embassy bombings.”<sup>34</sup>

47. The court then referred the cases to special masters to calculate damages. On July 25, 2014, the court awarded \$1,755,878,431.22 to the *Amduso* plaintiffs; \$3,566,104,489.58 to the *Wamai* plaintiffs; and \$199,106,578.19 to the *Onsongo* plaintiffs. *See* Dkt. 254, *Amduso v. Republic of Sudan*, No. 08-cv-1361 (D.D.C. July 25, 2014); Dkt. 245, *Wamai v. Republic of Sudan*,

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<sup>25</sup> See generally *Onsongo v. Republic of Sudan*, No. 08-cv-1380 (D.D.C.) (“*Onsongo Suit*”).

<sup>26</sup> See generally *Opati v. Republic of Sudan*, No. 12-cv-1224 (D.D.C.) (“*Opati Suit*”), Dkt. 24.

<sup>27</sup> *Amduso* Suit Dkt. 40.

<sup>28</sup> *Onsongo* Suit Dkt. 23.

<sup>29</sup> *Wamai* Suit Dkt. 36.

<sup>30</sup> *See Opati Suit* Dkt. 42.

<sup>31</sup> *Owens v. Republic of Sudan*, 826 F. Supp. 2d 128, 134-35 (D.D.C. 2011) (quoting 28 U.S.C. § 1608(e)).

<sup>32</sup> *Id.* at 135, 139.

<sup>33</sup> *Id.* at 135.

<sup>34</sup> *Id.* at 139.

No. 08-cv-1349 (D.D.C. July 25, 2014); Dkt. 231, *Onsongo v. Republic of Sudan*, No. 08-cv-1380 (D.D.C. July 7, 2014). In *Opati*, the court also referred the claims to special masters and, likewise on July 24, 2014, granted judgment to the plaintiffs in the amount of \$3.1 billion. *See* Dkt. 44, *Opati v. Republic of Sudan*, No. 12-cv-1224 (D.D.C. July 25, 2014).

48. Iran is jointly and severally liable for the entire amount of the judgments but has refused to satisfy them.

#### **G. The Beirut Bombing**

49. On October 23, 1983, a Hezbollah terrorist detonated a massive truck bomb at the U.S. Marine barracks in Beirut, Lebanon.

50. Iran was determined to have provided “massive material and technical support” to Hezbollah, which directly facilitated the Beirut Bombing.<sup>35</sup>

51. The Beirut Bombing killed 241 U.S. servicemen and wounded many others, including Plaintiffs and their family members in this action.<sup>36</sup>

#### **H. The Beirut Bombing D.C. District Court Actions**

52. Iran’s material support for the Beirut Bombing occasioned numerous actions in the D.C. District Court holding Iran liable under the FSIA and imposing corresponding damages, discussed in relevant part below.

53. On September 7, 2007, the D.C. District Court awarded default judgments against Iran on behalf of the plaintiffs in the consolidated actions *Peterson v. Islamic Republic of Iran*, No. 01-cv-2094 (D.D.C.), and *Boulos v. Islamic Republic of Iran*, No. 01-cv-2684 (D.D.C.). *See* Dkt. 228, *Peterson v. Islamic Republic of Iran*, No. 01-cv-2094 (D.D.C. Sept. 7, 2007). The district

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<sup>35</sup> *Fain v. Islamic Republic of Iran*, 856 F. Supp. 2d 109, 118 (D.D.C. 2012).

<sup>36</sup> *See Beirut Marine Barracks Bombing Fast Facts*, CNN (Nov. 13, 2019), <https://tinyurl.com/y6pu34aa>.

court awarded \$2,656,944,877.00 in compensatory damages and no punitive damages, for a total judgment of \$2,656,944,877.00.

54. On September 20, 2010, the D.C. District Court awarded revised default judgments against Iran on behalf of the plaintiffs in the consolidated actions *Spencer v. Islamic Republic of Iran*, No. 06-cv-750 (D.D.C.), *Arnold v. Islamic Republic of Iran*, No. 06-cv-516 (D.D.C.), *Valore v. Islamic Republic of Iran*, No. 03-cv-1959 (D.D.C.), and *Bonk v. Islamic Republic of Iran*, No. 08-cv-1273 (D.D.C.). See Dkt. 71, *Valore v. Islamic Republic of Iran*, No. 03-cv-1959 (D.D.C. Sept. 20, 2010). The district court awarded \$290,291,092.00 in compensatory damages and \$1,000,000,000.00 in punitive damages, for a total judgment of \$1,290,291,092.00.

55. On September 24, 2010, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Murphy v. Islamic Republic of Iran*, No. 06-cv-596 (D.D.C.). Dkt. 66, *Murphy v. Islamic Republic of Iran*, No. 06-cv-596 (D.D.C. Sept. 24, 2010). The district court awarded \$31,865,570.00 in compensatory damages and \$61,302,581.60 in punitive damages, for a total judgment of \$93,168,141.60.

56. On December 21, 2011, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Bland v. Islamic Republic of Iran*, No. 05-cv-2124 (D.D.C.). See Dkt. 70, *Bland v. Islamic Republic of Iran*, No. 05-cv-2124 (D.D.C. Dec. 21, 2011). The district court awarded \$227,805,908.00 in compensatory damages and \$955,652,324.00 in punitive damages, for a total judgment of \$1,183,458,232.00.

57. On March 28, 2012, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *O'Brien v. Islamic Republic of Iran*, No. 06-cv-690 (D.D.C.). See Dkt. 41, *O'Brien v. Islamic Republic of Iran*, No. 06-cv-690 (D.D.C. Mar. 28, 2012). The district

court awarded \$10,050,000.00 in compensatory damages and \$34,572,000.00 in punitive damages, for a total judgment of \$44,622,000.00.

58. On March 30, 2012, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Davis v. Islamic Republic of Iran*, No. 07-cv-1302 (D.D.C.). *See* Dkt. 123, *Davis v. Islamic Republic of Iran*, No. 07-cv-1302 (D.D.C. Mar. 30, 2012). The district court awarded \$486,918,005.00 in compensatory damages and \$1,674,997,937.00 in punitive damages, for a total judgment of \$2,161,915,942.00.

59. On March 20, 2012, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Anderson v. Islamic Republic of Iran*, No. 08-cv-535 (D.D.C.). *See* Dkt. 43, *Anderson v. Islamic Republic of Iran*, No. 08-cv-535 (D.D.C. Mar. 20, 2012). The district court awarded \$7,500,000 in compensatory damages and \$25,800,000 in punitive damages to these three Plaintiffs, for a total judgment of \$33,300,000.

60. On July 3, 2012, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Brown v. Islamic Republic of Iran*, No. 08-cv-531 (D.D.C.). *See* Dkt. 57, *Brown v. Islamic Republic of Iran*, No. 08-cv-531 (D.D.C. July 3, 2012). The district court awarded \$183,281,294.00 of compensatory damages and \$630,487,651 of punitive damages, for a total judgment of \$813,768,945.00.

61. On July 31, 2012, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Fain v. Islamic Republic of Iran*, No. 10-cv-628 (D.D.C.). *See* Dkt. 35, *Fain v. Islamic Republic of Iran*, No. 10-cv-628 (D.D.C. July 31, 2012). The district court awarded \$15,628,703.00 of compensatory damages and \$52,524,338.00 of punitive damages, for a total judgment of \$67,793,041.00.

62. On August 2, 2012, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Taylor v. Islamic Republic of Iran*, No. 10-cv-844 (D.D.C.). *See* Dkt. 26, *Taylor v. Islamic Republic of Iran*, No. 10-cv-844 (D.D.C. Aug. 2, 2012). The district court awarded \$148,000,000.00 of compensatory damages and \$509,120,000.00 of punitive damages, for a total judgment of \$657,120,000.00.

63. On October 14, 2014, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Spencer v. Islamic Republic of Iran*, No. 12-cv-42 (D.D.C.). *See* Dkt. 51, *Spencer v. Islamic Republic of Iran*, No. 12-cv-42 (D.D.C. Oct. 14, 2014). The district court awarded \$17,111,376.00 of compensatory damages and \$58,863,133.44 of punitive damages, for a total judgment of \$75,974,509.44.

64. On April 18, 2016, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Worley v. Islamic Republic of Iran*, No. 12-cv-2069 (D.D.C.). *See* Dkt. 74, *Worley v. Islamic Republic of Iran*, No. 12-cv-2069 (D.D.C. Apr. 18, 2016). The district court awarded \$58,580,424.00 in compensatory damages and \$201,516,659.00 in punitive damages, for a total judgment of \$260,097,083.00.

65. On May 31, 2020, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Bova v. Islamic Republic of Iran*, No. 15-cv-1074 (D.D.C.). *See* Dkt. 110, *Bova v. Islamic Republic of Iran*, No. 12-cv-1074 (D.D.C. May 31, 2020). The district court awarded \$348,718,279.00 in compensatory damages and \$1,199,590,880.00 in punitive damages, for a total judgment of \$1,548,309,159.00.

66. On May 3, 2022, the D.C. District Court awarded a default judgment against Iran on behalf of the plaintiffs in *Ayers v. Islamic Republic of Iran*, No. 18-cv-265 (D.D.C.). *See* Dkt. 69, *Ayers v. Islamic Republic of Iran*, No. 18-cv-265 (D.D.C. May 3, 2022). The district court

awarded \$73,306,625.00 in compensatory damages and \$252,174,790.00 in punitive damages, for a total judgment of \$325,481,415.00.

67. Iran is liable for the entire amount of the judgments but has refused to satisfy them.

### **I. Total Judgments Against Iran**

68. All judgment-holders—or their estates, heirs, or other beneficiaries or successors-in-interest—from the above-described suits are Plaintiffs in this action.

69. In total, Plaintiffs in this action have been awarded \$23,206,959,532.03 against Iran, including \$9,117,379,610.49 in compensatory damages. These judgments were entered to provide justice and compensation to the direct victims and victims' family members who suffered in numerous terrorist attacks enabled by Iran's state-sponsored terrorism. Iran has refused to voluntarily pay a single cent, and not one of the judgments has been fully satisfied. They continue to accrue post-judgment interest pursuant to 28 U.S.C. § 1961.

70. Plaintiffs and the total amounts of the judgments are individually listed in Attachment A.

71. In all of the above cases but one, *Roth*, the district courts entered orders pursuant to 28 U.S.C. § 1610(c) determining “that a reasonable period of time ha[d] elapsed following the entry of judgment,” thus permitting attachment and execution to proceed.<sup>37</sup> In *Roth*, judgment was

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<sup>37</sup> See Order, Dkt. 126, *Fritz v. Islamic Republic of Iran*, No. 15-cv-456 (D.D.C. Dec. 20, 2022); Order, Dkt. 213, *Amusso v. Republic of Sudan*, No. 08-cv-1361 (D.D.C. Apr. 19, 2016); Order, Dkt. 55, *Anderson v. Islamic Republic of Iran*, No. 08-cv-535 (D.D.C. Feb. 13, 2013); Second Order Concerning 28 U.S.C. § 1610(c), Dkt. 39, *Valore v. Islamic Republic of Iran*, No. 06-cv-750 (D.D.C. June 8, 2011); Order, Dkt. 82, *Ayers v. Islamic Republic of Iran*, No. 18-cv-265 (D.D.C. Dec. 15, 2025); Order, Dkt. 84, *Bland v. Islamic Republic of Iran*, No. 05-cv-2124 (D.D.C. October 4, 2012); Memorandum & Order, Dkt. 364, *Peterson v. Islamic Republic of Iran*, 1-cv-2094 (D.D.C. June 25, 2008); Order, Dkt. 119, *Bova v. Islamic Republic of Iran*, No. 15-cv-1074 (D.D.C. Oct. 13, 2022); Order, Dkt. 69, *Brown v. Islamic Republic of Iran*, No. 08-cv-531 (D.D.C. Feb. 13, 2013); Order, Dkt. 137, *Davis v. Islamic Republic of Iran*, No. 07-cv-1302 (D.D.C. Jan. 17, 2013); Order, Dkt. 48, *Fain v. Islamic Republic of Iran*, No. 10-cv-628 (D.D.C. Apr. 11, 2013); Order, Dkt. 113, *Fritz v. Islamic Republic of Iran*, No. 15-cv-456 (D.D.C. Mar. 18, 2020); Order Authorizing Enforcement of Judgment Pursuant to 28 U.S.C. § 1610(c), Dkt. 80, *Murphy v. Islamic Republic of Iran*, No. 06-cv-596 (D.D.C. Oct. 7, 2011); Order, Dkt. 53, *O'Brien v. Islamic Republic of Iran*, No. 06-cv-690 (D.D.C. Feb. 13, 2013); Order, Dkt. 273, *Onsongo v. Republic of Sudan*, No. 08-cv-1380 (D.D.C. Apr. 19, 2016); Order, Dkt. 86, *Opatti v. Republic of Sudan*, No. 12-cv-1224 (D.D.C. Apr. 19, 2016); Order, Dkt. 61, *Spencer v. Islamic Republic of Iran*, No.

entered on January 27, 2015, more than 10 years ago.<sup>38</sup> Iran’s failure to satisfy the *Roth* judgments for more than a decade easily satisfies Section 1610(c)’s requirement that a reasonable period of time elapse following the entry of judgment before enforcement commences.

## **II. Plaintiffs Are Entitled To Execute On The Iran-China Group’s, *i.e.*, LuBian’s, Bitcoin**

72. Plaintiffs bring this action pursuant to TRIA to execute on the 127,271 Bitcoin belonging to the Iran-China Group and its LuBian mining pool in an effort to satisfy the above outstanding judgments. The Iran-China Group worked closely with the Iranian regime to establish a massive Bitcoin mining farm in Iran’s Rafsanjan Special Economic Zone to help Iran evade the comprehensive sanctions the United States has placed upon Iran for support of the terrorist atrocities detailed above. The Iran-China Group therefore acted as the “agency or instrumentality” of a “terrorist party,” TRIA § 201(a), and so its assets, which are blocked pursuant to U.S. regulations, *see* 31 C.F.R. §§ 510.211, 594.201(a)(5), are subject to execution under TRIA.

### **A. Iran Is Subject To Comprehensive U.S. Sanctions**

73. Since the Iranian Revolution in 1979, Iran has been subject to comprehensive U.S. sanctions. U.S. sanctions on Iran block Iranian government assets in the United States, ban nearly all U.S. trade with Iran, and prohibit foreign assistance and arms sales. U.S. sanctions in particular have targeted Iran’s energy sector, including foreign corporations that invest in it and entities that buy, sell, or transport Iranian oil and natural gas; Iran’s financial sector, including its Central Bank; other sectors of Iran’s economy, including shipping, construction, mining, textiles, automotive,

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12-cv-42 (D.D.C. Oct. 28, 2016); Order, Dkt. 37, *Taylor v. Islamic Republic of Iran*, No. 10-cv-844 (D.D.C. Nov. 8, 2013); Order, Dkt. 285, *Wamai v. Republic of Sudan*, No. 08-cv-1349 (D.D.C. Apr. 19, 2016); Order, Dkt. 93, *Worley v. Islamic Republic of Iran*, No. 12-cv-2069 (D.D.C. Apr. 12, 2022).

<sup>38</sup> *Roth* Suit Dkt. 43.

and manufacturing; arms trade to or from Iran; and many components of Iran’s government, such as Iran’s Supreme Leader and the Islamic Revolutionary Guard Corps (“IRGC”).<sup>39</sup>

74. In 2010, Congress increased the scope of U.S. sanctions, targeting Iran’s oil exports and other sectors of the Iranian economy. The United States provided relief from these sanctions pursuant to the Joint Comprehensive Plan of Action (“JCPOA”) in return for inspections and monitoring of Iran’s nuclear activities. In 2018, the first Trump Administration ceased participation in the JCPOA and reimposed all sanctions. The first Trump Administration pursued a “maximum pressure campaign” to intensify restrictions on the Iranian economy.<sup>40</sup> These sanctions resulted in over 100 corporations exiting the Iranian market, the taking of millions of barrels of Iranian oil off the market, and further restrictions on Iran’s financial institutions.<sup>41</sup> The second Trump Administration has since reinstated this “maximum pressure” campaign.<sup>42</sup>

#### **B. Iran Turns To Cryptocurrency Mining To Evade U.S. Sanctions**

75. Iran has long sought to evade those comprehensive sanctions. For example, Ayatollah Khamanei declared 2011 “The Year of Economic Jihad” and directed “the Iranian nation [to] focus the major portion of its efforts on the economic arena” to combat “the greed of foreigners” and “the centers of global power.”<sup>43</sup> The next year, Iranian oil minister Rostam Qasemi asserted that “[a]ll possible options have been planned in government to counter sanctions[,] and we are fully prepared to deal with them.”<sup>44</sup> After the Trump Administration instituted the first “maximum

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<sup>39</sup> See “U.S. Sanctions on Iran,” Congress.gov, <https://tinyurl.com/487ap2n8>.

<sup>40</sup> See *Maximum Pressure Campaign on the Regime in Iran*, U.S. Dep’t of State (Apr. 4, 2019), <https://tinyurl.com/438n4rtc>.

<sup>41</sup> *Id.*

<sup>42</sup> See *Fact Sheet: President Donald J. Trump Restores Maximum Pressure on Iran*, White House (Feb. 4, 2025), <https://tinyurl.com/4b28dert>; *see also* 77 Fed. Reg. 6,659, 6,659 (Feb. 5, 2012); *see also* 31 C.F.R. § 560.211 (Iran Transactions and Sanctions Regulations implementing the executive order); *id.* § 594.201(a)(5) (Global Terrorism Sanctions Regulations blocking assets of “officials, agents, or affiliates of Iran’s Islamic Revolutionary Guard Corps”).

<sup>43</sup> Sara Bazoobandi, *Populism, Jihad, and Economic Resistance: Studying the Political Discourse of Iran’s Supreme Leader*, 32 Digest of Middle East Studies, 321, 325 (2023).

<sup>44</sup> Marcus George, *Iran Pledges to Counter “Malicious” Oil Embargo*, Reuters (July 1, 2012), <https://tinyurl.com/2ck224v6>.

pressure” campaign in 2018, Iranian foreign minister Mohammad Javad Zarif boasted that “[i]f there is an art we have perfected in Iran . . . it is the art of evading sanctions.”<sup>45</sup>

76. As part of the evolution of its evasion strategy, Iran began to turn to cryptocurrency. As the Congressional Research Service explained in 2019, “the Iranian government has recognized a potential role for cryptocurrencies.”<sup>46</sup> For example, Iran uses crypto transactions to pay for imports that cannot be processed through conventional payment systems and to compensate for revenues lost due to sanctions. Iran’s regime also uses crypto to move capital out of Iran. Overall, Iran’s focus on cryptocurrency is part of a broader strategy to move away from the U.S. dollar-denominated financial system. Indeed, Iran has published an official whitepaper promoting the use of cryptocurrency to avoid sanctions: “As the newly extracted Bitcoins are not easily traceable, despite the pressure of sanctions on the country, domestic economic actors can use newly-extracted cryptocurrencies, which are preferable to exist[ing] bitcoins, on international exchanges.”<sup>47</sup>

77. Iranian leaders have openly broadcasted the nation’s turn to cryptocurrency as a method to mitigate the effects of sanctions. An official in the administration of Hassan Rouhani, who served as President of Iran from 2013 to 2021, for example, claimed in 2018 that cryptocurrency “facilitates the movement and transfer of money to any point in the world” and thus “assists us . . . under sanctions conditions.”<sup>48</sup> Another deputy minister likewise described cryptocurrency as “a tool for bypassing sanctions.” A member of the Iranian parliament, Ahmad Anarki-Mohammadi, has similarly claimed that “the use of digital currency is most efficient during

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<sup>45</sup> U.S. Sanctions Won’t Change Iran Policies Says FM, Radio Free Europe (Dec. 15, 2018), <https://tinyurl.com/5dayuvrx>.

<sup>46</sup> *Bitcoin, Blockchain, and the Energy Sector* at 16, Congressional Research Service (Aug. 9, 2019), <https://tinyurl.com/mwt2jcde>.

<sup>47</sup> Behnam Gholipour, *Official Report: Iran Could Use Cryptocurrencies to Avoid Sanctions*, Iranwire (Mar. 2, 2021), <https://tinyurl.com/ywcjazn6> (citing the Iranian Center for Presidential Center for Strategic Studies, an official arm of the office of the President of Iran).

<sup>48</sup> Alireza Daliri, *The development of cryptocurrency has been placed on the agenda of the Vice Presidency for Science and Technology*, Way2Pay (July 25, 2018), <https://tinyurl.com/4upt3srh>.

times of sanctions.”<sup>49</sup> And Mohammad Ali Dehghan, a provincial economic official for Rafsanjan, where the Iran-China Group built its crypto mine in collaboration with Iranian authorities, expressly connected cryptocurrency to Iran’s efforts to launder its energy into other commodities to circumvent sanctions. Speaking at the opening of the Iran-China Group’s mine, Dehghan claimed that Iran is “creating a form of electricity export” when it converts energy, through crypto mining, into cryptocurrency—“a solution” to U.S.-imposed sanctions.<sup>50</sup>

78. Crypto advocates within Iran have sounded the same themes. At a 2025 cryptocurrency conference in Tehran, Ehsan Mehdizadeh, founder of an Iran-based cryptocurrency exchange, said “The SWIFT payment system has been cut off for us, so perhaps cryptocurrencies and blockchain can help . . . Digital and crypto currencies are one way to get around sanctions.”<sup>51</sup>

79. The IRGC reportedly also uses Bitcoin mining to enrich itself.<sup>52</sup> Specifically, the IRGC runs its own Bitcoin mining facilities, or operates protection rackets as to established mines, to fund its operations.<sup>53</sup> Under the regime of “Supreme Leader” Ali Khamenei, the IRGC established partnerships with Chinese Bitcoin miners in Iran, including a “175-megawatt Bitcoin farm in Rafsanjan,” where the Iran-China Group operated, reaping massive profits.<sup>54</sup> Just three months ago, the Treasury Department announced sanctions against an IRGC and Ministry of Defense “shadow banking” network that evaded sanctions by laundering money “through front

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<sup>49</sup> Sanaz Mousavi, *Launch of Iran’s Largest Mining Farm in Rafsanjan with Chinese Investment*, CoinIran (Dec. 12, 2019), <https://tinyurl.com/3xu59f7r>.

<sup>50</sup> *Id.*

<sup>51</sup> T.C.A. Sharad Raghavan, *Iran looks to BRICS countries to use cryptos to help it bypass sanctions*, The Hindu (Nov. 16, 2025), <https://tinyurl.com/5bnubpxa>.

<sup>52</sup> Dalga Khatinoglu, *How Iran’s Cryptocurrency Gamble Empowers the Revolutionary Guards and Drains the State*, Middle East Forum (May 14, 2025), <https://tinyurl.com/2s3n3xtz>.

<sup>53</sup> Shahriar Kia, *Bitcoin Mining in Iran, IRGC Operations and the Power Grid Crisis*, Nat’l Council of Resistance of Iran (May 26, 2025), <https://tinyurl.com/5a3uvnhr>.

<sup>54</sup> *Id.*

companies and cryptocurrency.”<sup>55</sup> According to Treasury, the IRGC uses these funds to “support regional terrorist proxy groups and develop advanced weapons systems.”<sup>56</sup>

80. Iran also uses its oil and natural gas surplus to supply electricity for Bitcoin mining.<sup>57</sup> In around mid-2019, Iranian officials determined that they could use Bitcoin mining to indirectly export oil (and natural gas) for hard currency or imports. Indeed, in 2020, the electricity used by Iran’s Bitcoin miners translated to about 10 million barrels of crude oil.<sup>58</sup> This arrangement is not a secret but has been publicly promoted by Iranian governmental leaders.<sup>59</sup>

81. Accordingly, Iran offers a reliable supply of subsidized electricity to cryptocurrency miners at below-market energy prices.

82. Iran also has adopted a number of policies to enhance crypto mining and tighten governmental control over cryptocurrency. It has adopted regulations requiring cryptocurrency miners to obtain a license from the Ministry of Industry, Mines, and Trade; requiring miners to pay government fees and charges; and requiring that licensed Bitcoin miners sell some (or all) of their coins directly to the Central Bank of Iran.<sup>60</sup>

83. Consistent with Iran’s treatment of crypto as a new national industry, in 2019, Iran directed that crypto miners would be subject to its standard “industrial tax” of 25% of income. When crypto miners converted their crypto into foreign currency and funneled it back into the Iranian economy, however, Iran reduced the tax rate on crypto mining to zero percent. Thus, Iran directly incentivized crypto miners to join efforts with the regime in skirting sanctions.

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<sup>55</sup> Treasury Targets Financial Network Supporting Iran’s Ministry, Treasury.gov (Sept. 16, 2025), <https://tinyurl.com/2tzth5xm>.

<sup>56</sup> OFAC Targets Global Network Financing Iran’s IRGC, TRM Labs (Sep. 16, 2025), <https://tinyurl.com/26acnp6n>.

<sup>57</sup> *Id.*

<sup>58</sup> Dr. Tom Robinson, *How Iran Uses Bitcoin Mining to Evade Sanctions and “Export” Millions of Barrels of Oil*, Elliptic (May 21, 2021), <https://tinyurl.com/6fps2j5n>.

<sup>59</sup> Gholipour, *supra*, note 47.

<sup>60</sup> *Id.*

84. Simultaneously, Iran decreed that miners must obtain licenses to operate as a business, introducing a comprehensive licensing regime and “offering cheap electricity to attract investment on the condition that all mined Bitcoin be sold to Iran’s central bank.”<sup>61</sup>

85. On October 21, 2020, Eshaq Jahangiri, then-First Vice President of Iran, approved a joint proposal amending Resolution No. 58144/T55637H, mandating:

Cryptocurrencies mined based on the licenses issued in this resolution will be exchangeable *solely* for the purpose of supplying the country’s imported foreign exchange. . . . Miners must supply the first-hand cryptocurrency produced up to the authorized limit, *directly (without intermediaries)* to the channels introduced by the Central Bank of [Iran].

86. As a result of these efforts, public reports show that in 2020, Iran hosted at least 4.5% of all global Bitcoin mining and generated substantial revenue from its mining activities.

**C. The Iran-China Group Collaborates With The Iranian Government To Mine Cryptocurrency And Evade Sanctions**

87. The Iran-China Group’s establishment and operation of a large cryptocurrency mine in Rafsanjan, Iran was part and parcel of Iran’s strategy to circumvent sanctions through new cryptocurrency mining efforts.

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<sup>61</sup> Kia, *supra*, note 53.

88. The Iran-China Group was founded with the stated purpose of, *inter alia*, facilitating “cryptocurrency mining” and “blockchain technology,” as the Group openly discussed on its Instagram account:



iranchinaidg • Follow

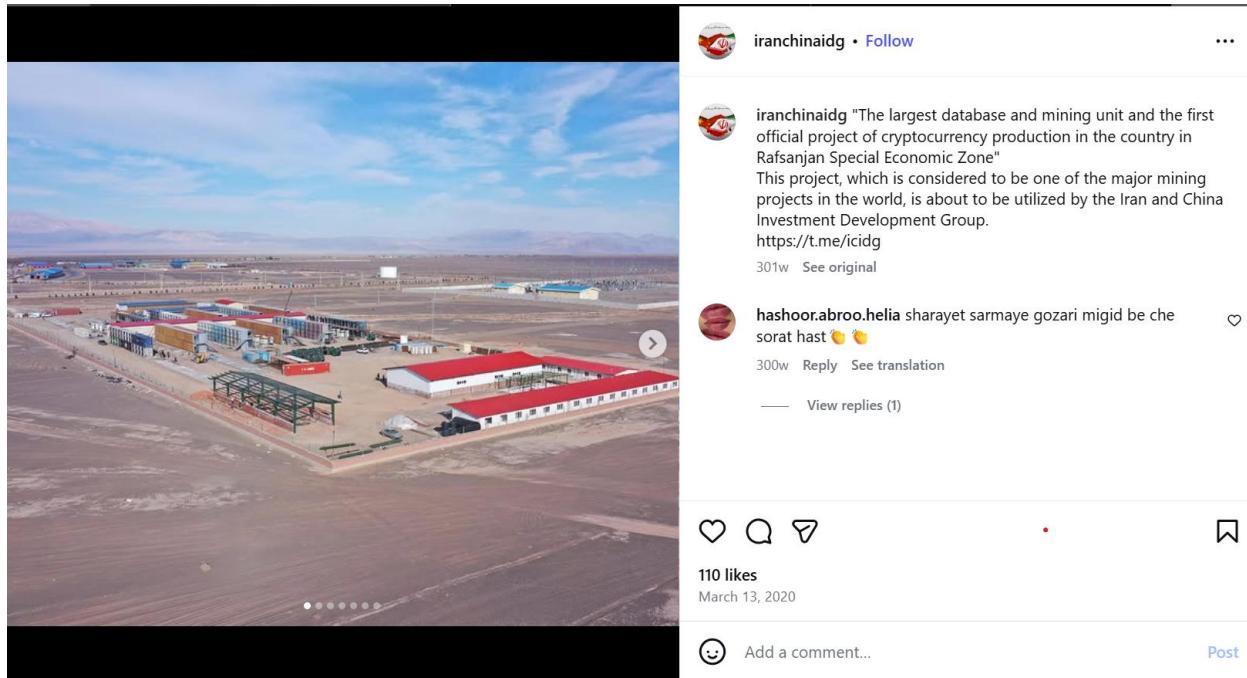
Introduction to the Iran–China Development and Investment Group

The Iran–China Development and Investment Group was established in late 1395 (2016) through the cooperation of Iranian and Chinese investors, with the aim of enhancing collaboration in the fields of industry, commerce, manufacturing, cryptocurrency mining, blockchain technology, solar power plants, data centers, and other related areas.

In addition to projects that are implemented directly by the company, another key objective of the Iran–China Development and Investment Group is to identify promising projects in Iran that face difficulties in securing initial capital. The group seeks to support the launch and development of these projects by attracting foreign investors and facilitating access to funding.

<https://t.me/icidg>  
300w See translation

89. Pursuant to that goal, beginning in early 2020, the Iran-China Group began to set up its large-scale cryptocurrency mining operation in the Rafsanjan Special Economic Zone, in partnership with the Iranian government. In another public Instagram post from March 2020, the Iran-China Group displayed a picture of the site (with construction in progress), describing it as “one of the major mining projects in the world” and “the first official project of cryptocurrency production in the country.”



90. Iran-China Group Chairman Mohammad Hassan Ranjbar described the relationship with the Iranian government as one of “mutual help.” Indeed, Iran’s cooperation was integral in setting up the Iran-China Group’s massive Bitcoin mining farm from which the LuBian mining pool ultimately operated. The site was launched with the knowledge and approval of senior Iranian officials. Iranian media reported that an adviser to President Hassan Rouhani opened the farm disguised as a “data center.” Simultaneously, media reported that an Iranian military organization was collaborating in mining at the site.<sup>62</sup>

91. Iran opened special “customs channels” and provided for ships affiliated with its state-owned shipping company, the Islamic Republic of Iran Shipping Lines, to import critical tools for the Rafsanjan mine, such as powerful “Taurus” mining machines, servers, high-voltage electric transformers, and spare parts needed for maintenance and expansion. Many of these ships

<sup>62</sup> *Bitcoin Mining in Iran Profitable Only For Chinese, Says Insider*, Iran Int’l (Apr. 11, 2021), <https://tinyurl.com/a85kdnph>.

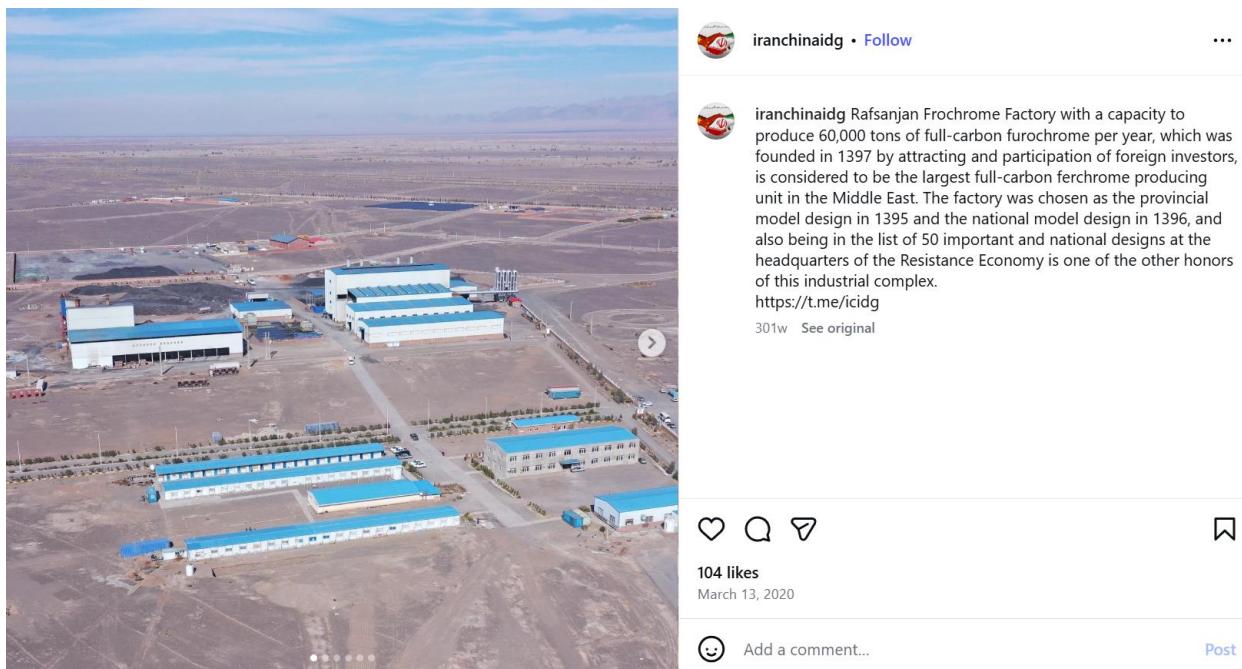
were individually sanctioned by U.S. and international authorities. Via these ships, which were linked to Iran's state-owned shipping company, multiple consignments of crypto-mining hardware were imported from China into Iran with "Iran & China Investment Development Group" or close variants listed as the consignee for the shipments, and the destination listed as the Rafsanjan Special Economic Zone. Contact numbers for these shipments also match the numbers associated with the Iran-China Group in other records.

92. Iran offered electricity to the mining site at reduced rates—a critical contribution given that Bitcoin mining requires massive amounts of electrical power. While publicly the Iran-China Group claimed to be billed at higher electricity rates, applicable to miners, and a bill attributable to the Iran-China Group from the fall of 2020 seemingly supports that at first blush, careful analysis of the bill, pictures and satellite imagery of the site, and the Rafsanjan mine's output indicates that it was likely drawing significantly cheaper power through an electric substation officially tied to the ferrochrome factory complex, also built by the Iran-China Group at the Rafsanjan site, that appears to be connected to the cryptocurrency mine, as the following satellite image shows.



93. Electricity pulled from the ferrochrome substation, which was owned by Iran (because the Iran-China Group donated it to Iran) was billed at significantly lower industrial rates. Thus, the Iran-China Group appears to have paid a full miner fee on only a portion of its electricity use, while using much cheaper electricity from the ferrochrome substation for the rest of the electricity that was needed to operate the mining farm.

94. The Iran-China Group publicly touted the ferrochrome factory and a supporting power station in its Instagram posts.



iranchnaidg • Follow ...

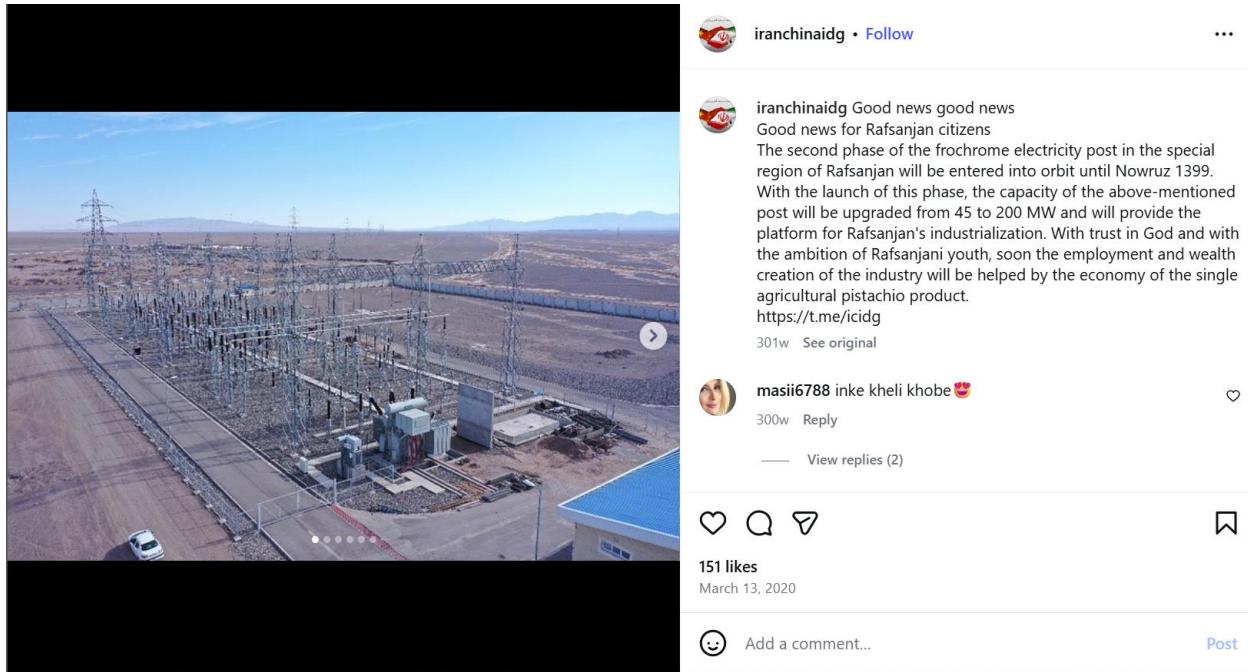
iranchnaidg Rafsanjan Ferrochrome Factory with a capacity to produce 60,000 tons of full-carbon ferrochrome per year, which was founded in 1397 by attracting and participation of foreign investors, is considered to be the largest full-carbon ferrochrome producing unit in the Middle East. The factory was chosen as the provincial model design in 1395 and the national model design in 1396, and also being in the list of 50 important and national designs at the headquarters of the Resistance Economy is one of the other honors of this industrial complex.  
<https://t.me/icidg>

301w See original

♥ Q ↗

104 likes  
March 13, 2020

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95. Highlighting the Iran-China Group's special relationship with Tavanir, Iran's state-owned power company, when Iran was experiencing widespread blackouts and cryptocurrency miners across the country were directed to cease operations, in correspondence with Tavanir, Iran-China Group Chairman Mohammad Hassan Ranjbar identified the Iran-China Group as the operator of the Rafsanjan mining farm, explained that the Iran-China Group was operating the farm pursuant to an operating license from the Iranian government, outlined the scope of the project, and requested permission to restart mining operations at the Rafsanjan site during off-peak hours.

96. The Iran-China Group's relationship with Tavanir proved fruitful in securing the necessary electrical power. The Rafsanjan facility operated using 50,000 high-powered computers built specially for mining cryptocurrency capable of drawing 175 MW of electrical power—the power equivalent to that consumed by New Orleans. Electricity billing records confirm that the “Iran-China Investment Development Group Company” was drawing massive amounts of power in Rafsanjan, in proportions that dwarf typical household or general industrial use.

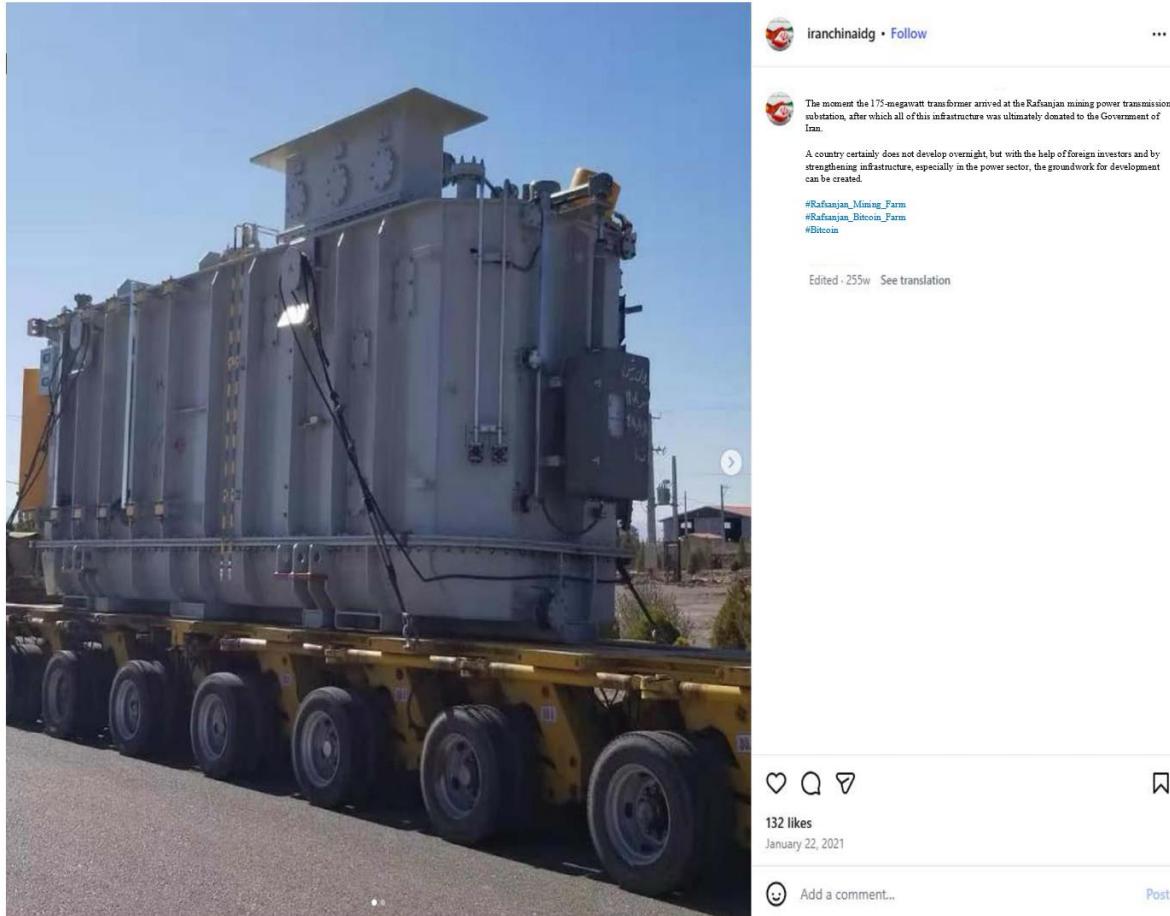
97. The result was a Bitcoin mining operation of epic proportions—indeed, one visible from space, as confirmed by satellite imagery.



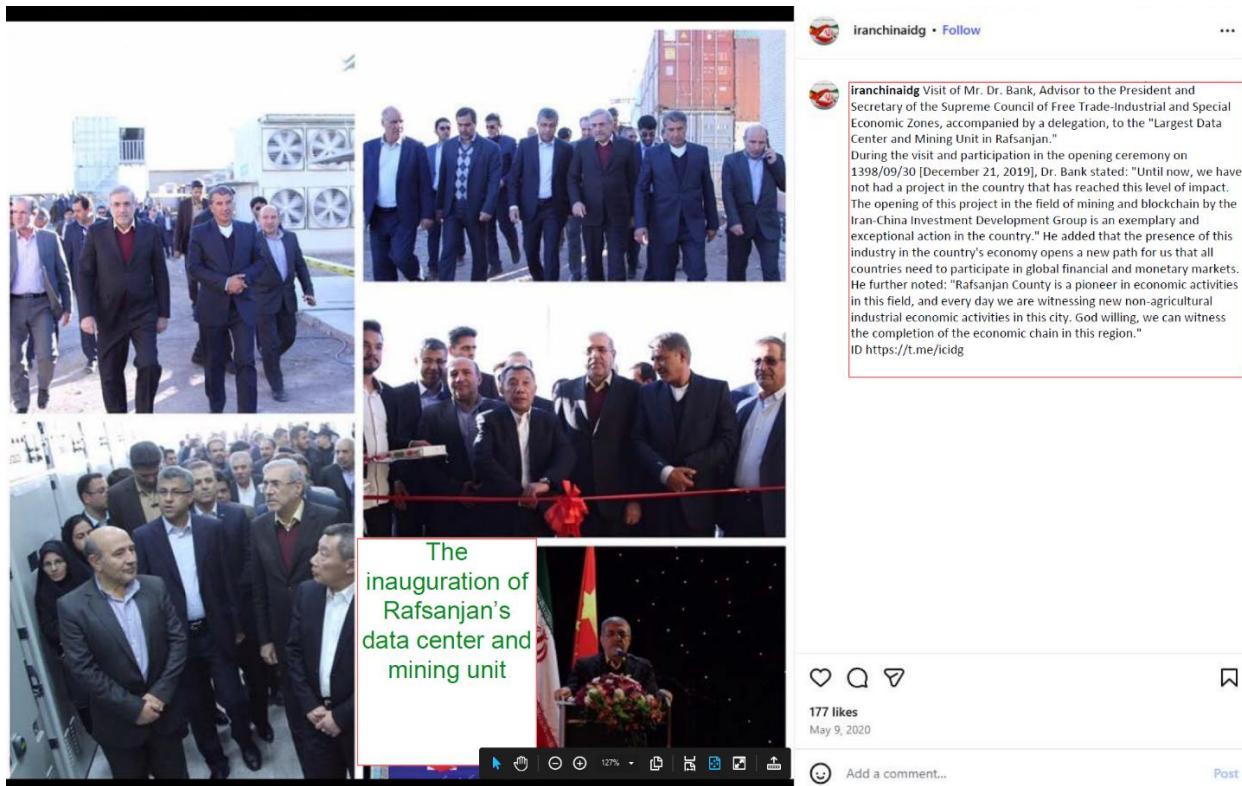
98. The Iran-China Group celebrated its crypto-mining farm through promotional media, including a video tour of a “175 MW Middle East farm.”



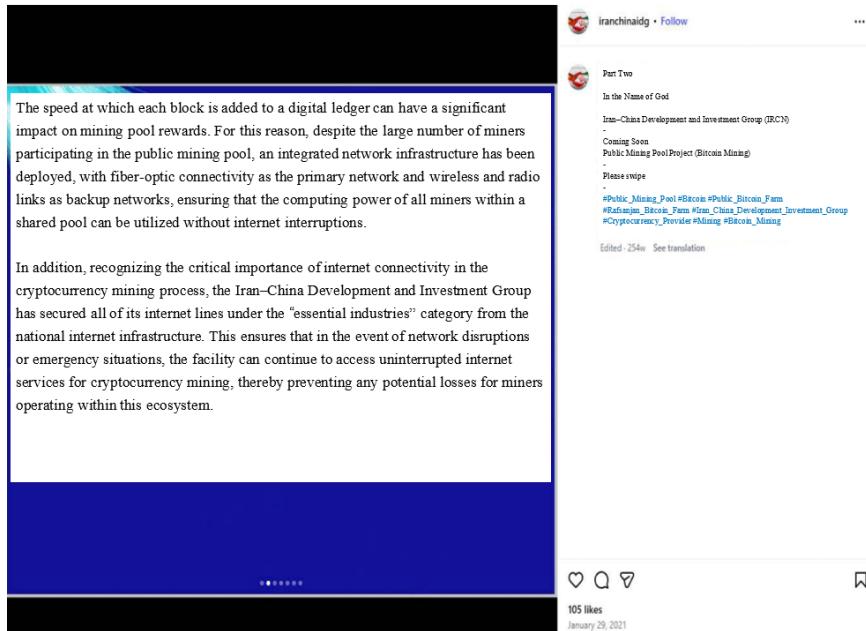
99. Underscoring its partnership with the Iranian state, after construction, the Iran-China Group gave key electrical equipment and facilities at the Rafsanjan site, including the substation for the ferrochrome factory connected to the mine and a 175-megawatt transformer, to Iran. Iran-China Group Chairman Mohammad Hassan Ranjbar recounted on a public chatroom that the company had donated “two high-voltage electricity substations,” including a “massive” transformer, “to the esteemed government of the Islamic Republic of Iran.” The Iran-China Group also made a similar post on Instagram, reproduced below, claiming in a January 22, 2021 post that it had donated a 175-megawatt transformer “to the Government of Iran.”



100. In a May 9, 2020 Instagram post, the Iran-China Group announced the opening of the Rafsanjan facility, which was attended by the Advisor to the President of Iran, Dr. Bank, accompanied by a “delegation” of officials.



101. The Iran-China Group subsequently explained in an Instagram post on January 29, 2021, that it had registered the internet connections to the Rafsanjan mine as part of Iran's "essential industries category of national internet infrastructure," allowing it to continue mining even in emergency conditions.



102. The Iran-China Group, in turn, operated a Bitcoin mining pool called “LuBian,” tagging itself as “lubian.com” in coinbase transactions.

103. A coinbase is the first transaction in a block. If a miner embeds its identifier (as LuBian did here) in a coinbase transaction, it means that miner mined the block and received the reward.

104. The computing power of the Iran-China Group’s LuBian mining pool closely matches—and indeed, uniquely aligns with—the computing power and energy consumption of the Rafsanjan site. A farm the size of the Rafsanjan site would be expected to find more than four Bitcoin “blocks” per day under typical 2020 network conditions. LuBian’s actual observed block production maps directly onto the expected block production of the Rafsanjan site.

105. Notably, LuBian’s hash rate—or mining power—also correlates with the various shipments of mining equipment that were sent to the Iran-China Group in Rafsanjan on Iran’s sanctioned state-shipping lines. LuBian had the only major, persistent hashrate that came online in the immediate time period following the shipments of miners to the Iran-China Group.

106. LuBian’s activity also closely correlates with known Iranian power outages. During Iran’s 2021 power outage, which started on January 12, for example, Rafsanjan experienced multi-hour and multi-day grid interruptions. During that same period, LuBian’s activity dropped sharply and remained at a lower, but stable, level before recovering as grid conditions improved.

107. In addition to these correlations, personnel affiliated with LuBian’s mining pool also made public statements reflecting that LuBian was operating in Iran. Chinese-language reporting and interviews from 2020 quote LuBian’s co-founder describing LuBian operating what is characterized as the largest compliant Bitcoin mining farm in Iran, having its own customs channels and strong local relationships in Iran, and having “good relations” with Iran’s Ministry of Energy, Ministry of Foreign Affairs, and even Iran’s “army.”<sup>63</sup>

108. As a result of its ties to the Iranian government, prior to the December 2020 hack, LuBian was able to mine at least 11,000 Bitcoin in Iran—which, pursuant to Iranian law, were required to be supplied in whole or part to “channels” selected by the Central Bank of Iran to facilitate Iran’s foreign imports. LuBian also accumulated at least another 116,271 Bitcoin in its wallets from other activities, bringing its total reserve as of December 2020 to 127,271 Bitcoin—worth approximately \$11.4 billion as of December 22, 2025. Like all licensed miners, LuBian was eligible for a 0% tax rate on any repatriated foreign currency earnings from its mining operations

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<sup>63</sup> Vicent He, *China-based Lubian.com Boasts the Largest Compliant Bitcoin Mining Farm in Iran*, 8btc.com (Aug. 12, 2020), <https://tinyurl.com/5f479suc>.

(“As industrial players, cryptocurrency miners are subject to taxes—that is, unless they repatriate their foreign currency yields and sell them in NIMA, an online currency system for exporters designed by the Central Bank of Iran”), or it was required to pay industrial taxes of 25% to Iran.<sup>64</sup>

#### **D. Iran’s Blocked Assets Are Within the United States**

109. Iran’s vision of developing a substantial cryptocurrency reserve to launder its domestic energy and achieve access to foreign markets was severely hampered in 2020, thanks to the efforts of an anonymous “whitehat” hacker.

110. On December 28, 2020, using sophisticated tools, that hacker breached the LuBian pool’s crypto wallets and stole over 127,000 Bitcoin. The breach went unreported for nearly five years, as the hacker never attempted to spend or exchange the Bitcoin and LuBian never publicly reported the loss. Behind the scenes, however, LuBian frantically worked to secure the return of the hacked Bitcoin. It broadcast a series of messages on the blockchain to addresses that received the stolen funds, including a message stating, “MSG from LB. To the whitehat who is saving our asset, you can contact us through 1228btc@gmail.com to discuss the return of asset and your reward.” The hacker never relented, however, and, on information and belief, eventually delivered the private keys to agents of the United States’ Federal Bureau of Investigation New York field office, where the crypto remains.

111. LuBian’s loss was publicly confirmed in 2025 when the blockchain-analysis firm Arkham Intelligence conducted a retrospective study uncovering the 127,000 BTC loss. Those stolen Bitcoin are currently worth nearly \$11.4 billion.

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<sup>64</sup> Maziar Motamed, *Heavy-Handed Regulations Run Cryptominers Out of Iran*, Bitcoin Magazine (Sep. 2, 2019), <https://tinyurl.com/3ydfeut3>; Pooya Yaghoobirad, *Iranian Crypto Mining – Legality and Regulations*, Iran Best Lawyer, <https://tinyurl.com/ych9s6bf> (last visited Dec. 18, 2025).

112. On October 14, 2025, United States filed a forfeiture action in this Court seeking to forfeit the same 127,271 Bitcoin that are the subject of Plaintiffs' Complaint.<sup>65</sup> Its request purportedly stems from a criminal investigation into money laundering and wire fraud alleged to have been committed by Chen Zhi, Prince Group, and others in the Eastern District of New York.<sup>66</sup> The United States admits that at least some of the hacked wallets were "associated with Lubian," which it describes as "a Chinese bitcoin mining operation that maintained bitcoin mining facilities across Asia, including in China and Iran," but generally minimizes or ignores LuBian's connection to Iran. Indeed, *all* of the wallets belonged to and were controlled by LuBian, because *all* of the addresses in the Government's complaint initiated the message to the whitehat hacker starting with "MSG from LB [LuBian]" and begging for the funds to be returned. *See supra* ¶ 110. The *only* way to send these messages was by signing a transaction with a wallet's private keys.

113. Accordingly, the Bitcoin are present in the United States and in the Garnishee's custody.

### **CLAIMS FOR RELIEF**

#### **FIRST COUNT**

##### **(For Attachment and Execution Pursuant to the Terrorism Risk Insurance Act)**

114. Plaintiffs incorporate herein by reference paragraphs 1 through 113, *supra*, as if fully set forth herein.

115. Plaintiffs are entitled to execute on the 127,271 Bitcoin in the Garnishee's custody. These Bitcoin are the property of an agency or instrumentality of Iran (*i.e.*, the Iran-China Group), making those Bitcoin squarely subject to execution under TRIA.

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<sup>65</sup> *U.S. v. Approximately 127,271 Bitcoin ("BTC")*, Case No. 1:25-cv-05745 (E.D.N.Y. Oct. 14, 2025), Dkt. 1.

<sup>66</sup> *Id.* ¶ 15.

116. TRIA provides that “[n]otwithstanding any other provision of law . . . in every case in which a person has obtained a judgment against a terrorist party on a claim based on an act of terrorism . . . the blocked assets of that terrorist party (including the blocked assets of any agency or instrumentality of that terrorist party) shall be subject to execution or attachment in the aid of execution in order to satisfy such judgment to the extent of any compensatory damages for which such terrorist party has been adjudged liable.” TRIA § 201(a). “Blocked assets” refers to “any asset *seized or frozen by the United States*” pursuant to either of two statutes: the Trading with the Enemy Act (TWEA) or the International Emergency Economic Powers Act (IEEPA). TRIA § 201(d)(2)(A) (emphases added); *see Havlisch*, 152 F.4th at 364 & n.137.

117. Plaintiffs satisfy every element required under TRIA.

118. *Terrorist Party.* Iran has been designated a state sponsor of terrorism pursuant to Section 6(j) of the Export Administration Act of 1979, 50 U.S.C. App. § 2405(j), beginning January 19, 1984, and therefore is a “terrorist party” as defined by TRIA, § 201(a).

119. *Obtained Judgments.* As described above, Plaintiffs hold judgments for compensatory damages against Iran based on an act of terrorism under 28 U.S.C. § 1605A.

120. *Blocked Assets.* In Executive Order 13,599, the President invoked his IEEPA authority and “blocked” “[a]ll property and interests in property of the Government of Iran, including the Central Bank of Iran, that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person, including any foreign branch.” 77 Fed. Reg. at 6,659. That blocking has subsequently been codified into regulations. 31 C.F.R. §§ 510.211, 594.201(a)(5). As a result, as the Second Circuit has recognized, property of Iran or its agencies and instrumentalities necessarily is “blocked” property under TRIA. *See Levinson v. Kuwait Finance House (Malaysia) Berhad*, 44

F.4th 91, 98 n.6 (2d Cir. 2022) (“[A]ny property belonging to the Government of Iran (as well as its agencies or instrumentalities) under the relevant executive orders is ‘blocked’ within the meaning of TRIA.”). Thus, the Bitcoin at issue constitute “blocked” assets that have been “seized or frozen by the United States.” TRIA § 201(d)(2)(A).

121. *Agency or Instrumentality.* Finally, the Iran-China Group, doing business as LuBian, functioned as an Iranian agency or instrumentality. TRIA’s “agency or instrumentality” clause “reaches more broadly” than the corresponding one in the FSIA. *Kirschenbaum*, 830 F.3d at 133. An entity qualifies as an “agency or instrumentality of [a] terrorist party” if it “(1) was a means through which a material function of the terrorist party is accomplished, (2) provided material services to, on behalf of, or in support of the terrorist party, or (3) was owned, controlled, or directed by the terrorist party.” *Id.* at 135. The Iran-China Group is an agency or instrumentality of Iran under all three theories, each of which serves as an independent basis for attachment of the Iran-China Group’s assets under TRIA.

122. The Iran-China Group, doing business as Lubian.com was the “means through which” Iran accomplishes the “material function” of skirting international sanctions through the acquisition and use of cryptocurrency. *Kirschenbaum*, 830 F.3d at 135. It also provided “material services” to Iran by turning Iran’s natural resources into cryptocurrency that can be converted to fiat currency for Iran’s purposes. *Id.* The Second Circuit has cited “financial [and] technological support” as evidence supporting these theories of agency. *Id.* n.19. The Iran-China Group provided both forms of material support to Iran by running the large-scale mining operation at Rafsanjan in partnership with the Iranian government. Finally, the Iran-China Group’s activities—when it could operate, how much power it could use, and where the cryptocurrency it mined for Iran must be delivered—were directed by Iran.

123. Pursuant to TRIA § 201(a), Plaintiffs respectfully request that the Court enforce Plaintiffs' judgments against Iran by issuing a writ of execution against the 127,271 Bitcoin, and all interests of Iran and its "agency or instrumentality," the Iran-China Group, in the Bitcoin, and enter an order conveying, assigning, and directing the payment of the 127,271 Bitcoin to Plaintiffs, along with all rights, title, and interest of Iran and the Iran-China Group in the 127,271 Bitcoin.

## **SECOND COUNT**

### **(For Turnover Pursuant to CPLR 5225(b), 5227)**

124. Plaintiffs incorporate herein by reference paragraphs 1 through 113, *supra*, as if fully set forth herein.

125. Section 5225(b) of the CPLR states, in relevant part, that a court "shall require a . . . person in possession or custody of money . . . in which the judgment debtor has an interest or . . . a person who is a transferee of money . . . from the judgment debtor . . . to pay the money, or so much of it as is sufficient to satisfy the judgment, to the judgment creditor."

126. Section 5227 of the CPLR states, in relevant part, that a court may require "any person who it is shown is or will become indebted to the judgment debtor . . . to pay to the judgment creditor the debt upon maturity, or so much of it as is sufficient to satisfy the judgment . . . or it may direct that a judgment be entered against such person in favor of the judgment creditor."

127. Pursuant to Rule 69(a) of the Federal Rules of Civil Procedure and CPLR 5225(b) and 5227, Plaintiffs respectfully request that the Court enforce Plaintiffs' judgments against Iran by issuing an order conveying, assigning, and directing the payment to Plaintiffs of all rights, title, and interest of Iran, and its agency or instrumentality, the Iran-China Group, in the 127,271 Bitcoin previously held by the Iran-China Group, doing business as LuBian, and now in possession of

Garnishee the United States, or so much of that Bitcoin that may ultimately be necessary to satisfy Plaintiffs' outstanding judgments.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request that this Court:

- A. Find Iran-China Group acted as Iran's agency or instrumentality under TRIA, (b) that the Iran-China Group operated as "Lubian.com" for purposes of cryptocurrency transactions, and (c) that the Iran-China Group doing business as Lubian.com has an ownership interest in the 127,271 Bitcoin, and thus by extension so does Iran;
- B. Enter a writ of attachment against the 127,271 Bitcoin and the Iran-China Group's and Iran's interests in them;
- C. Enter a writ of execution against the 127,271 Bitcoin;
- D. Enter an order directing Garnishee the United States to turn over the 127,271 Bitcoin currently within its possession, up to the amount of Plaintiffs' judgments, including interest, against Judgment Debtor; and
- E. Award Plaintiffs other and further relief the Court deems just and proper.

Dated: December 26, 2025  
New York, New York

Respectfully submitted,

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