

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	
-v.-	:	DECLARATION IN SUPPORT OF
	:	<u>FINAL ORDER OF FORFEITURE</u>
REGINALD D. FOWLER,	:	S3 19 Cr. 254 (ALC)
	:	
Defendant.	:	
	:	
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Sebastian Swett, pursuant to Title 28, United States Code, Section 1746, declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York, and attorney for the Government herein. I am responsible for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this proceeding. This declaration is submitted in support of the Government’s submission for the entry of a Final Order of Forfeiture in the above-captioned case.

2. On or about June 29, 2023, the Court entered an Amended Preliminary Order of Forfeiture as to Money Judgment/Specific Property (the “Preliminary Order of Forfeiture”) (D.E. 146) with respect to REGINALD D. FOWLER (the “Defendant”), imposing a money judgment in the amount of \$740,249,140.52 in United States currency against the Defendant, and forfeiting to the United States all right, title and interest of the Defendant, *inter alia*, in the following specific property:

- a. \$60,157,955.15 in United States currency, formerly on deposit at HSBC Securities USA/Pershing LLC in Account No.: HMB861668, held in the name of Reginald D. Fowler;

- b. \$5,917,512.06 in United States currency, formerly on deposit at HSBC Bank US, in Account No.: 0141000147, held in the name of Global Trading Solutions, LLC;
- c. \$100,000.00 in United States currency, formerly on deposit in HSBC Bank USA Account No.: 0141000201, held in the name of Spiral Global Corporation, LLC;
- d. \$3,057.71 in United States currency, formerly on deposit in HSBC Bank USA Account No.: 0697690393, held in the name of Reginald Dennis Fowler;
- e. \$2,324.24 in United States currency, formerly on deposit at HSBC Bank USA in Account No.: 0697825922, held in the name of Reginald Dennis Fowler;
- f. \$2,003,667.79 formerly on deposit in HSBC Securities USA/Pershing LLC account HMB878886, held by Global Trading Solutions LLC;
- g. Any and All funds held at Canadian Imperial Bank of Commerce, in account CC001006882 5108411, held in the name of GTS - Canada Corporation;
- h. Any and All funds held at Canadian Imperial Bank of Commerce, in account CC001006882 0374016, held in the name of GTS - Canada Corporation;
- i. Any and All funds held at Santander UK PLC Bank; in account 00080753, held in the name of Global Management Solutions Ltd.;
- j. Any and All funds held at Santander UK PLC Bank; in account 10379431, held in the name of Global Management Group Ltd.;
- k. Any and All funds held at Santander UK PLC Bank; in account 10446319, held in the name of CIA Technology Global Ltd.; and
- l. Any and All funds held at Santander UK PLC Bank; in account 10446322, held in the name of CIA Technology Global Ltd.

(the “Specific Property”).¹

¹ The Preliminary Order of Forfeiture listed additional bank accounts, however, the Government has determined that those accounts were closed or had insufficient balances to seek a final order of forfeiture.

3. The Notice of Forfeiture and the intent of the Government to dispose of the Specific Property was posted on an official government internet site (www.forfeiture.gov) beginning on November 16, 2023, for thirty (30) consecutive days, through December 15, 2023, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court April 10, 2024 (D.E. 159).

4. On or about November 28, 2023, Notice of the Preliminary Order of Forfeiture was notice of the Preliminary Order of Forfeiture was emailed to the following:

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(the “Noticed Parties”).

5. Since final publication of the Notice of Forfeiture, thirty (30) days have expired and no petitions or claims to contest the forfeiture of the Specific Property have been filed.

6. The Defendant and the Noticed Parties are the only individuals and/or entities known by the Government to have a potential interest in the Specific Property.

7. Accordingly, the Government requests that the Court enter the proposed Final Order of Forfeiture.

8. No previous application for the relief requested herein has been sought.

Dated: New York, New York
April 15, 2024

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By:



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