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Assistant United States Attorney
Assistant United States Attorney
Chief, Asset Forfeiture Section
   Federal Courthouse, 14th Floor
   Los Angeles, California 90012
   E-mail: Steven.Welk@usdoj.gov
                 United States District Court
           FOR THE CENTRAL DISTRICT OF CALIFORNIA
                       WESTERN DIVISION
                                     VERIFIED COMPLAINT FOR
                                     FORFEITURE
                                     [18 U.S.C. § 981(a)(1)(A) and
                                     (C)]
                                     [F.B.I.]
specifically below, the United States of America alleges:
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THOMAS P. O'BRIEN

CHRISTINE C. EWELL

STEVEN R. WELK

United States Attorney

Chief, Criminal Division

California Bar No. 149883

Attorneys for Plaintiff

United States of America

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UNITED STATES OF AMERICA,

\$1,802,651.56 IN FUNDS

SEIZED FROM E-BULLION; AND

ITEMS OF PERSONAL PROPERTY SEIZED FROM GOLDFINGER COIN & BULLION, INC.,

\$5,017,021.50 and VARIOUS

For its claim against the defendant assets, described more

Defendants.

Plaintiff,

v.

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## JURISDICTION AND VENUE

- This is a civil forfeiture action brought pursuant to
   U.S.C. § 981(a).
- 2. This court has jurisdiction under 28 U.S.C. §§ 1345 and 1355.
- 3. Venue lies in this district pursuant to 28 U.S.C. § 1395(b).

#### PERSONS AND ENTITIES

- 4. The plaintiff in this action is the United States of America.
  - 5. The defendants are:
- a. \$1,802,651.56 seized on May 11, 2006 from an account held by e-Bullion, Inc. ("e-Bullion") in the name or for the benefit of Kum Ventures, Inc. (aka Kum Holdings). E-Bullion was affiliated with or under common control with Goldfinger Coin and Bullion, Inc. ("GCB") and Goldfinger Bullion Reserve Corporation ("GBRC") (these latter entities, together with the individual who controlled them [James Michael Fayed], are sometimes referred to collectively herein as "Goldfinger").
- b. \$1,894,559.69 seized on August 12, 2008 from Bank of America ("BofA") account no XXXXX-X7358 in the name of GCB, for which James Michael Fayed ("Fayed") had signature authority.

23 ("BofA 7358").1

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 $<sup>^{\</sup>scriptscriptstyle 1}$  The full account numbers have been redacted pursuant to Local Rule 79-5.4.

- c. \$8,715.62 seized on August 14, 2008 from BofA account no XXXXX-X7356 in the name GCB, for which Fayed had signature authority. ("BofA 7356").
- d. \$37,303.36 seized on August 14, 2008 from Wells Fargo Bank ("WFB") account no XXX-XXX5942 in the name of GCB, for which Fayed had signature authority. ("WFB 5942").
- e. \$70,810.88 seized on August 14, 2008 from WFB account no XXX-XXX3735 in the name of GCB, for which Fayed had signature authority. ("WFB 3735").
- f \$560,680.07 seized on August 14, 2008 from BofA account no XXXXX-X1905 in the name of GCB, for which Fayed had signature authority. ("BofA 1905").
- g. \$2,279,111.69 seized on August 14, 2008 from BofA account no XXXXX-X9713 in the name of GCB, for which Fayed had signature authority. ("BofA 9713").
- h. \$165,840.19 seized on September 11, 2008 from BofA account no XXXXX-X7355 in the name of GCB, for which Fayed had signature authority. ("BofA 7355").
- i. the currency and items of personal property seized from Goldfinger listed in exhibit A (which is hereby incorporated by reference as though set forth in full at this point), seized pursuant to federal search warrants in August 2008.
- 6. The defendants were seized in this district on the dates indicated above by Special Agents of the Federal Bureau of Investigation ("FBI") and Internal Revenue Service ("IRS"). The defendants are presently in the custody of the United States

- Marshals Service and the FBI, where they will remain subject to the court's jurisdiction during the pendency of this action.
- 7. GCB is a Delaware Corporation incorporated in or about 2001. Fayed is the president and treasurer; Pamela Fayed (Fayed's spouse, who was killed in 2008 in an ambush murder for which Fayed has been charged) was the vice-president and secretary.
- 8. GBRC is a Delaware Corporation which was incorporated on February 23, 2001. Fayed is the president and treasurer;
  Pamela Fayed was the vice-president and secretary.
- 9. E-Bullion was an online service that offered, among other things, to transfer money for a fee. It operated from a website called called <a href="www.e-Bullion.com">www.e-Bullion.com</a>, as well as from offices at 1330 Flynn Road, Camarillo, California. The website represented that "The e-Bullion Company is a Panama Corporation wholly owned by Goldfinger Bullion Reserve Corporation."
- 10. The defendants were seized from GCB, GBRC and/or its primary owner/operator, Fayed. The interests of GCB, GBRC, Fayed and Kum Ventures may be affected by these proceedings. On February 26, 2008, a federal grand jury in this district indicted Fayed and GCB (case no. 08-00224-PSG) for violation of 18 U.S.C. Section 1960.

### LEGAL BASES FOR FORFEITURE

11. Based upon the facts set out herein, plaintiff alleges that the defendants are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C) on the

grounds that: (a) the defendants were involved in multiple violations of 18 U.S.C. § 1960 (operation of an unlicensed money transmitting business), and are therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A); (b) the defendants represent or are traceable to proceeds of multiple violations of 18 U.S.C. § 1343 (wire fraud) and/or § 1341 (mail fraud), and are therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C); and (c) the defendants were involved in multiple transactions in violation of 18 U.S.C. § 1956(a)(1)(A) (promotion money laundering), (a)(1)(B) (concealment money laundering), (a)(2) (international transfer of funds to promote specified unlawful activity), and 18 U.S.C. § 1957, and are therefore subject to forfeiture pursuant to 18 U.S.C. § 981 (a)(1)(A).

## FACTS SUPPORTING FORFEITURE

## The Illegal Money Transmitting Business

12. Title 18, United States Code, Section 1960 makes it a crime to knowingly conduct, control, manage, supervise, direct or own all or part of an unlicensed money transmitting business. An unlicensed money transmitting business is defined as one which affects interstate or foreign commerce in any manner or degree and (a) is operated without an appropriate license in a state, such as California, where such operation is punishable under state law; (b) is not in compliance with the money transmitting business registration requirements under 31 U.S.C. § 5330, or the regulations promulgated thereunder; or (c) otherwise involves the transportation or transmission of funds that are known by the

- transmitter to have been derived from a criminal offense or are intended to be used to promote or support unlawful activity.
- 13. Money transmitting is defined as transferring funds on behalf of the public by any and all means, including transfers within the U.S. or internationally by wire, check, facsimile or courier.
- 14. The e-Bullion website described its "e-currency" as "an electronic currency that is tied directly to a particular national currency (e.g. U.S. Dollars), and the value does not fluctuate with spot metal prices."
- 15. GCB handled the funds for e-Bullion through its bank accounts, including some of the accounts from which portions of the defendant funds were seized. According to the website for GCB (<a href="www.goldfingercoin.com">www.goldfingercoin.com</a>), "Goldfinger Coin & Bullion Sales provides a service to allow electronic purchases of Bullion (precious metals) for funding your e-currency account."
- 16. GCB, GBRC, e-Bullion, Fayed and others working in concert with them held and controlled numerous domestic bank accounts, and engaged in multiple monetary and financial transactions on behalf of members of the public affecting interstate commerce, in violation of § 1960. In addition, they knowingly facilitated and participated in the interstate and international receipt and transfer of millions of dollars in funds from schemes which they knew to be fraudulent, with the intent to promote illegal activity and conceal the

nature, source, location, control and ownership of proceeds of unlawful activity, in violation of 18 U.S.C. §§ 1956 and 1957.

E-Bullion and Goldfinger provided money transmitting and purported investment services and products to the public. All of the services offered by e-Bullion and Goldfinger involved money transmission. Some services were purportedly solely for investment in precious metals, while others were purportedly solely for "investment" in non-precious metal products. government alleges on information and belief that the monies transferred by the public to e-Bullion and Goldfinger were commingled by Fayed and others acting in concert with them without regard to the intended purpose of the transferors. Moreover, Fayed and others knowingly accepted proceeds of fraud schemes through e-Bullion and Goldfinger and commingled funds with fraud proceeds through, among other things, multiple transfers among domestic bank accounts. The items listed in exhibit A were involved in these transfers and are alleged to represent or be traceable to funds involved in the illegal money transmitting business.

18. On the website for e-Bullion.com, the following representations were set out:

e-Bullion is instant, real-time currency for international commerce. In just minutes, you can send and receive irrevocable payments from anyone, anywhere on the globe! e-Bullion is the true global currency for a global world economy. It has unlimited potential and is as fluid and flexible as your imagination.

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The e-Bullion.com web site further represented

True "global currency" is here at last. Now you can put the world at your fingertips with your new e-Bullion Debit Card! It takes just a few minutes to complete the simple online application. Click here to apply for your card now. (Requires e-Bullion Account sign in).

Your new e-Bullion debit card will allow you to leverage ATM & Point of Sale (POS) money systems anywhere in the world! Your card will work with Plus, Star, Pulse, Interlink, NYCE and Mac.

"ANONYMOUS & NUMBERED" A numbered only debit card increases your security. (Branded Visa cards will be available in the near future.)

- 19. In February 2006, Fayed was interviewed by the FBI concerning Goldfinger, and asked specifically whether e-Bullion was a money transmitter, which would require it to be licensed in order to operate pursuant to 18 U.S.C. § 1960 and California law. Fayed did not claim that he and the businesses he operated were not money transmitting businesses, but that he was exempt from applicable licensing requirements because he had received a letter from the U.S. Treasury Department which stated that precious metals businesses were not money transmitters subject to licensing.
- 20. The government does not send the sort of letters claimed to have been received by Fayed from the Treasury Department, and there is no such record that a letter was provided to him either by the IRS or the U.S. Treasury Department.
- 21. In April 2006, the State of California Department of Financial Institutions confirmed that neither Fayed, GCB, GBRC, nor e-Bullion.com had ever been licensed to transmit money, nor

were any of them approved as agents of a licensed money transmitting business in California.

- 22. In May 2008, the IRS certified that neither GCB, GBRC, e-Bullion, James Fayed nor Pamela Fayed had ever been registered or authorized to function as a money transmitting business.
- 23. Nevertheless, beginning at a time unknown and continuing through August 2008, Fayed and the Goldfinger entities knowingly conducted, controlled, managed, supervised, directed and owned an unlicensed money transmitting business affecting interstate and foreign commerce: (a) having failed to obtain an appropriate money transmitting license under California Finance Code §§ 1800.3(a) and 1823; (b) having failed to comply with the money transmitting business registration requirements under 31 U.S.C. § 5330, and the regulations prescribed thereunder; and (c) knowingly transporting or transmitting funds derived from a criminal offense or which were intended to be used to promote or support unlawful activity.
- 24. GCB Wells Fargo account XXX-XXX4976 ("WFB 4976") was the principal WFB account receiving outside deposits for GCB. The deposits into the account were generally small in nature, with many being for less than \$100, or just a few hundred dollars. There are some deposits over \$1,000, and a few of up to \$10,000. This account was used primarily as a pass-through account, with the vast majority of the deposits being subsequently transferred to WFB account 5942, from which a portion of the defendant funds were seized. Of the approximately

\$5,000,000 in withdrawals/debits during the period of analysis, approximately \$5,000,000 was transferred to WFB 5942.

- 25. Similar activity is observed in records for Goldfinger BofA account number XXXX-X-X4328 ("BofA 4328"), which was funded in part with cash deposits for which the depositors generally were not identified. Like some of the deposits into WFB 4976, many of the cash deposits into BofA 4328 were made via Western Union, MoneyGram, or through Postal Money orders, and offered no information about the source of the funds.
- 26. Of the approximately \$5,000,000 in deposits into WFB 5942, \$3.4 million was subsequently transferred to Palm Desert National Bank for the purchase and loading of cash value cards by the Royal Bank of Scotland Cash Lynk program. Cash Lynk issues ATM-like access cards known as Cash Lynk cards which function like debit cards, but need not bear the true name of the holder. Approximately \$500,000 was wired from WFB 5942 internationally. Approximately \$400,000 more was transferred to GCB BofA account XXXXX-X7357 ("BofA 7357").
- 27. Numerous Cash Lynk cards were acquired by Goldfinger for its clients bearing no identifying information relating to the purchasers or owners. In many instances, the Cash Lynk cards acquired and distributed by Goldfinger bore only the words "CashLynk" and the account number.
- 33. An analysis of Lynk Systems records revealed that more than \$33,594,934 worth of "value-loaded" cards, which allow withdrawal of funds from ATMs around the world, were issued by

Lynk Systems on behalf of Goldfinger. The following is a sampling of Lynk Systems cards issued to GCB customers with corresponding ATM withdrawals:

<u>First Name</u>	<u>Last Name</u>	Amount Withdrawn
Freedom	Mountain	\$109,995
Flight Plan	1000	\$218,636
Travel	Cash	\$195,304
DBS	DBS	\$10,443
D	Golfer	\$ 11,500
KC	Gun	\$149,007
Null	Null	\$995,048
Payday	Profits	\$41,858
J	Pul	\$50,046
Roop	Rupi	\$58,756
Global	Synthesis	\$19,534
USZ-3	USZ-3	\$113,858
New World	Technology	\$397,118
CPI	XXX	\$14,725
Total	:	\$ 2,385,828

28. The fund transfers among Goldfinger accounts were intended to conceal or disguise the nature, source, location, control and ownership of the monies used to fund the accounts, much of which appear to have been proceeds of mail or wire fraud. Indeed, some of the activity in the Goldfinger accounts appears to have been intended solely to accomplish such concealment.

29. BofA 7357 acted as a deposit account, which was immediately "swept" to BofA 7358. During 2007 and early 2008, BofA 7356 (see ¶5(c)) was funded entirely from BofA 7358 (see ¶5(b)). Money was then wire-transferred out of BofA 7356 in large amounts, usually around \$100,000 to \$200,000. Monthly credits to BofA 7356 during that time were \$3,000,000 to \$4,000,000. Monthly debits to the account tended to equal the amount of deposits, and appeared to be in the form of checks written to Goldfinger customers throughout the United States. In June 2007, 1260 checks were written on BofA 7356. The transfers of funds into BofA 7356 from BofA 7358 were usually large (\$42,418 to \$330,549), and occurred almost daily.

- 30. BofA 7358 was also used to fund WFB account 3735, which received approximately \$300,000 in transfers from BofA 7358.

  Approximately \$300,000 from WFB 3735 was paid to Paychex, a payroll service.
- 31. BofA 7358 was also used to fund BofA 9713, from which a portion of the defendant funds was seized. BofA 9713 was funded by and used to fund other Goldfinger accounts. There were numerous electronic transfers between BofA 9713 and BofA 7358. The transfers were usually large (between \$100,000 and \$985,000) and there were relatively few per month for example, during June 2007, there were only five. Between March 13 and April 22, 2008, the activity in BofA 9713 consisted entirely of online banking transfers among this account, BofA 7358 and BofA 1905. The transfers were usually large (\$66,500 to \$965,000). Only two

online banking transfers were credited to the account in March 2008 (both from BofA 7358), and one online banking transfer was debited in April 2008 (to BofA 1905).

- 32. BofA 7358 was also used to fund BofA 1905, from which a portion of the defendant funds was seized. BofA 1905 also received funds from BofA 9713. The debits from BofA 1905 were paid to American Express and Chase, listing James M. Fayed as the beneficiary.
- 33. From January 2005 through February 2008, BofA 7355, from which a portion of the defendant funds was seized (see ¶5(h)), was funded with approximately \$6.7 million in transfers from BofA 7358, which funds were then transferred back to BofA 7358. There were from one to fifteen transfers between the two accounts per month, and this was essentially the only activity in this account.

## e-Bullion and Kum Ventures

34. From about October 2005 through about January 2006, more than 1,000 victims from around the world were induced to invest in a Ponzi scheme identified as Kum Ventures Inc., which collected total "investments" of approximately \$12,000,000. These victims were solicited to invest in Kum Ventures through High Yield Investment Program ("HYIP") "chat rooms" on the Internet. Investors were falsely advised that they would receive weekly returns of 10%, and that Kum Ventures had been paying this return to investors for several years.

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- 35. Victims of the Kum Ventures Ponzi scheme were directed by scheme promoters and an Internet newsletter entitled <a href="mailto:newsletter@kum-holdings.com">newsletter@kum-holdings.com</a> to invest in Kum Ventures by depositing money into accounts at either Bank of America or Wells Fargo Bank, and requesting that the funds be wire-transferred to GCB accounts at those banks. Once the wire transfers to GCB were completed, the investors would receive, via the Internet, a confirmation that the money had been successfully transferred to GCB and ostensibly held for the benefit of Kum Ventures.
- that Fayed was an authorized signor for the GCB accounts into which the funds of the Kum Ventures investors were transferred. Those records further reflect that approximately \$12,000,000 of Kum Ventures investor funds were transferred to GCB bank accounts. Those funds were then moved through other GCB accounts and commingled with other funds. Ultimately, \$6,000,000 of the commingled funds were wire-transferred to the First Curacao International Bank N.V. account of Kum Ventures, located in the Netherlands Antilles, usually in amounts of several hundred thousand dollars each. Banks located in the Netherlands Antilles and similar "offshore" banking facilities are havens for fraud and money laundering.
- 37. According to records for WFB 4976, between August 2005 and April 2006, there were 1,214 transactions in this account, including approximately \$2,778,000 worth of cash deposits. Many

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of the 1,214 cash transactions did not identify the depositor.

Numerous deposits were made through Western Union and Money Gram.

- "returns" on their investments, those returns were actually paid with funds provided by other, subsequent investors, and were made in order to lull the paid investors and create the appearance of promised investment returns. Those payments ceased in or about January 2006 and most, if not all of the investors lost the entire balance of their principal investments.
- 39. Victim interviews confirmed that victims wiretransferred monies directly into BofA 7357, which was a "swept"
  account, meaning that account funds were swept regularly from the
  account to BofA 7358. Kum Ventures victims transferred money to
  BofA 7357 for the sole purpose of investing in Kum Ventures, and
  never intended to engage in any financial transaction related to
  gold or precious metals, nor to otherwise use any service offered
  by e-Bullion or GCB.
- 40. Numerous Kum Ventures-related wire transfers were received into BofA 7357 and then transferred into BofA 7358. As noted above, substantial amounts were wire-transferred from BofA 7358 to an account of persons believed to be the Ponzi operators of Kum Ventures at the First Curacao International Bank in the Netherlands Antilles. Below are some examples of the wire transfers of funds from BofA 7358 to First Curacao:

October 31, 2005:

\$155,000

November 2, 2005:

\$155,000

November 3, 2005: \$300,000 November 14, 2005: \$350,000 \$300,000 November 16, 2005: \$350,000 November 28, 2005: December 5, 2005: \$600,000 \$550,000 January 18, 2006: \$450,000 January 23, 2006: \$350,000 January 31, 2006: 

- 41. Other investors transferred funds directly into WFB 4976. These individuals appear not to have intended to engage in any financial transaction related to gold or precious metals, or to otherwise use any service offered by e-Bullion or GCB. At least one investor who transferred money into WFB 4976 received a "return" paid out of BofA 7356.
- 42. Based upon documentary evidence seized from Goldfinger and a storage locker rented by Pamela Fayed, plaintiff alleges that Fayed had actual knowledge that Kum Ventures was a fraudulent scheme, and that Fayed knowingly used e-Bullion, the Goldfinger entities and the bank accounts of those entities to facilitate and promote the fraud through, among other things, receipt of investor monies, transfer of those monies among Goldfinger accounts, which was also intended to conceal or disguise their nature, source, location, ownership and control, and the international transfer of those monies.

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# e-Bullion and Solid Investements

43. In or about October 2006, the FBI opened an investigation into a similar Ponzi scheme known as "Solid Investments." Like victims of the Kum Ventures scheme, Solid Investments victims were directed by scheme promoters to transfer funds into Goldfinger accounts. Further investigation revealed that approximately 980 investors transferred approximately \$11,900,000 into Goldfinger accounts in connection with the Solid Investments scheme between January and April 2006. Actual losses to investors in the Solid Investments fraud scheme is believed to exceed \$4,000,000.

#### FIRST CAUSE OF ACTION

## (18 U.S.C. § 981(a)(1)(A)

44. Based upon the facts set out herein, plaintiff alleges that the defendants, and each of them, are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) on the ground that the defendants were involved in multiple violations of 18 U.S.C. § 1960 (operation of an unlicensed money transmitting business).

## SECOND CAUSE OF ACTION

## (18 U.S.C. § 981(a)(1)(C))

45. Based upon the facts set out herein, plaintiff alleges that the defendants, and each of them, are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) on the ground that the defendants represent or are traceable to proceeds

of multiple violations of 18 U.S.C. § 1343 (wire fraud) and/or § 1341 (mail fraud).

THIRD CAUSE OF ACTION

(18 U.S.C. § 981(a)(1)(A))

46. Based upon the facts set out herein, plaintiff alleges that the defendants, and each of them, are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) on the grounds that the defendants were involved in multiple transactions in violation of 18 U.S.C. § 1956(a)(1)(A) (promotion money laundering), (a)(1)(B) (concealment money laundering), (a)(2) (international transfer of funds to promote specified unlawful activity), and 18 U.S.C. § 1957.

WHEREFORE, the United States prays that:

- a. due process issue to enforce the forfeiture of the defendants;
- b. due notice be given to all interested parties to appear and show cause why forfeiture should not be decreed;
- c. judgment be entered declaring that the defendants are forfeited to the United States of America for disposition according to law;
- d. the United States be awarded all costs, expenses and disbursements; and

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1	e. The United States of America be awarded any other
2	and further relief that the Court deems just and proper.
3	DATED: March 11, 2009
4	THOMAS P. O'BRIEN United States Attorney
5	CHRISTINE C. EWELL Assistant United States Attorney
6	Chief, Criminal Division
7	A WILL
8	STEVEN R. WELK Assistant United States Attorney
9	Chief, Asset Forfeiture Section
10	Attorneys for Plaintiff United States of America
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# **VERIFICATION** 1 I, Maura Kelley, declare and say that: 2 I am a Special Agent with the Federal Bureau of 3 Investigation. 4 I have read the attached Complaint for Forfeiture and 5 2. know the contents thereof. 6 The information contained in the Complaint is either 3. 7 known to me personally, was furnished to me by bank personnel, 8 official government sources, or obtained pursuant to subpoena. I am informed and believe that the allegations set out in the 10 Complaint are true. 11 I declare under penalty of perjury under the laws of the 12 United States that the foregoing is true and correct. 13 14 EXECUTED this \_\_\_\_\_ day of March, 2009 at \_\_\_\_\_, 15 16 California. (see following page) 17 18 FEDERAL BUREAU OF INVESTIGATION 19 20 21 22 23 24 25 26 27

# VERIFICATION

, Maura Kelley, declare and say that:

I am a Special Agent with the Federal Bureau of agation.

I have read the attached Complaint for Forfeiture and Jie contents thereof.

The information contained in the Complaint is either one personally, was furnished to me by bank personnel,

1 government sources, or obtained pursuant to subpoena. I

formed and believe that the allegations set out in the

nt are true.

declare under penalty of perjury under the laws of the

I States that the foregoing is true and correct.

ECUTED this \_\_\_\_\_ day of March, 2009 at forthuly

ornaa.

SPECIAL AGENT MAURA KELLEY

FEDERAL BUREAU OF INVESTIGATION

1	EXHIBIT A
2	Property seized fromGoldfinger Coin and Bullion 1330 Flynn, Camarillo, CA
3 4	(400) One Troy Ounce .999 Fine Silver Trade Unit (1) Silver Colored Bar 68.40 lbs.
5	(1) Silver Colored Bar 67.85 lbs. (4000) \$1 U.S. Silver Dollars
6	(1) Silver Colored Bar 66.75 lbs. (32) Gold Colored Bars 2.2 lbs. each
7	<ul><li>(5) 1 ounce Gold Colored Bars</li><li>(1) Silver Colored Bar 66.80 lbs.</li></ul>
8	(1) Silver Colored Bar 68.60 lbs. (1) Silver Colored Bar 67.10 lbs.
9	(1) Silver Colored Bar 70.55 lbs. (1) Silver Colored Bar 66.45 lbs.
10	(1) Silver Colored Bar 66.95 lbs. (1) Silver Colored Bar 68.90 lbs.
11	(\$19,071.90) in dimes (8) Silver Bars 6.85 lbs. (2) Silver Bars 6.80 lbs.
12	, ,
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14	· · · · · · · · · · · · · · · · · · ·
15	(50) Silver Coins 1 ounce (500) Liberty Silver Coins 1 ounce
16	(95) Silver Coins 1 ounce
17	(300) Silver Buffalo 1 ounce
18	(1) Container Casting Grain 150 ounces .9999 Gold
19	(240) 1/10 ounce Canadian Maple Leaf Coin
20	(200) Gold Bars, 1 ounce (20) 2002 American Gold Eagle Coins
21	(5) 1 ounce (5) 1/2 ounce
22	(5) 1/4 ounce (5) 1/10 ounce
23	(16) 1998 American Gold Eagle Coins
24	(4) 1 ounce (4) ½ ounce (4) 1/4 ounce
25	(4) 1/4 ounce (4) 1/10 ounce (100) Republic Oesterreich 1 ounce schilling
26 27	(100) Republic Desterreich i Dunce schiffing (100) Silver Trade Unit 1 ounce
28	<del>-21</del> -
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(40) coins: 2 container of 20
    (4) 2002 American Eagle (proof)
    (1) 2001 U.S. Silver Dollar (proof)
2
    (8) Aussie Kookabara (1 kilo)
    (1) 2 ounce Aussie Kangaroo Nugget
3
    (1) Aussie Koala 1 ounce
    (10) coins, 2000 U.S. Mint Silver (proof)
4
    (200) $1.00 Peace Coins
    (3) Silver Bars
5
         10.22 ounces
 6
         10.28 ounces
         10.25 ounces
    (8) 10 Troy ounces Silver BMS
 7
    (400) Franklin ½ dollars
 8
    (200) U.S. Silver dollars
    (100) Australian 1 ounce Gold Coin
    (4) 2001 Silver American Eagle 1 ounce
 9
    (16) American Gold Eagle
    (1000) 1/10 ounce American Gold Eagle
10
    (10) American Eagle 1989-s
                                2000 schilling 1 ounce gold
    (200) Republic Oesterreich
11
    (15) American Eagle 1987-s
    (8) American Eagle 1 ounce silver
12
    (10) $1 Silver Coin 2000-P
    (3) Gold Coin 1914-s
13
    (10) sets America Gold Eagle; $5, $10, $25, $50; 2002
    (3) sets American Gold Eagle; $5, $10, $25, $50; 2000
14
    (200) Austrian 1 ounce Gold Coins
    (49) 2 ounce Australian Nugget Gold Coins
15
    (600) 1/10 ounce American Gold Eagle
    (240) 1/10 ounce Canadian Maple Leaf Gold
16
    (4) American Eagle 1 ounce Platinum
    (3) Canadian Maple Leaf 1 ounce Platinum
17
    (2) Isle of Mann, 1 ounce Platinum
    (1) Credit Suisse, 1 ounce Platinum
18
    (1) Eagle, 1 ounce Platinum
    (260) 1/10 ounce Canada Maple Leaf Gold Coins
19
    (Currency): $6440- $20 X 322
20
                $1364- $100 X 5, $5 X 1, $20 X 39, $10 X 39, $10 X 2,
                $1.00 X 14
21
    (120) 1 ounce Krugerrand
    (100) Canadian Maple Leaf Gold Coins 1 ounce
22
    (420) American Gold Eagle $50.00
    (78) ½ ounce Canadian Maple Leaf
23
    (34) 1/4 ounce Canadian Maple Leaf
    (50) Canadian Maple Leaf 1 ounce
24
    (12) American Gold Eagle ½ ounce
    (12) American Gold Eagle 1 ounce
25
    (10) American Gold Eagle 1/4 ounce
    (10) American Eagle 2/10 ounce
26
    (100) Canadian Maple Leaf 1 ounce
27
28
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as

(215) Krugerrand 1 ounce (180) Canadian Maple Leaf Golf Coins 1 ounce (90) American Gold Eagle Coins 2 (120) American Gold Eagle (100) Canadian Maple Leaf 1 ounce 3 (100) Krugerrand 1 ounce (100) Canadian Maple Leaf 1 ounce (47) Australian Nugget Gold Coins 1 ounce (1) 10 pesos coins with Segundo Muleio on it 5 (3) 5 pesos coins with Estador Mexicana on it (3) boxes of Cash Link Electronic cash cards containing 349 cards 6 in box1; 347 cards in box 2; and 287 cards in box 3 (1) plastic container with 380 U.S. Silver Eagle 1 ounce 7 (3) U.S. Mercury Dimes, BU, 1937,1939,1940 (18) Silver dimes (1) Silver Unit coin (1) Silver Quarter 1892 9 (2) pennies (1) German Coin (Nazi) with a "2" on it 10 (1) German Coin (Nazi) with a "5" on it (1) e-Bullion Electronic cash card and cryptocard 11 #6034.1101.4000.0603 (9) U.S. American Silver Eagle 2001 12 (4) 2000 U.S. Mint Silver Proof Sets (3) 2001 U.S. Mint American Buffalo Commemorative Coin Sets 13 (proof) (1) U.S. Silver Eagle, 1 ounce, with walking Liberty in Gold 14 (2) 2000 U.S. Silver Eagle 1 ounce color enhanced by Pearth Mint (14) 1999 Canada 1 ounce silver coins, Elizabeth II \$5 dollars 15 (1) 1985 Canada, 1 ounce Gold Coin, Elizabeth II (1) 1999 Austria 1 ounce Gold Coin 16 (1) Credit Suisse, 1 ounce gold Ignot (1) 1999 Australian 1 ounce fold coin, Elizabeth II 17 (5) 1997 U.S. Silver Eagle 1 ounce (1) 2002 U.S. Silver Eagle 1 ounce 18 (1) white plastic bucket containing 10,000 U.S. Silver Dimes, 19 face value \$1,000 (1) white plastic bucket containing 4,000 U.S. Silver Quarters, face value \$1,000 20 Property Seized From 2090 Baja Vista Way, Camarillo 21 (2) U.S. Silver Eagle 1 ounce 22 Computer Equipment 23 eMac rack mount server, serial number QP34612MNP2 with one Hitachi Deskstar IC35L180AVV207-1 180 GB SCSI hard drive, 24 serial number IJ33802CZP0DA 25 eMac xserve2 rack mount server, serial number QP61106YRTS (1) with one Maxtor 6L080M0 80 GB hard drive, serial number 26 L226F8FG. 27

(1) eMac RAID rack mount server serial number QP611013U3G with seven Hitachi Deskstar # HDS725050KLAT80 500 GB SCSI hard drives with serial number IX50800Q0TR8A