

Full details of U.S. Court papers indicting Alison-Madueke, Omokore, Aluko

United States prosecutors have provided details of how Nigeria's former minister of petroleum, Diezani Alison-Madueke, and her two business cronies, Jide Omokore, and Kola Aluko, lavished billions of naira on property and luxury items in the U.S. and United Kingdom.

In a civil forfeiture notice filed by the U.S. Department of Justice, DoJ, on Friday, prosecutors detailed how Messrs. Aluko and Omokore allegedly conspired to bribe the former minister, purchasing property worth millions of dollars in London for Mrs. Alison-Madueke and her family.

The two are accused of buying a total of four residential properties in and around London worth 11.45 million, and furnishing them with luxury items, including art work.

Read below full details of court processes filed by the Department of Justice.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

) UNITED STATES OF AMERICA,))

Plaintiff,

- v. -

THE M/Y GALACTICA STAR, BEING A 65-METER MOTOR YACHT BUILT BY HEESEN SHIPYARDS WITH INTERNATIONAL MARITIME ORGANIZATION NUMBER 9679830, AND REGISTERED UNDER THE LAWS AND FLAG OF THE CAYMAN ISLANDS AT THE PORT OF GEORGE TOWN, INCLUDING ALL FIXTURES, FITTINGS, MANUALS, STOCKS, STORES, INVENTORIES, AND EACH LIFEBOAT, TENDER, AND OTHER APPURTENANCE THERETO, INCLUDING, BUT NOT LIMITED TO, THE TENDER BOAT RECORDED AS A 7.5 METER DARIEL "GUEST TENDER" WITH ID/SERIAL NO. DRLDT759G313, AND ANY PROPERTY TRACEABLE THERETO;

ANY AND ALL FUNDS, PROCEEDS, CASH, OR BENEFITS TO BE DISBURSED OR OTHERWISE OWING TO ONE57 79 INC., OR TO ITS SUCCESSORS OR ASSIGNS, OUT OF ANY SURPLUS FUNDS

RESULTING FROM THE FORECLOSURE AUCTION, TO BE HELD ON OR ABOUT JULY 19, 2017, OF REAL PROPERTY LOCATED IN NEW YORK, N.Y., AND COMMONLY KNOWN AS 157 WEST 57TH STREET, UNIT 79, NEW YORK, N.Y. 10019;

REAL PROPERTY LOCATED IN NEW YORK, N.Y., COMMONLY KNOWN AS

(VERIFIED COMPLAINT)

Civil No. _____

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(REAL PROPERTY LOCATED IN) MONTECITO, CALIF., COMMONLY) KNOWN AS 807 CIMA DEL MUNDO) ROAD, MONTECITO, CALIF. 90077,) AND ALL APPURTENANCES,) IMPROVEMENTS, AND) ATTACHMENTS LOCATED THEREON,) AND ANY PROPERTY TRACEABLE) THERETO;)) REAL PROPERTY LOCATED IN) MONTECITO, CALIF., COMMONLY) KNOWN AS 815 CIMA DEL MUNDO) ROAD, MONTECITO, CALIF. 90077,) AND ALL APPURTENANCES,) IMPROVEMENTS, AND) ATTACHMENTS LOCATED THEREON,) AND ANY PROPERTY TRACEABLE) THERETO;)) ALL RIGHTS AND INTERESTS HELD) BY RIVERMOUNT INTERNATIONAL) LTD., OR ITS AFFILIATES OR) ASSIGNEES, IN THE SUBORDINATED) CONVERTIBLE PROMISSORY NOTE) EXECUTED BETWEEN CROSS) HOLDINGS, INC., AND RIVERMOUNT) INTERNATIONAL LTD., DATED ON OR) ABOUT JULY 15, 2015, AS VARIED OR) AMENDED BY THE PARTIES) THERETO, AND ALL PROPERTY) TRACEABLE THERETO;)) Defendants In Rem) _____)

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1049 FIFTH AVENUE, UNITS 11B AND 12B, NEW YORK, N.Y. 10032, AND ALL APPURTENANCES, IMPROVEMENTS,) AND ATTACHMENTS LOCATED) THEREON, AND ANY PROPERTY) TRACEABLE THERETO;)

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Comes now the Plaintiff, the United States of America, through its undersigned attorneys, and alleges, upon information and belief, as follows:

I.
NATURE OF THE ACTION

1. This is an action in rem to forfeit approximately \$144 million in assets, and any property traceable thereto, derived from an international conspiracy to obtain lucrative business opportunities in the Nigerian oil and gas sector in return for corruptly offering and giving millions of dollars' worth of gifts and benefits to the former Nigerian Minister for Petroleum Resources, Diezani Alison-Madueke ("ALISON-MADUEKE"); and to subsequently launder the proceeds of the illicit business opportunities into and through the United States.

2. From in or about April 2010 until in or about May 2015, ALISON-MADUEKE— who was often referred to as "the Madam" or "Madam D"— was Nigeria's Minister for Petroleum Resources. In that role, she was responsible for overseeing Nigeria's state-owned oil company, the Nigerian National Petroleum Corporation ("NNPC").

3. As alleged herein, Kolawole Akanni Aluko ("ALUKO"), Olajide Omokore ("OMOKORE"), and others: (i) conspired to and did purchase millions of dollars in real estate in and around London, U.K., for the use and benefit of ALISON-MADUEKE and her family; (ii) conspired to and did provide more than one million dollars in furniture, artwork, and other furnishings purchased within the Southern District of Texas, and shipped, in part, to London and Abuja, Nigeria, for the use and benefit of ALISON-MADUEKE and her family; and (iii) conspired to and did otherwise fund a lavish and privileged lifestyle for ALISON-MADUEKE and her family.

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4. As further alleged herein, ALISON-MADUEKE, in return for such improper inducements, used her influence as the Minister for Petroleum Resources to steer to companies beneficially owned by ALUKO and OMOKORE the award of multiple Strategic Alliance Agreements ("SAAs") with an NNPC subsidiary.

5. As further alleged herein, the companies that received these SAAs were unqualified and either improperly performed their obligations or, in some instances, failed entirely to perform. Nevertheless, these companies

received more than \$1.5 billion in revenues through the sale of Nigerian crude oil.

6. As further alleged herein, ALUKO and OMOKORE laundered their illicit revenues into and through the United States and, in particular, used these revenues to acquire the Defendants In Rem.

7. As further alleged herein, ALUKO and OMOKORE used a series of shell companies and layered financial transactions to conceal the nature, location, source, and/or ownership of the proceeds of the unlawful conduct and of the Defendants In Rem purchased with such proceeds.

8. As property constituting, derived from, or traceable to the proceeds of “specified unlawful activity,” as that term is defined in 18 U.S.C. § 1956(c) (7), or a conspiracy to commit “specified unlawful activity,” and as property involved in money laundering violations of 18 U.S.C. §§ 1956 and 1957, the Defendants In Rem are subject to forfeiture under 18 U.S.C. §§ 981(a) (1)(A) and 981(a)(1)(C).

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II.

THE DEFENDANTS IN REM

9. This is an action by the United States of America seeking forfeiture of all right, title, and interest in the following property (collectively, the “Defendants In Rem”):

(a) The M/Y Galactica Star, being a 65-meter motor yacht built by Heesen Shipyards with International Maritime Organization number 9679830, and registered in the Cayman Islands at the Port of George Town, including all fixtures, fittings, manuals, stocks, stores, inventories, and each lifeboat, tender, and other appurtenance thereto, including, but not limited to, the tender boat recorded as a 7.5 meter Dariel “guest tender” with ID/Serial No. DRLDT759G313, and any property traceable thereto (hereinafter the “GALACTICA STAR”);

(b) any and all funds, proceeds, cash, or benefits to be disbursed or otherwise owing to One57 79 Inc., or to its successors or assigns, out of any surplus funds resulting from the foreclosure auction to be held on or about July 19, 2017, of real property located in New York, N.Y., and commonly known as 157 West 57th Street, Unit 79, New York, N.Y. 10019, as more fully described in Attachment A (hereinafter the “157 WEST 57TH STREET SURPLUS PROCEEDS”);

- (c) real property located in New York, N.Y., commonly known as 1049 Fifth Avenue, Units 11B and 12B, New York, N.Y. 10032, as more fully described in Attachment B, and all appurtenances, improvements, and attachments located thereon, and any property traceable thereto (hereinafter the "1049 FIFTH AVENUE UNITS");
- (d) real property located in Montecito, Calif., commonly known as 807 Cima del Mundo Road, Montecito, Calif. 90077, as more fully described in Attachment C, and all appurtenances, improvements, and attachments located thereon, and any property traceable thereto (hereinafter "807 CIMA DEL MUNDO ROAD");
- (e) real property located in Montecito, Calif., commonly known as 815 Cima del Mundo Road, Montecito, Calif. 90077, as more fully described in Attachment D, and all appurtenances, improvements, and attachments located thereon, and any property traceable thereto (hereinafter "815 CIMA DEL MUNDO ROAD");
- (f) all rights and interests held by Rivermount International Ltd., or its affiliates or assignees, in the Subordinated Convertible Promissory Note executed between Cross Holdings, Inc., and Rivermount International Ltd., dated on or about July 15, 2015, as varied or amended by the parties thereto, and all5

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property traceable thereto (hereinafter the "CROSS HOLDINGS PROMISSORY NOTE").

III. JURISDICTION AND VENUE

10. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1345 and 28 U.S.C. § 1355(a).

11. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts and omissions giving rise to forfeiture took place in the Southern District of Texas.

12. This action in rem for forfeiture is governed by 18 U.S.C. §§ 981 and 983, the Federal Rules of Civil Procedure, and the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

IV. STATUTORY BASIS FOR FORFEITURE

13. The Defendants In Rem are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) because they constitute or are derived from proceeds traceable to a violation of an offense constituting a "specified unlawful activity" or a conspiracy to commit such an offense. "Specified unlawful

activity” is defined in 18 U.S.C. § 1956(c)(7) to include an offense against a foreign nation involving “bribery of a public official, or the misappropriation, theft, or embezzlement of public funds by or for the benefit of a public official,” see 18 U.S.C. § 1956(c)(7)(B)(iv); any felony violation of the Foreign Corrupt Practices Act (“FCPA”), see 18 U.S.C. § 1956(c)(7)(D); or any violations of 18 U.S.C. §§ 1343 (wire fraud), 2314 (interstate transportation of stolen property), and 2315 (interstate receipt of stolen property), see 18 U.S.C. §§ 1956(c)(7)(A) & 1961(1).

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14. The Defendants In Rem are also subject to forfeiture under 18 U.S.C. § 981(a)(1)(A) because they constitute property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1957, or are traceable to such property. Section 1957 prohibits the conducting of a monetary transaction with property valued at over \$10,000 that is known to be criminally derived and which constitutes the proceeds of “specified unlawful activity,” including the proceeds of an offense against a foreign nation involving “bribery of a public official, or the misappropriation, theft, or embezzlement of public funds by or for the benefit of a public official,” see 18 U.S.C. § 1956(c)(7)(B)(iv); of any felony violation of the FCPA, see 18 U.S.C. § 1956(c)(7)(D); or of any violations of 18 U.S.C. §§ 1343 (wire fraud), 2314 (interstate transportation of stolen property), and 2315 (interstate receipt of stolen property), see 18 U.S.C. §§ 1956(c)(7)(A) & 1961(1).

15. The Defendants In Rem are further subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because they constitute property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956(a)(1)(B), or are traceable to such property. Section 1956(a)(1)(B) prohibits the conducting of a financial transaction with property known to be the proceeds of unlawful activity with the intent to conceal the nature, location, source, ownership, or control of the proceeds of a specified unlawful activity, including the proceeds of an offense against a foreign nation involving “bribery of a public official, or the misappropriation, theft, or embezzlement of public funds by or for the benefit of a public official,” see 18 U.S.C. § 1956(c)(7)(B)(iv); of any felony violation of the FCPA, see 18 U.S.C. § 1956(c)(7)(D); or of any violations of 18 U.S.C. §§ 1343 (wire fraud), 2314 (interstate transportation of stolen property), and 2315 (interstate receipt of stolen property), see 18 U.S.C. §§ 1956(c)(7)(A) & 1961(1).

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16. The Defendants In Rem are further subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because they constitute property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956(a)(2), or are traceable to such property. Section 1956(a)(2) prohibits transferring funds known to be the proceeds of unlawful activity from a place outside the United States to a place in the United States, with knowledge that the transfer is designed in whole or in part to conceal the nature, location, source, ownership, or control of the proceeds of a specified unlawful activity, including the proceeds of an offense against a foreign nation involving “bribery of a public official, or the misappropriation, theft, or embezzlement of public funds by or for the benefit of a public official,” see 18 U.S.C. § 1956(c)(7)(B)(iv); of any felony violation of the FCPA, see 18 U.S.C. § 1956(c)(7)(D); or of any violations of 18 U.S.C. §§ 1343 (wire fraud), 2314 (interstate transportation of stolen property), and 2315 (interstate receipt of stolen property), see 18 U.S.C. §§ 1956(c)(7)(A) & 1961(1).

17. The Defendants In Rem are further subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because they constitute property involved in a conspiracy to violate 18 U.S.C. §§ 1956 or 1957, in violation of 18 U.S.C. § 1956(h).

18. A representative selection of relevant offenses against a foreign nation as referred to in ¶¶ 13-17 are set forth in Attachment E.

V.

RELEVANT PERSONS AND ENTITIES

On information and belief, the United States alleges the following facts. Diezani ALISON-MADUEKE is the former Nigerian Minister for Petroleum Resources who served in that position from in or about April 2010 through in or about May 2015. In that role, ALISON-MADUEKE was responsible for overseeing NNPC. In her capacity as

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Minister for Petroleum Resources, ALISON-MADUEKE was a “foreign official” as that term is defined in the FCPA, see 15 U.S.C. §§ 78dd-1(f)(1)(A), 78dd-2(h)(2)(A), and 78dd-3(f)(2)(A).

21. The Nigerian National Petroleum Corporation is Nigeria's state-owned oil corporation through which the Federal Government of Nigeria regulates and participates in the country's petroleum and hydrocarbons industry. The NNPC was owned and controlled by the Nigerian government and performed government functions, and thus was an "instrumentality" within the meaning of the FCPA, see 15 U.S.C. §§ 78dd-1(f)(1)(A), 78dd-2(h)(2)(A), and 78dd-3(f)(2)(A).

22. The Nigerian Petroleum Development Company ("NPDC") is the wholly-owned operating subsidiary of NNPC. The NPDC was owned and controlled by the Nigerian government and performed government functions, and thus was an "instrumentality" within the meaning of the FCPA, see 15 U.S.C. §§ 78dd-1(f)(1)(A), 78dd-2(h)(2)(A), and 78dd-3(f)(2)(A).

23. Kolawole Akanni ALUKO is a Nigerian citizen whose last known residential address was in Porza-Lugano, Switzerland. ALUKO and OMOKORE (see below) are the beneficial owners of and have control over ATLANTIC ENERGY HOLDINGS LTD. along with that company's subsidiaries and affiliates—including ATLANTIC ENERGY DRILLING CONCEPTS NIGERIA LTD. and ATLANTIC ENERGY BRASS DEVELOPMENT LTD. ALUKO was also, at all times relevant to this complaint, a director and beneficial owner of TENKA LTD. and is the 100% owner of EARNSHAW ASSOCIATES LTD.

24. Olajide OMOKORE is a Nigerian citizen living in Lagos, Nigeria, and is a business partner of ALUKO. With ALUKO, OMOKORE is a beneficial owner of and has control over ATLANTIC ENERGY HOLDINGS LTD. along with that company's subsidiaries and

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affiliates—including ATLANTIC ENERGY DRILLING CONCEPTS NIGERIA LTD. and ATLANTIC ENERGY BRASS DEVELOPMENT LTD.

25. ATLANTIC ENERGY HOLDINGS LTD. ("AEH") is a company incorporated in the British Virgin Islands with registered address of 325 Waterfront Drive, Omar Hodge Building, Wickham's Cay, Road Town, Tortola, B.V.I. AEH is beneficially owned, directly or indirectly, by ALUKO and OMOKORE.

26. ATLANTIC ENERGY (BRASS) LTD. is a company incorporated in the

British Virgin Islands with the same registered address as AEH: 325 Waterfront Drive, Omar Hodge Building, Wickham's Cay, Road Town, Tortola, B.V.I. Upon information and belief, ATLANTIC ENERGY (BRASS) LTD. is beneficially owned, directly or indirectly, by ALUKO and OMOKORE.

27. ATLANTIC ENERGY DRILLING CONCEPTS NIGERIA LTD. ("AEDC") is a company incorporated in Nigeria with registered address of Plot 1267 Ahmadu Bello Way, Garki, Abuja, Nigeria. OMOKORE is a registered director of AEDC. AEH owns 49,999,999 of 50,000,000 shares of AEDC.

28. ATLANTIC ENERGY BRASS DEVELOPMENT LTD. ("AEBD") is a company incorporated in Nigeria with registered address of 32A Ademola Adetokunbo Street, Victoria Island, Lagos, Nigeria. OMOKORE is a registered director of AEBD. ATLANTIC ENERGY (BRASS) LTD. owns 9,999,999 of 10,000,000 shares of AEBD.

29. TENKA LTD. ("TENKA") is a company incorporated in the United Kingdom with registered address of No. 1 London Bridge, London SE1 9BG, U.K. During all times relevant to this complaint, the directors of TENKA were ALUKO and his wife. Upon information and belief, TENKA is beneficially owned by ALUKO.

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30. EARNSHAW ASSOCIATES LTD. ("EARNSHAW") is a company incorporated in the British Virgin Islands with registered address of 24 De Castro Street, Akara Building, Wickham's Cay 1, Road Town, Tortola, B.V. I. ALUKO owns 100% of EARNSHAW.

31. CO-CONSPIRATOR #1 is a dual citizen of the United States and Nigeria whose principal residence is in Topanga, Calif.

32. CO-CONSPIRATOR #2 is a Nigerian citizen and a former resident of the United States who maintained a residence in Potomac, Md.

33. CO-CONSPIRATOR #3 is a dual citizen of the United States and Nigeria and a former resident of the United States who maintained a residence in Oakland, Calif.

VI. FACTS

A. Strategic Alliance Agreements and Oil Mining Leases

34. Prior to 2010, NNPC participated in a joint venture with the subsidiary of a major international oil company (the "IOC Subsidiary") for the development and production of oil and gas in connection with eight oil mining leases ("OMLs"). In particular, the joint venture held interests in and operated OMLs 26, 30, 34, and 42 (the "Forcados OMLs") and OMLs 60, 61, 62, and 63 (the "Brass OMLs").

35. The IOC Subsidiary owned 45% of the joint venture, with the remainder owned by NNPC. In 2010, however, the IOC Subsidiary chose to divest itself and sold its minority stake to various indigenous Nigerian entities.

36. With the IOC Subsidiary's departure, NNPC became responsible for financing and operating the OMLs. It assigned this task—along with its 55% majority stake—to its own operating subsidiary, NPDC. However, NPDC lacked the in-house technical expertise and the

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financial resources to fund and operate the OMLs. NPDC therefore sought to enter into Strategic

Alliance Agreements to partner with outside parties who could both finance and provide technical assistance for the operation of the OMLs on NPDC's behalf.

B. ALISON-MADUEKE Was Instrumental in the Award of the Lucrative Forcados SAAs (OMLs 26, 30, 34, and 42) to AEDC

37. AEDC was incorporated in Nigeria on or about July 19, 2010, approximately three months after ALISON-MADUEKE was appointed Minister for Petroleum Resources.

38. On or about March 8, 2011, AEDC first expressed its interest in entering into an SAA in a letter to NPDC. Less than three weeks later, on or about March 28, 2011, ALUKO, acting on behalf of AEDC, attended a meeting with NPDC representatives to discuss a possible SAA award.

39. Within another three weeks, on or about April 20, 2011, AEDC and NPDC entered into SAAs for OMLs 26 and 42. These SAAs were signed

by OMOKORE on behalf of AEDC.

40. Approximately one month later, on or about May 25, 2011, AEDC and NPDC entered into two more SAAs for OMLs 30 and 34. These SAAs were also signed by OMOKORE on behalf of AEDC. (The four SAAs for OMLs 26, 30, 34, and 42 are herein collectively referred to as the “Forcados SAAs.”)

41. NPDC’s award of the Forcados SAAs to AEDC was done with the knowledge and support of ALISON-MADUEKE and at her direction. For example, in a recorded conversation between ALISON-MADUEKE and ALUKO, ALISON-MADUEKE acknowledged that “we stuck our necks out regarding the SAA and we supported it.” See *infra* ¶ 118.

42. A February 2014 report prepared by the then-governor of the Central Bank of Nigeria determined that AEDC “had neither the technical expertise nor the capital to develop the joint venture, but [was] none-the-less able to lift crude and retain the proceeds . . . up to 70% of

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the profit of the Joint Venture.” The report concluded that the arrangement was set up “for the purpose of acquiring assets belonging to the [Federal Republic of Nigeria] and transferring the income to private hands.”

(1) Terms of the Forcados SAAs

43. The Forcados SAAs required AEDC to pay non-recoverable entry fees prior to the SAAs’ taking effect. The value of the entry fees was to be determined based on the estimated probable oil and gas reserves within the area covered by the Forcados OMLs.

44. In addition, the Forcados SAAs each required AEDC to pay \$350,000 per year to NPDC for the first five years of the agreements. These funds were to be used for the provision of training facilities for NPDC staff.

45. Finally, the Forcados SAAs required AEDC to “provide all the funds required for NPDC’s 55% share of Petroleum Operating Costs.” Upon information and belief, NPDC’s share of the operating costs for the Forcados OMLs, during the period from March 2011 through December 2015, was at least \$1,400,000,000.

46. In return for meeting its obligations under the Forcados SAAs, AEDC would be entitled to recover the cost of financing NPDC's share of the operating costs (as described in the preceding paragraph) and would be further entitled to a share of NPDC's profit as determined by profit-sharing formulae contained in the SAAs.

47. AEDC's entitlements were payable in-kind. That is, AEDC would receive allocations of available oil sufficient to cover the amounts due as cost-recovery and profit.

(2) AEDC's Performance Under the Forcados SAAs

48. Upon information and belief, AEDC substantially failed to perform under the Forcados SAAs. In particular, upon information and belief, AEDC did not fulfill its requirement

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to fund training facilities for NPDC staff, leading to an outstanding obligation of approximately \$5,600,000.

49. Furthermore, AEDC failed to cover NPDC's share of the Forcados operating costs. Upon information and belief, of the more than \$1,400,000,000 required to finance such costs, AEDC made contributions of only approximately \$305,108,522.43.

50. Despite AEDC's failure to fulfil its obligations under the Forcados SAAs, AEDC was, upon information and belief, allocated and permitted to lift and sell, for its own benefit, twenty-one cargoes of crude oil valued at approximately \$677,238,673.

C. ALUKO, OMOKORE, and Others Conspire to Purchase £11,530,000 Worth of London Real Estate for the Benefit of ALISON-MADUEKE

51. Concurrent with the negotiations for and the award of the Forcados SAAs, ALUKO and OMOKORE, acting in concert with CO-CONSPIRATORS #1 and #2, purchased and refurbished several multi-million dollar properties in the London area for the benefit of ALISON-MADUEKE and her family members. ALUKO, OMOKORE, and CO-CONSPIRATORS #1 and #2 provided these properties to ALISON-MADUEKE for the corrupt purpose of inducing her to use her influence within the Ministry of Petroleum Resources, the NNPC, and the NPDC to

direct the award of business opportunities to entities under their control and beneficial ownership, including the award of the Forcados SAAs to AEDC.

(1) 96 Camp Road, Gerrards Cross, Buckinghamshire, SL9 7PB

52. On or about January 27, 2011, i.e., less than two months before AEDC officially approached NPDC about the first of the Forcados SAAs, a Seychelles company named Miranda International Ltd. purchased a property known as “the Falls” for £3,250,000. The Falls is located just outside London at 96 Camp Road, Gerrards Cross, Buckinghamshire SL9 7PB.

53. Miranda International Ltd. is beneficially owned by OMOKORE. 14

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54. ALUKO engaged a construction company (the “Construction Company”) to upgrade and maintain the plumbing, electrical, air conditioning, and audio-visual systems at the Falls.

55. OMOKORE and ALUKO purchased and improved the Falls for the exclusive use of ALISON-MADUEKE and her family.

56. A mobile telephone recovered at the known residences of ALISON-MADUEKE and her mother contained digital photographs of ALISON-MADUEKE present inside the Falls.

57. Furthermore, during the relevant period, ALISON-MADUEKE—who was addressed at the property as “the Madam”—was the only person who occupied the property.

58. Individuals who provided services at the Falls addressed its occupant as “the Madam” or were told that the person they worked for was known as “the Madam.”

59. Finally, on or about October 8, 2013, ALUKO used his American Express card to purchase two identical exercise machines at Harrods in London. The machines were purchased for £10,926 each. One was to be delivered to the known London address of ALISON-MADUEKE; the other was to be delivered to the Falls.

(2) 39 Chester Close North, London NW1 4JE

60. On or about March 24, 2011—i.e., just four days before ALUKO met with NPDC officials to discuss AEDC's interest in an SAA—a British Virgin Islands company called Mortlake Investments Ltd. was used to purchase real property at 39 Chester Close North, London NW1 4JE ("39 Chester Close North") for £1,730,000.

61. Mortlake Investments Ltd. is beneficially owned by ALUKO.

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62. The real estate company Daniel Ford & Co. assisted in the purchase of 39 Chester Close North. The same company assisted in the purchase of additional properties as detailed below. See infra ¶¶ 65 & 70.

63. ALUKO engaged the Construction Company to undertake extensive alterations and renovations at 39 Chester Close North, including the installation of an elevator. An employee of the Construction Company ("Construction Company Employee #1") has stated that the intended occupants of 39 Chester Close North were ALISON-MADUEKE's mother and son. Construction Company Employee #1 personally met ALISON-MADUEKE on at least two occasions at the property and, on one of those occasions, ALISON-MADUEKE selected stone flooring and countertops to be installed in the bathrooms.

64. At some point in 2015, Construction Company Employee #1 was informed that ALISON-MADUEKE's mother and son would not be moving into 39 Chester Close North after all, and the Construction Company was instructed to remove the elevator and return the property to its original condition. The property was sold on or about July 22, 2015, for £2,224,000.

(3) 58 Harley House, Marylebone Road, London NW1 5HL

65. On or about March 28, 2011—i.e., the same day ALUKO was meeting with NPDC officials to discuss AEDC's interest in an SAA—a Seychelles company, Rosewood Investments Ltd., was used to purchase real property at 58 Harley House, Marylebone Road, London NW1 5HL ("58 Harley House") for £2,800,000.

Rosewood Investments Ltd. is beneficially owned by CO-CONSPIRATOR #2.

The same real estate agency used to purchase 39 Chester Close North, i.

e., Daniel Ford & Co., assisted in the purchase of 58 Harley House.

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68. As with 39 Chester Close North, ALUKO engaged the Construction Company to provide renovation services at 58 Harley House. On or about August 9, 2011, a second employee of the Construction Company (“Construction Company Employee #2”) forwarded by email to ALUKO design plans for the kitchen at 58 Harley House. ALUKO subsequently forwarded this email, including the design plans, to ALISON-MADUEKE.

69. In addition, Construction Company Employee #1 was introduced to ALISON- MADUEKE at 58 Harley House, on which occasion the employee was told ALISON-MADUEKE was “the architect.”

(4) Flat 5 Park View, 83-86 Prince Albert Road, London NW8 7RU

70. On or about March 29, 2011—i.e., the day after ALUKO met with NPDC officials to discuss AEDC’s interest in an SAA—another Seychelles company called Colinwood Ltd. was used to purchase real property at Flat 5 Park View, 83-86 Prince Albert Road, London NW8 7RU (“Flat 5 Park View”) for £3,750,000. The purchase was financed, in part, by a loan obtained from FBN Bank (UK) Ltd. by CO-CONSPIRATOR #1.

71. The same real estate company used to purchase 39 Chester Close North and 58 Harley House, i.e., Daniel Ford & Co., also assisted in the purchase of Flat 5 Park View.

72. As with both 39 Chester Close North and 58 Harley House, ALUKO engaged the Construction Company to perform significant renovations at Flat 5 Park View. Construction Company Employee #1 personally met ALISON-MADUEKE at Flat 5 Park View where she was present for a discussion of interior design plans. In addition, design plans for Flat 5 Park View were later found at the known London residence of ALISON-MADUEKE’s mother.

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D. Living and Lifestyle Expenses for ALISON-MADUEKE (1) Rental Payments

73. Beginning in August 2011 and continuing through January 2014, ALUKO and a company beneficially owned by him, Tracon Investments Ltd. ("Tracon"), made a total of at least £537,922 in rental payments for two central London residences both located at 22 St. Edmunds Terrace, London NW8 7QQ. The first residence, Flat 19, was occupied by ALISON-MADUEKE during this time period. The second residence, Flat 6, was occupied by ALISON-MADUEKE's mother during this time period.

74. The rental payments were made in the following approximate amounts, on or about the following dates, from the following payors:

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75. Upon information and belief, the above payments were made corruptly by, on behalf of, or at the direction of ALUKO for the purpose of benefiting ALISON-MADUEKE and her mother in return for ALISON-MADUEKE's having improperly influenced the award of the Forcados SAAs to AEDC and in anticipation of or in return for her improperly influencing the award of the Brass SAA, see *infra* ¶¶ 105-117, to AEDC and AEBD.

(2) Transportation Services

76. During the period from at least December 2012 through at least July 2014, ALUKO and his beneficially-owned company TENKA made at least £393,274.32 in payments to a car hire company (the "Chauffeur Company"). During that same time period, a company beneficially owned by OMOKORE, Energy Property Development Ltd., paid at least £4,424.40 to the Chauffeur Company.

77. The payments were made to the Chauffeur Company in the following approximate amounts, on or about the following dates, by the following payors:

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