

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALL FUNDS UP TO AND INCLUDING
\$1,474,517 IN INTERBANK
ACCOUNTS HELD BY OR FOR THE
BENEFIT OF NEDBANK, LTD. AT
BANK OF AMERICA NA, HSBC BANK
USA NA, STANDARD CHARTERED
BANK, THE BANK OF NEW YORK
MELLON, AND WELLS FARGO BANK
IN THE UNITED STATES AND NOT
TO EXCEED THE VALUE OF THE
CURRENT BALANCE OF ACCOUNTS
HELD BY OR FOR THE BENEFIT OF
MAHAMOUD ADAM BECHIR AT
NEDBANK, LTD. IN SOUTH AFRICA,
INCLUDING, BUT NOT LIMITED TO,
ACCOUNT NUMBER XXXXXX2794,
AND ALL ASSETS AT NEDBANK,
LTD. TRACEABLE THERETO,

Defendant *In Rem*.

Civil Case No. 14-1178 (RJL)

UNITED STATES' MOTION TO VACATE SEALING ORDER

Plaintiff, the United States of America, by and through its undersigned attorneys, respectfully moves the Court for an order vacating the order to seal the Verified Complaint for Forfeiture *in Rem* and its related filings in the above-captioned matter. In support of this motion, the United States the following:

1. On July 2, 2014, the United States sought an order sealing the above-captioned matter, except for the limited purpose of executing any warrant for arrest *in rem* against the

Defendant *in Rem*.

2. On July 20, 2014, this Court issued a Warrant for Arrest *in Rem*. On August 19, 2014, the United States filed a motion requesting an Amended Warrant for Arrest *in Rem* be issued, which this Court granted on August 21, 2014.

3. On September 9, 2014, a duly authorized officer executed the Amended Warrant for Arrest *in Rem* on Bank of America. As a result, a total of \$106,488.31 was seized. This amount is equivalent to the current balance of account number XXXXXX2794, and related accounts, held by Mahamoud Adam Bechir at Nedbank, Ltd. in South Africa.

4. The United States is now prepared to give notice of this forfeiture action to potential claimants in accordance with Rule G(4) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

Accordingly, the United States respectfully requests that the previously entered order sealing the above-captioned matter be **VACATED**. A proposed order is attached.

Respectfully submitted,

JAIKUMAR RAMASWAMY
Chief, ASSET FORFEITURE AND
MONEY LAUNDERING SECTION

Date: October 30, 2014

/s/

DANIEL H. CLAMAN
Assistant Deputy Chief
NALINA SOMBUNTHAM
Trial Attorney
ASSET FORFEITURE AND
MONEY LAUNDERING SECTION
CRIMINAL DIVISION
U.S. DEPARTMENT OF JUSTICE
1400 New York Avenue, N.W., 10th Floor
Washington, D.C. 20530
Telephone: (202) 514-1263

Fax: (202) 514-5522

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALL FUNDS UP TO AND INCLUDING
\$1,474,517 IN INTERBANK ACCOUNTS
HELD BY OR FOR THE BENEFIT OF
NEDBANK, LTD. AT BANK OF
AMERICA NA, HSBC BANK USA NA,
STANDARD CHARTERED BANK, THE
BANK OF NEW YORK MELLON, AND
WELLS FARGO BANK IN THE UNITED
STATES AND NOT TO EXCEED THE
VALUE OF THE BALANCE OF
ACCOUNT XXXXXX2794 HELD IN THE
NAME OF MAHAMOUD ADAM BECHIR
AT NEDBANK, LTD. IN PRETORIA,
SOUTH AFRICA AND ALL ASSETS AT
NEDBANK, LTD. TRACEABLE
THERETO,

Defendant *In Rem.*

Civil Case No. 14-1178 (RJL)

ORDER TO VACATE SEAL

Upon consideration of the United States' Motion To Vacate Sealing Order, and the Court finding good cause, it is hereby

ORDERED that the United States Motion To Vacate Sealing Order is **GRANTED**; and the Court's previous order sealing the Verified Complaint and its related filings, as well as the file in the above-captioned matter, is **VACATED**.

DATED: _____

THE HONORABLE RICHARD J. LEON
UNITED STATES DISTRICT JUDGE