

FILED-EDM  
93 JUL 26 PM 3:55  
U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

93C 4488

UNITED STATES OF AMERICA,  
Plaintiff,

v.

FUNDS IN ACCOUNT 263226700  
HELD BY FIRST HERITAGE BANK IN  
THE NAME OF BOLA TINUBU,

FUNDS IN ACCOUNTS 39483134,  
39483396, 4650279566, 00400220,  
39936404, 39936383,  
HELD BY CITIBANK, N.A.  
IN THE NAME OF BOLA TINUBU OR  
COMPASS FINANCE & INVESTMENT CO.,

FUNDS IN ACCOUNTS 52050-89451952,  
52050-89451952, 52050-89451953  
HELD BY CITIBANK, INTERNATIONAL  
IN THE NAME OF BOLA TINUBU,

Defendants.

No. ~~JUDGE~~ NORDBERG  
Judge MAGISTRATE JUDGE RUCKLO

A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK  
By: s/ JOHNNY KHOU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS  
August 10, 2022



DOCKETED  
JUL 28 1993

VERIFIED COMPLAINT FOR FORFEITURE

The United States of America, by its attorney, Michael J. Shepard, United States Attorney for the Northern District of Illinois, for its verified complaint for forfeiture, states as follows:

1. This is a forfeiture action under 21 U.S.C. § 881 and 18 U.S.C. § 981. This court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and 1355.
2. The defendant funds are located in the above-described accounts and were seized pursuant to process issued by this court.

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This court has venue in this matter pursuant to 28 U.S.C. § 1355 because criminal activity giving rise to this forfeiture action occurred in this district.

3. This complaint is verified by the affidavit of Special Agent Kevin Moss which is attached hereto and incorporated by reference in this complaint.

4. As is stated more fully in the attached affidavit, beginning as early as 1988, Adegboyega Mueez Akande, with others, operated a organization which distributed white heroin, a controlled substance under Title 21 of the United States Code.

5. As is stated more fully in the attached affidavit, this distribution operation was conducted on a large scale and the proceeds of the operation were substantial. The defendant funds represent proceeds of this operation or property involved in money laundering.

6. By reason of facts set forth above and in the attached affidavit, there is probable cause to believe that the defendant funds represent proceeds of narcotics trafficking and further represent property involved in money laundering in violation of 18 U.S.C. §§ 1956 and 1957. The defendant funds are therefore forfeitable to the United States pursuant to 21 U.S.C. § 881 and 18 U.S.C. §981.

WHEREFORE, the United States requests:


1. that the defendant funds be proceeded against for forfeiture and condemnation, that warrants of seizure and monition issue and that due notice be give to all interested parties to appear and show cause why the forfeiture should not be decreed; and

2. that the Court adjudge and decree that the defendant funds be forfeited to the United States and that the defendant funds be disposed of according to law.

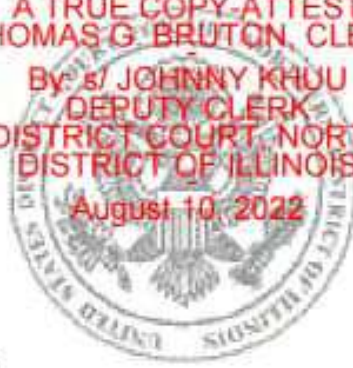
Respectfully submitted,

MICHAEL J. SHEPARD  
United States Attorney

By:

  
MARSHA A. MCCLELLAN  
Assistant United States Attorney  
219 South Dearborn Street  
Chicago, Illinois 60604  
(312) 353-2814

A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK  
By: s/ JOHNNY KHOU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS  
August 10, 2022



**EILED**

JUL 26 1993

H. STUART CUNNINGHAM  
CLERK, U. S. DISTRICT COURT

STATE OF ILLINOIS )  
                          ) ss  
COUNTY OF COOK    )

AFFIDAVIT

KEVIN MOSS, being duly sworn on oath, deposes and states as follows:

1. I have been a Special Agent with the Internal Revenue Service (hereafter "IRS"), in the Criminal Investigation Division, for over fifteen (15) years.

2. As is detailed more specifically below, there is probable cause to believe that funds in certain bank accounts controlled by Bola Tinubu, were involved in financial transactions in violation of 18 U.S.C. §§1956 and 1957 and represent proceeds of drug trafficking; therefore these funds are forfeitable to the United States under 18 U.S.C. §981 and 21 U.S.C. §881(a)(6).

3. My responsibilities include the investigation of tax fraud and other financial crimes, including money laundering. I have become familiar with the methods commonly used to launder money by persons engaged in narcotics trafficking through training and experience. I have also discussed and compared information that I have about the methods used to launder money with other experienced federal, state and local law enforcement agents. Through training and experience, I have learned that narcotics traffickers must take steps to conceal their receipt of huge cash

1-2

proceeds that represent the profits received from the operation of their narcotics trafficking organizations. These steps include hiding large amounts of cash in safety deposit boxes or other concealed safes and "laundering" the cash through financial transactions. Often, to disguise their involvement in the transaction, the drug dealers make use of nominees and/or aliases. Drug traffickers commonly purchase assets with U.S. currency to reduce or eliminate the paper trail generated by their financial transactions. Frequently, when individuals involved in narcotics trafficking acquire assets or expend money, they do so using relatives, associates, nominees and/or aliases. These tactics promote the operation of the narcotics enterprise and conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the narcotics enterprise. Also, I have known individuals, who derive income from narcotics trafficking, to engage in monetary transactions with property valued in excess of \$10,000 that has been derived from criminal activity in violation of 18 U.S.C. §1957.

4. As part of my duties and responsibilities as a Special Agent with the IRS, I have been involved with other agents in an investigation of money laundering of the proceeds of a heroin distribution organization in the Chicago area. One aspect of this investigation concerns the money laundering activities of Adegboyega Mueez Akande. Through my own participation in this investigation and through information provided to me by other Special Agents of IRS, Drug Enforcement Administration in Hammond, Indiana, (hereafter "DEA") and the Federal Bureau of Investigation

in Merrillville, Indiana (hereafter "FBI"), I am familiar with all aspects of this investigation. The statements contained in this affidavit are based in part on information provided by Special Agents of the IRS, DEA, FBI, on information provided by confidential sources, and on my experience and background as a Special Agent of the IRS.

5. During this investigation, I have reviewed financial documents, including bank statements, Currency Transaction Reports, (hereafter CTRs), copies of money orders, cashier's checks and tax returns pertinent to this investigation and IRS records for the filing of 8300 forms. In addition to these documents, I have reviewed records of wire transfers of huge amounts of cash generated by individuals who are believed to be members of this heroin distribution organization.

6. Through my experience as a law enforcement officer, I have learned that large amounts of cash, often in small denominations, pose a significant logistical problem to drug traffickers. Thus, drug traffickers have a need to transform their illegal money into assets that appear to have been legitimately obtained or earned. This process usually entails the integration of the illegally obtained money into the banking system where it can be transferred to other accounts, both within the United States and overseas. The biggest hurdle in accomplishing this goal is often the initial integration of the illegal money into the banking system, in such a way that it appears legitimate, and the avoidance of IRS filing and reporting requirements. Debriefings of narcotics

traffickers and their associates by IRS, DEA and FBI Special Agents have revealed that these individuals are well aware of the paper trail that is created when cash over \$10,000 is brought to a financial institution, and that they seek ways to avoid that paper trail.

#### FACTS AND CIRCUMSTANCES

7. Prior to and during 1988, the DEA became involved in the investigation of a white heroin trafficking network operating in Chicago, Illinois and Hammond, Indiana. The investigation disclosed that an individual known as Lee Andrew Edwards was a source of white heroin. Edwards is currently incarcerated for attempting to murder a federal agent while the agent was executing a search warrant. Cocaine, heroin, guns and paraphernalia used to distribute drugs were recovered during the execution of the warrant. Edwards entered a guilty plea to the charges arising from the attempted murder of the federal agent.

8. A DEA confidential source (Source A) has provided reliable information to the DEA in its investigation into this white heroin distribution network. Information provided by Source A has been corroborated by an ongoing DEA investigation, FBI investigations, surveillances of Source A, consensual recordings of conversations, and a review of FBI and DEA records.

9. Source A provided reliable information about Lee Andrew Edwards including the identity of a telephone number which

activated an electronic pager. Source A reported that this number was to be called to place an order for white heroin. According to records reviewed, this pager was subscribed to by Adegboyega Mueez Akande at 7504 South Stewart Avenue, Chicago, Illinois.

10. During February 1988, an individual identified as Abiodun Agbele arrived in the United States from Nigeria. According to investigating agents of DEA, Agbele identified Akande as his uncle and stated that Akande provided him (Agbele) an apartment in Hammond, Indiana.

11. The investigation disclosed through interviews with Agbele that Akande returned to Nigeria in mid 1990; however, before he left, he instructed Agbele to serve as a source of white heroin for Lee Andrew Edwards. According to DEA investigators, Agbele sold white heroin to Edwards on numerous occasions. With the assistance of Source A, DEA called Agbele to purchase a small amount of white heroin. On November 20, 1990, Agbele sold one ounce of white heroin to a law enforcement officer working in an undercover capacity for \$7,000.

12. Subsequent to the sale of the white heroin to law enforcement officers, Agbele was arrested and agreed to cooperate by providing information regarding the white heroin distribution network of Akande.

13. During interviews with the law enforcement agents investigating this distribution network, Agbele confirmed that Akande was involved in the distribution of white heroin. As a result of his involvement in this business enterprise, Akande



generated huge profits that Agbele admitted he often wired to bank accounts on behalf of Akande.

14. According to Agbele, Akande controlled the operation of the white heroin distribution network from Nigeria in conjunction with other individuals in Nigeria and the United States. Much of the business, at the time the operation flourished, was conducted by telephone, although, according to Agbele, Akande occasionally travelled to the United States under an assumed name to retrieve portions of the drug profits.

15. During the course of the investigation, DEA agents learned that in November 1986, Adegboyega Mueez Akande completed a lease application for an apartment on which he listed his employment as an account representative for Globe-Link International. Akande listed his address as 7504 South Stewart Avenue, Chicago, Illinois and a former address as 7527 North Sheridan Road also in Chicago. On the application, Akande listed Audrey Akande as his spouse and his current landlord was identified as Christine Schaffer.

16. Further investigation by DEA disclosed that Abiodun Agbele also completed a lease application for an apartment in the same apartment complex located at 4050 W. 115th Street, Chicago, Illinois. In the application, Agbele stated that he was employed by Globe-Link as a sales representative. The investigators have confirmed that Adegboyega Mueez Akande maintained an apartment in this complex.

17. A review of the documents provided by the Secretary of State disclosed that Globe-Link International was owned by Mueez Adegboyega Akande. According to the 1985 corporate report, the company was located at 7527 North Sheridan Road and was in the business of consulting and business negotiations.

18. It is believed by this affiant that Adegboyega Mueez Akande and Mueez Adegboyega Akande are the same individual because of social security and tax information. Further, Agbele told agents investigating this matter that Nigerians often transpose their first and middle names or use aliases to avoid detection by immigration officials.

19. A review of the 1986 corporate report from the Secretary of State showed that Globe-Link was owned by Mueez A. Akande and other relatives. Audrey Akande was one of the relatives listed, and she was identified as Akande's wife. The business address remained 7527 North Sheridan Road, Chicago, Illinois.

20. A review of records from the IRS disclosed that Globe-Link was purportedly located at 7504 S. Stewart, Chicago, Illinois but received mail at a post office box. The building at this address is a two-flat with one of the residents being identified as Christine Schaffer, who is the mother of Audrey Akande and the mother-in-law of Adegboyega Mueez Akande. The IRS information further disclosed that Globe-Link filed one corporate tax return in 1987 showing taxable income in the amount of \$9,105. No other returns have been filed. Interviews with investigators from the U.S. Customs Service have disclosed that the address at 7504 S.

Stewart Avenue is known as a drop-off point for packages from Nigeria that contain white heroin.

21. This investigation has disclosed the identity of other individuals, including relatives, who have worked for Akande with various duties in the distribution organization. One of these individuals has been identified by the investigation as Bola Tinubu.

22. According to bank records from the First Heritage Bank, Country Club Hills, Illinois, Tinubu opened an individual money market account and a "NOW" account in December 1989. In the application, Tinubu stated that his address was 7504 South Stewart, Chicago, Illinois. This is the same address used previously by Akande and Globe-Link. Upon opening this account, Tinubu deposited \$1,000 in traveler's checks.

23. Bank records disclosed that five days after the account was opened, on January 4, 1990, \$80,000 was deposited into the NOW account at First Heritage Bank by wire transfer through First Chicago from Banc One Houston. The transaction was completed at the direction of Mirbec A. Akande who resided at 7930 Corporate Drive, Houston, Texas. A review of a credit bureau report shows that Adegboyega Mueez Akande previously used this address. Further, the investigation disclosed through a review of bank records that an individual named Mueez Adegboyega Akande had three accounts at Banc One.

24. According to bank employees, when Bola Tinubu came to First Heritage Bank in December 1989 to open the accounts, he was

introduced to them by Adegboyega Mueez Akande who at that time maintained an account at the bank.

25. According to bank records, Bola Tinubu also opened a joint checking account in his name and the name of his wife, Oluremi Tinubu. Oluremi Tinubu previously opened a joint bank account also at this bank with Audrey Akande, the wife of Adegboyega Mueez Akande.

26. Bank records further disclosed that on January 6, 1990, Tinubu withdrew \$20,000 from the "NOW" account to purchase a Certificate of Deposit for \$10,000; the remaining \$10,000 was deposited into the money market account.

27. On the same day, January 6, 1990, Tinubu completed a credit application for an \$8,000 loan to purchase an automobile. Tinubu stated in the application that he resided at 7504 South Stewart and that Mueez A. Akande, his cousin, resided at 3515 Maple Lane, Hazel Crest, Illinois. Further, Tinubu stated in the application that his employer was Mobile Oil Nigeria Ltd., Fairfax, Virginia and that his take home pay was \$2,400 per month. Additionally, Tinubu stated that he had no other sources of income. He listed his wife, Oluremi S. Tinubu, as a co-applicant. The application states that she resides at the same location and her employment is listed as housewife. This loan was secured with the certificate of deposit in the amount of \$10,000 that Tinubu recently purchased.

28. A review of a Trans Union Credit report, however, showed that Tinubu resided at 7424 South Shore, Chicago, Illinois. The date of this credit report was December 28, 1989.

29. On January 8, 1990, a loan was given to Tinubu by First Heritage Bank and a check in the amount of \$8,000 was made payable to the car dealership and him for the purchase of a car.

30. A review of records from the car dealership disclosed that on January 9, 1990, Bola Tinubu purchased a 1990 Nissan 240X (VIN: JN1H536P7LW121339) for \$17,754.03 using cashier's checks purchased at First Heritage Bank from funds in his bank accounts. Tinubu provided 3515 Maple Lane, Hazel Crest, Illinois as his residence while completing paperwork at the car dealership.

31. Bank records also disclosed that on May 9, 1989, Adegboyega M. Akande opened a checking account number 263153800-2 at First Heritage Bank using social security number 577-76-9301. The account remained open until September 1990 according to records from the bank. A review of the bank statements and cashier's checks from this checking account disclosed that it remained inactive except during January 1990 and February 1990. The account records showed a deposit of a cashier's check in the amount of \$5,000. The cashier's check was purchased by Bola Tinubu on January 11, 1990, seven days after the above described \$80,000 wire transfer was received from Akande. Tinubu made the cashier's check payable to Audrey Akande and after endorsement with the names Audrey Akande and Adegboyega Akande, it was deposited into Adegboyega Mueez Akande's account.

32. Information received from the Social Security Administration and the IRS disclose that the social security number used by Adegboyega Mueez Akande to open the account at First Heritage Bank does not belong to him.

33. A review of records from the IRS disclosed the Mueez A. Akande and Audrey Akande last filed a joint income tax return in 1987 showing disposable income or adjusted gross income of \$10,500 from self-employment. Akande listed his address as 7504 South Stewart, Chicago, Illinois. The records further disclose that Akande did not file income tax returns for any year following 1987.

34. Records from First Heritage Bank disclose that in 1990, Bola Tinubu deposited \$661,000 into his individual money market account and in 1991, Tinubu deposited \$1,216,500 into the same money market account. The balance in the account is approximately \$980,967.

35. Bank records from Citibank Inc., disclosed that in January 1991, Tinubu began opening accounts at Citibank in the section known as the world-wide personal banking unit. A review of bank records disclosed that on January 25, 1991, Tinubu transferred \$560,000 from his money market account at First Heritage Bank to one of the world-wide personal accounts at Citibank.

36. Account statements from the accounts at both First Heritage Bank and Citibank were forwarded to Bola Tinubu in care of Shola Ogunbode at 6641 Morningview Court, Alexandria, Virginia.

37. Representatives from Mobil Oil were interviewed regarding Tinubu's employment status. The representatives confirmed that

Tinubu was employed by Mobil Oil Nigeria Ltd. as a treasurer. This position, however, does not involve the transfer of large amounts of money between banking institutions. Mobil Oil representatives stated that under no circumstances would Tinubu be permitted to retain money belonging to Mobil Oil in accounts bearing Tinubu's name. Finally, Mobil Oil confirmed that the corporation never had any accounts in banks in the southern suburbs of Chicago.

38. IRS tax laws require the payment of taxes for resident and non-resident aliens on interest income from deposits made into U.S. banks. A review of IRS records has disclosed that Bola Tinubu has failed to file income tax returns since 1984 despite the receipt of interest income credited to the accounts in his name.

39. On January 10, 1992, applications for seizure warrants were presented to Magistrate Judge Rosemond of the Northern District of Illinois. After considering the applications and the attached affidavits, Magistrate Judge Rosemond issued seizure warrants for accounts at First Heritage Bank and Citibank in the name of Bola Tinubu. The amount of money seized from these accounts exceeded \$1.4 million dollars.

40. Shortly thereafter, Mr. Tinubu contacted the First Heritage Bank to transfer money from his accounts and was advised that the accounts had been seized by the U.S. Treasury. Representatives from First Heritage Bank advised me of Tinubu's inquiries about his accounts. On January 13, 1992, I spoke to an individual who identified himself as Bola Tinubu at a telephone number in Nigeria that he provided to the employees of the bank.

During the course of the conversation, he advised me that he (Tinubu) knew Akande. Tinubu admitted that he had wire transferred \$100,000 to Akande's bank account in Houston and that \$80,000 of the funds used to open the bank accounts at First Heritage Bank had come from Akande. When asked to identify other accounts in his name, Tinubu stated that he had an account in Fairfax, Virginia and an account in London. Despite repeated requests for information regarding bank accounts, Tinubu denied having any additional accounts in the United States.

41. On January 14, 1992, I had another telephone conversation with the same individual who identified himself as Bola Tinubu. During this telephone conversation, Tinubu admitted to me that he knew Agbele and that he met Agbele through Akande. He further admitted that he (Tinubu) had associated with Akande and Agbele in the United States as well as Nigeria. Again during this conversation, he denied the existence of any other bank accounts in the United States.

42. The initial warrant served on Citibank seized accounts in a division referred to as Citibank, N.A. Further investigation disclosed that there was an additional banking unit known as Citibank, International with world-wide banking capabilities. Records from Citibank, International disclosed that accounts, in the name of Bola Tinubu and corporate accounts to which Tinubu had access existed in this separate international banking unit.

43. On January 24, 1992, a seizure warrant was issued in the Southern District of New York for the accounts held in the name of



Bola Tinubu by Citibank, International. Approximately \$550,000 was seized from these accounts held by Citibank, International in the name of Bola Tinubu.

44. According to records from Citibank, International, there were two additional corporate accounts held in the name of Compass Finance and Investment Company, Ltd. which were controlled by Bola Tinubu.

45. The bank records from these accounts in the international division disclosed that when Bola Tinubu opened these accounts at Citibank, International, he provided certain corporate documents from Compass Finance and Investment Company, Ltd. including documents identified as a memorandum of association and articles of association. Both corporate documents identified Mueez Adegboyega Akande and Abiodun Olasuyi Agbele as directors of Compass Finance and Investment Company, Ltd.

46. A further review of the records from Citibank, International disclosed that the funds transferred from First Heritage Bank in Illinois to Citibank, N.A. were subsequently transferred to the Citibank, International accounts held in the name of Bola Tinubu and Compass Finance and Investment Company Ltd. Funds held in international accounts may be easily transferred into the international banking system or converted into foreign currency.

47. On January 30-31, 1992, Tinubu advised agents investigating this matter that he had no business association or financial relationship with Agbele or Akande. This information

contradicted his prior statements on January 13, 1992, when he advised law enforcement officers that the money used to open the account at First Heritage Bank had come from Akande.

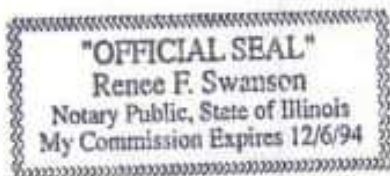
48. For the reasons set forth above, there is probable cause to believe that the funds in the accounts, held by First Heritage Bank, Citibank, N.A. and Citibank, International, in the names of Bola Tinubu and Compass Finance and Investment Company, Ltd., represent property that was involved in transactions in violation of 18 U.S.C. §§ 1956 and 1957, or is property traceable to such property or represents the proceeds of drug trafficking making the fund in the accounts forfeitable to the United States pursuant to 18 U.S.C. §981 and 21 U.S.C. §881.

49. I have read the foregoing verified complaint and this affidavit; the averments contained therein are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Kevin Moss  
Special Agent  
Internal Revenue Service

SWORN TO AND SUBSCRIBED BEFORE  
ME THIS 20th DAY OF JULY, 1993.

  
\_\_\_\_\_  
NOTARY PUBLIC



JS 44  
(Rev. 07/89)

By: s/ JOHNNY KHUOVER SHEET  
DEPUTY CLERK

U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS

August 10, 2022

The JS-44 civil cover sheet and the information on the reverse side of this form, approved by the Judicial Conference of the United States, are required for the use of the Clerk of Court for the purpose of initiating the civil docket.

I (a) PLAINTIFFS

03 JUL 26 PM 3:55  
UNITED STATES OF AMERICA

DEFENDANTS

FUNDS IN ACCT 263226700 HELD BY FIRST  
HERITAGE BANK IN THE NAME OF BOLA  
TINUBU, et al.

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF  
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT Cook  
(IN U.S. PLAINTIFF CASES ONLY)  
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

MICHAEL J. SHEPARD  
U.S. Attorney  
219 South Dearborn  
Chicago, Illinois 60604  
Attn: MARSHA A. McCLELLAN, AUSA

ATTORNEYS (IF KNOWN)

JUDGE NORDBERG 4483  
MAGISTRATE JUDGE BUCKLE

II. BASIS OF JURISDICTION

(PLACE AN X IN ONE BOX ONLY)

- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

(PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE)

DO NOT CITE ADDITIONAL STATUTES UNLESS DIVERSITY.

This court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and 1355

JUL 28 1993

V. NATURE OF SUIT

(PLACE AN X IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE /PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Motor Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Ownership & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Outstanding Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Ownership of Veteran's Benefits <input type="checkbox"/> 160 Shareholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Assault <input type="checkbox"/> 315 Assault Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employee Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Adversely Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Torts in Land <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 810 Agriculture <input checked="" type="checkbox"/> 820 Other Food & Drug <input type="checkbox"/> 825 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 830 Labor Laws <input type="checkbox"/> 840 R R & Truck <input type="checkbox"/> 850 Airline Regs <input type="checkbox"/> 860 Occupational Safety/Health <input type="checkbox"/> 890 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor Right Restraints <input type="checkbox"/> 730 Labor Right Restraining & Decree's Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Legislation <input type="checkbox"/> 791 Emp. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Writ/Order 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patents <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HRA (1995) <input type="checkbox"/> 862 Beach Lung (1923) <input type="checkbox"/> 863 DMC/DHWA (405g1) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405g2) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Patent or Copyright) <input type="checkbox"/> 871 IRS - Third Party 28 USC 7608	<input type="checkbox"/> 400 Suits Resporatory/Asbestos <input type="checkbox"/> 410 Aviation <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commodity/ICC Rules/etc <input type="checkbox"/> 460 Discrimination <input type="checkbox"/> 470 Publisher/Influential and Group Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commissions/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Emergency Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Controversy of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 810 Motion to Vacate Sentence <input type="checkbox"/> 830 Habeas Corpus <input type="checkbox"/> 835 Death Penalty <input type="checkbox"/> 840 Habeas & Other <input type="checkbox"/> 880 Civil Rights			

VI. ORIGIN

(PLACE AN X IN ONE BOX ONLY)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation

Appeal to District Judge from Magistrate Judgment  7

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER FRCP 23

DEMAND \$

Check YES only if demanded in complaint  
JURY DEMAND:  YES  NO

VIII. REMARKS

In response to  is not a refiling of a previously dismissed action  
General Rule 2.21D(2) this case  is a refiling of case number \_\_\_\_\_ of Judge \_\_\_\_\_

DATE 7-26-93

SIGNATURE OF ATTORNEY OF RECORD

*Marsha A. McClellan*

# INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS-44

## Authority For Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

**I. (a) Plaintiffs - Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved).

(c) Attorneys. Enter firm name, address, telephone number, and attorney or record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

**II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8 (a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction is based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an X in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

**III. Residence (citizenship) of Principal Parties.** This section of the JS-44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

**IV. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause.

**V. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section IV above, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

**VI. Origin.** Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate's decision.

**VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

**VIII. Related Cases.** This section of the JS-44 is used to reference relating pending cases if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS

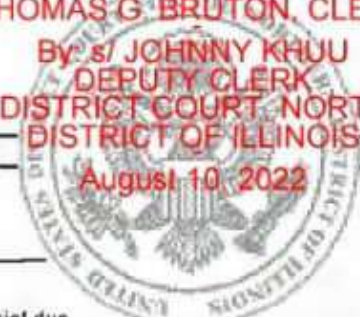
Name of Assigned Judge or Magistrate Judge	John A. Nordberg	Sitting Judge if Other Than Assigned Judge	
Case Number	93 C 4483	Date	July 27, 1993
Case Title	United States of America v. Funds In Account 263226700, et 1		

[In the following box (a) indicate the party filing the motion, e.g., plaintiff, defendant, 3rd-party plaintiff, and (b) state briefly the nature of the motion being presented.]

MOTION:

A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK

By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS



DOCKET ENTRY:

(1)	<input type="checkbox"/>	Filed motion of [use listing in "MOTION" box above]
(2)	<input type="checkbox"/>	Brief in support of motion due _____
(3)	<input type="checkbox"/>	Answer brief to motion due _____ Reply to answer brief due _____
(4)	<input type="checkbox"/>	<input type="checkbox"/> Ruling on _____ set for _____ at _____ <input type="checkbox"/> Hearing
(5)	<input checked="" type="checkbox"/>	Status hearing <input type="checkbox"/> held <input type="checkbox"/> continued to <input checked="" type="checkbox"/> set for <input type="checkbox"/> re-set for 15 Sep 93 at 9:00 a.m.
(6)	<input type="checkbox"/>	Pretrial conf. <input type="checkbox"/> held <input type="checkbox"/> continued to <input type="checkbox"/> set for <input type="checkbox"/> re-set for _____ at _____
(7)	<input type="checkbox"/>	Trial <input type="checkbox"/> Set for <input type="checkbox"/> re-set for _____ at _____
(8)	<input type="checkbox"/>	<input type="checkbox"/> Bench Trial <input type="checkbox"/> Jury Trial <input type="checkbox"/> Hearing held and continued to _____ at _____
(9)	<input type="checkbox"/>	This case is dismissed <input type="checkbox"/> without <input type="checkbox"/> with prejudice and without costs <input type="checkbox"/> by agreement <input type="checkbox"/> pursuant to <input type="checkbox"/> FRCP 4(j) (failure to serve) <input type="checkbox"/> General Rule 21 (want of prosecution) <input type="checkbox"/> FRCP 41(a)(1) <input type="checkbox"/> FRCP 41(a)(2)
(10)	<input checked="" type="checkbox"/>	[Other docket entry] Plaintiff shall notify all other parties of hearing.
(11)	<input type="checkbox"/>	[For further detail see <input type="checkbox"/> order on the reverse of <input type="checkbox"/> order attached to the original minute order form.]

<input type="checkbox"/>	No notices required, advised in open court.	RECEIVED ED-5 JUL 27 PM 3:07 RETURD	<input type="checkbox"/>	number of notices	Document # 2
<input type="checkbox"/>	No notices required.		<input type="checkbox"/>	date docketed	
<input type="checkbox"/>	Notices mailed by judge's staff.		<input type="checkbox"/>	docketing dpty. initials	
<input checked="" type="checkbox"/>	Notified counsel by telephone.		<input type="checkbox"/>	date mailed notice	
<input type="checkbox"/>	Docketing to mail notices.		<input type="checkbox"/>	mailing dpty. initials	
<input type="checkbox"/>	Mail AO 450 form.				
<input type="checkbox"/>	Copy to judge/magistrate Judge.				
<input type="checkbox"/>	courtroom deputy's initials				
<input type="checkbox"/>	Date/time received in central Clerk's Office				

(Reserved for use by the Court)

**ORDER**



Eldorado, 535 F.Supp. 65, 66 (N.D. Ill. 1982).

4. The defendant funds in these bank accounts were seized pursuant to warrants issued in this district and in the Southern District of New York. The banking institutions have retained custody of the defendant funds in these accounts on behalf of the court. The United States requests that this court direct that the warrant for seizure and monition be served by mail on these banking institutions having custody of the defendant funds and that the funds remain in these accounts during the pendency of these proceedings, until further order of this court.

WHEREFORE, the United States prays that the court grant it grant its motion, make a finding of probable cause, and direct the execution of process in the manner set forth above. A draft order is submitted herewith.

Respectfully submitted,

MICHAEL J. SHEPARD  
United States Attorney

By:



MARSHA A. McCLELLAN  
Assistant U.S. Attorney  
219 South Dearborn  
Chicago, IL 60604  
(312) 353-2814

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

93C 4483

UNITED STATES OF AMERICA,  
Plaintiff,

No.

v.

Judge JUDGE NORDBERG

FUNDS IN ACCOUNT 263226700  
HELD BY FIRST HERITAGE BANK IN  
THE NAME OF BOLA TINUBU,

FUNDS IN ACCOUNTS 39483134,  
39483396, 4650279566, 00400220,  
39936404, 39936383,  
HELD BY CITIBANK, N.A.  
IN THE NAME OF BOLA TINUBU OR  
COMPASS FINANCE & INVESTMENT CO.,

FUNDS IN ACCOUNTS 52050-89451952,  
52050-89451952, 52050-89451953  
HELD BY CITIBANK, INTERNATIONAL  
IN THE NAME OF BOLA TINUBU,

Defendants.

MAGISTRATE JUDGE BUCKLO  
A TRUE COPY-ATTEST  
THOMAS G BRUTON, CLERK  
By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS  
August 10, 2022



DOCKETED  
AUG 19 1993

ORDER

This matter is before the Court on the ex parte motion of the United States for a finding of probable cause to believe that the defendant funds in this forfeiture action is subject to forfeiture under 21 U.S.C. Section 881 and 18 U.S.C. § 981 and for an order relating to the execution of process in this matter. The Court has reviewed the verified complaint filed herein and, having been fully informed in the bases for this motion, hereby

FINDS that there is probable cause to believe that the funds described in the complaint is subject to forfeiture to the United States pursuant to 21 U.S.C. § 881 and 18 U.S.C. § 981.

Accordingly, it is hereby

4



ORDERED that the United States Marshal shall hereby have authority to execute the warrants of seizure and monition issued pursuant to Rule C of the Admiralty Rules by serving the warrants by mail on Citibank and First Heritage Bank, who shall be deemed the substitute custodians of the defendant funds for the United States Marshal, and who shall hold the defendant funds during the pendency of these proceedings until further order of court; it is further

ORDERED that, upon execution of the warrant as set forth above, the United States Marshal shall give due notice to all interested parties to appear and to show cause why the forfeiture should not be decreed.

ENTER:

  
UNITED STATES DISTRICT COURT

DATED:

August 18, 1993

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS

Name of Assigned Judge or Magistrate Judge	John A. Nordberg	Sitting Judge if Other Than Assigned Judge	
Case Number	93 C 4483	Date	August 18, 1993
Case Title	United States of America v. Funds In Account 263226700 Held By Heritage Bank in the Name of Bola Tinubu, et al		

[In the following box (a) indicate the party filing the motion, e.g., plaintiff, defendant, 3rd-party plaintiff, and (b) state briefly the nature of the motion being presented.]

MOTION:

DOCKET ENTRY:

(1)	<input checked="" type="checkbox"/>	Filed motion of [use listing in "MOTION" box above]
(2)	<input type="checkbox"/>	Brief in support of motion due _____ <span style="float: right; color: red;">AUG 20 1993</span>
(3)	<input type="checkbox"/>	Answer brief to motion due _____ Reply to answer brief due _____
(4)	<input type="checkbox"/>	Ruling on _____ at _____ Hearing _____
(5)	<input type="checkbox"/>	Status hearing <input type="checkbox"/> held <input type="checkbox"/> re-set for _____ at _____
(6)	<input type="checkbox"/>	Pretrial conf. <input type="checkbox"/> held <input type="checkbox"/> re-set for _____ at _____
(7)	<input type="checkbox"/>	Trial <input type="checkbox"/> Set for _____ at _____
(8)	<input type="checkbox"/>	<input type="checkbox"/> Bench Trial <input type="checkbox"/> Jury Trial _____ and continued to _____ at _____
(9)	<input type="checkbox"/>	This case is dismissed <input type="checkbox"/> without <input type="checkbox"/> with prejudice and without costs <input type="checkbox"/> by agreement <input type="checkbox"/> pursuant to _____ <input type="checkbox"/> FRCP 4(j) (failure to serve) <input type="checkbox"/> General Rule 21 (want of prosecution) <input type="checkbox"/> FRCP 41(a)(1) <input type="checkbox"/> FRCP 41(a)(2)
(10)	<input checked="" type="checkbox"/>	[Other docket entry] Ex parte motion of the United States for order relating to execution of seizure is granted.
(11)	<input checked="" type="checkbox"/>	[For further detail see <input type="checkbox"/> order on the reverse of <input checked="" type="checkbox"/> order attached to the original minute order form.]

A TRUE COPY-ATTEST  
 THOMAS G. BRUTON, CLERK  
 By: /s/ JOHNNY KHUU  
 DEPUTY CLERK  
 U.S. DISTRICT COURT, NORTHERN  
 DISTRICT OF ILLINOIS  
 August 10, 2022



<input type="checkbox"/>	No notices required, advised in open court	Date/time received in central Clerk's Office AUG 18 1993	1-AUSA	number of notices	Document # 5
<input type="checkbox"/>	No notices required.		AUG 18 1993	date docketed	
<input checked="" type="checkbox"/>	Notices mailed by judge's staff.		initials	docketing dpty. initials	
<input type="checkbox"/>	Notified counsel by telephone.		8/18/93	date mailed notice	
<input type="checkbox"/>	Docketing to mail notices.		initials	mailing dpty. initials	
<input type="checkbox"/>	Mail AO 450 form.				
<input type="checkbox"/>	Copy to judge/magistrate Judge.				
<input checked="" type="checkbox"/>	courtroom deputy's initials				

ORDERED that the United States Marshal shall hereby have authority to execute the warrants of seizure and monition issued pursuant to Rule C of the Admiralty Rules by serving the warrants by mail on Citibank and First Heritage Bank, who shall be deemed the substitute custodians of the defendant funds for the United States Marshal, and who shall hold the defendant funds during the pendency of these proceedings until further order of court; it is further

ORDERED that, upon execution of the warrant as set forth above, the United States Marshal shall give due notice to all interested parties to appear and to show cause why the forfeiture should not be decreed.

ENTER:

  
UNITED STATES DISTRICT COURT

DATED:

August 18, 1993

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS

Name of Assigned Judge or Magistrate Judge	John A. Nordberg	Sitting Judge if Other Than Assigned Judge	
Case Number	93 C 4483	Date	August 18, 1993
Case Title	United States of America v. Funds In Account 263226700 Held By Heritage Bank in the Name of Bola Tinubu, et al		

[In the following box (a) indicate the party filing the motion, e.g., plaintiff, defendant, 3rd-party plaintiff, and (b) state briefly the nature of the motion being presented.]

MOTION:

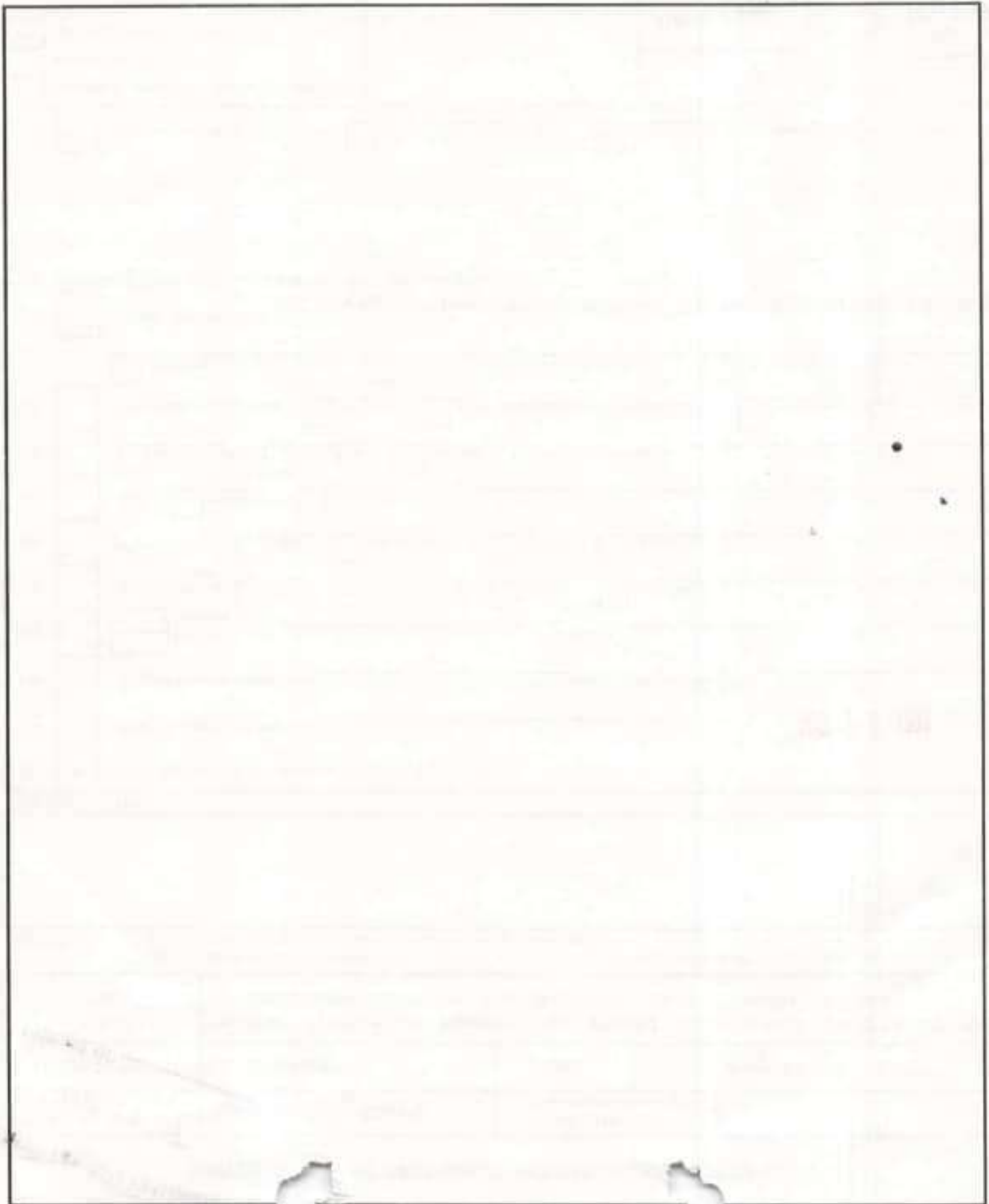
DOCKET ENTRY:

(1)	<input checked="" type="checkbox"/>	Filed motion of [use listing in "MOTION" box above]
(2)	<input type="checkbox"/>	Brief in support of motion due _____ <b>AUG 20 1993</b>
(3)	<input type="checkbox"/>	Answer brief to motion due _____ Reply to answer brief due _____
(4)	<input type="checkbox"/>	<input type="checkbox"/> Ruling on _____ at _____ <input type="checkbox"/> Hearing _____
(5)	<input type="checkbox"/>	Status hearing <input type="checkbox"/> held <input type="checkbox"/> re-set for _____ at _____ <b>By: s/ JOHNNY KHUU DEPUTY CLERK</b>
(6)	<input type="checkbox"/>	Pretrial conf. <input type="checkbox"/> held <input type="checkbox"/> re-set for _____ at _____ <b>U.S. DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS</b>
(7)	<input type="checkbox"/>	Trial <input type="checkbox"/> Set for _____ at _____ <b>August 10, 2022</b>
(8)	<input type="checkbox"/>	<input type="checkbox"/> Bench Trial <input type="checkbox"/> Jury Trial _____ and continued to _____ at _____
(9)	<input type="checkbox"/>	This case is dismissed <input type="checkbox"/> without <input type="checkbox"/> with prejudice and without costs <input type="checkbox"/> by agreement <input type="checkbox"/> pursuant to <input type="checkbox"/> FRCP 4(j) (failure to serve) <input type="checkbox"/> General Rule 21 (want of prosecution) <input type="checkbox"/> FRCP 41(a)(1) <input type="checkbox"/> FRCP 41(a)(2)
(10)	<input checked="" type="checkbox"/>	[Other docket entry] <b>Ex parte motion of the United States for order relating to execution of seizure is granted.</b>
(11)	<input checked="" type="checkbox"/>	[For further detail see <input type="checkbox"/> order on the reverse of <input checked="" type="checkbox"/> order attached to the original minute order form.]

<input type="checkbox"/>	No notices required, advised in open court	1-AUSA AUG 19 1993 [Signature] 8/18/93 [Signature]	number of notices	Document # 5
<input type="checkbox"/>	No notices required.		date docketed	
<input checked="" type="checkbox"/>	Notices mailed by judge's staff.		docketing dpty. initials	
<input type="checkbox"/>	Notified counsel by telephone.		date mailed notice	
<input type="checkbox"/>	Docketing to mail notices.		mailing dpty. initials	
<input type="checkbox"/>	Mail AO 450 form.			
<input type="checkbox"/>	Copy to judge/magistrate Judge.			
<input checked="" type="checkbox"/>	[Signature] courtroom deputy's initials	Date/time received in central Clerk's Office		

(Reserved for use by the Court)

**ORDER**





U.S. Department of Justice

United States Attorney  
Northern District of Illinois

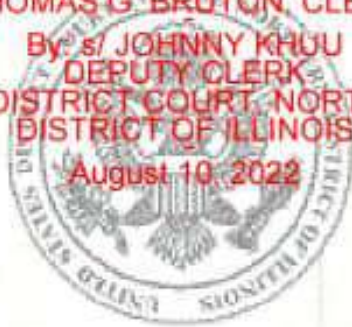
**FILED**

**AUG 19 1993**

*Dirksen Federal Building  
219 South Dearborn Street, 12th Floor  
Chicago, Illinois 60604*

H. Stuart Cunningham, Clerk  
United States District Court

**A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK  
By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS  
August 10, 2022**



August 17, 1993

H. Stuart Cunningham, Clerk  
United States District Court  
Northern District of Illinois  
219 South Dearborn Street - 20th Floor  
Chicago, Illinois 60604

Re: US V FUNDS IN 3 ACCOUNTS      93C4483  
    Nordberg, John A.

**BUCKETED  
AUG 20 1993**

Dear Mr. Cunningham:

The above-referenced matter is assigned to Assistant United States Attorney Marsha A. Mc Clellan whose telephone number is (312)353-5437.

Please direct all communication to the above-named Assistant.

This letter is not an appearance by the United States Attorney on behalf of any party, but is provided for informational purposes only.

Very truly yours,

MICHAEL J. SHEPARD  
United States Attorney

By:   
MARSHA E. GLENN  
Docket Technician

cc: AUSA Marsha A. Mc Clellan

WARRANT OF SEIZURE AND MONITION

United States District Court

FOR THE

NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

93C 4483

To the Marshal of the

Northern

District of

Illinois

WHEREAS, on the 26th day of JULY, A.D. 19 93, a Ver. Complt for Forf was filed in the United States District Court for said Northern District of Illinois, by MICHAEL J. SHEPARD, United States attorney for said District, on behalf of the United States, against

FUNDS IN ACCOUNTS 52050-89451952, 52050-89451952, 52050-89451953 HELD BY CITIBANK, INTERNATIONAL IN THE NAME OF BOLA TINUBU

JUDGE NORDBERG

MAGISTRATE JUDGE RUCKEL

and praying that all persons interested in said goods, wares, and merchandise may be cited in general and special, to answer the premises; and due proceedings being had, that the said goods, wares, and merchandise may, for the causes in said complaint mentioned, be condemned as forfeited to use of the United States.

YOU ARE THEREFORE HEREBY COMMANDED To attach the said goods, wares, and merchandise, and to detain the same in your custody until further order of said Court respecting the same; and to give notice by publication in the Chicago Daily Law Bulletin to all persons claiming the same, or knowing or having anything to say why the same should not be condemned as forfeited to the use of the United States, pursuant to the prayer of said complaint, that they be and appear before the said Court, at the city of Chicago within ten days after giving of notice, if the same shall be a day of jurisdiction thereafter, then and there to interpose a claim for the same and to make their allegations in that behalf and that they file and serve their answers within twenty days after the filing of said claims. And what you have done in the premises, do you then and there make return thereof, together with this writ.

WITNESS THE HONORABLE		UNITED STATES DISTRICT JUDGE AT	
DATE	CLERK	F. STUART CUNNINGHAM	
JUL 29 1993	(BY) DEPUTY CLERK	<i>[Signature]</i>	
Returnable _____ days after issue.			
<b>UNITED STATES MARSHAL'S RETURN</b>			
DISTRICT		DATE THE WITHIN WRIT WAS RECEIVED AND EXECUTED	
Northern District of Illinois		8-24-93	
U.S. MARSHAL		(BY) DEPUTY MARSHAL	
<i>[Signature]</i>		<i>[Signature]</i>	

WARRANT OF SEIZURE AND MONITION

United States District Court

FOR THE

NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

93C 4488

To the Marshal of the Northern District of Illinois

WHEREAS, on the 26th day of JULY, A.D. 19 93, a Ver. Complt for Forfeiture was filed in the United States District Court for said Northern District of Illinois, by MICHAEL J. SHEPARD, United States attorney for said District, on behalf of the United States, against

FUNDS IN ACCOUNTS 39483134, 39483396, 4650279566, 00400220, 39936404, 39936383, HELD BY CITIBANK, N.A. IN THE NAME OF BOLA TINUBU OR COMPASS FINANCE & INVESTMENT CO.

~~W. E. NORDBERG~~

MAGISTRATE JUDGE RUCKLA

and praying that all persons interested in said goods, wares, and merchandise may be cited in general and special, to answer the premises; and due proceedings being had, that the said goods, wares, and merchandise may, for the causes in said complaint mentioned, be condemned as forfeited to use of the United States.

YOU ARE THEREFORE HEREBY COMMANDED To attach the said goods, wares, and merchandise, and to detain the same in your custody until further order of said Court respecting the same; and to give notice by publication in the Chicago Daily Law Bulletin to all persons claiming the same, or knowing or having anything to say why the same should not be condemned as forfeited to the use of the United States, pursuant to the prayer of said complaint, that they be and appear before the said Court, at the city of Chicago within ten days after giving of notice, if the same shall be a day of jurisdiction thereafter, then and there to interpose a claim for the same and to make their allegations in that behalf and that they file and serve their answers within twenty days after the filing of said claims. And what you have done in the premises, do you then and there make return thereof, together with this writ.

WITNESS THE HONORABLE		UNITED STATES DISTRICT JUDGE AT	
DATE JUL 26 1993	CLERK	H. STUART CUNNINGHAM	
	(BY) DEPUTY CLERK	<i>[Signature]</i>	
Returnable _____ days after issue.			
<b>UNITED STATES MARSHAL'S RETURN</b>			
DISTRICT		DATE THE WITHIN WRIT WAS RECEIVED AND EXECUTED	
Northern District of Illinois		8-24-93	
U.S. MARSHAL		(BY) DEPUTY MARSHAL	
<i>[Signature]</i>		<i>[Signature]</i>	



LOGGED OUT

U.S. Department of Justice  
United States Marshals Service

PROCESS RECEIPT AND RETURN

See Instructions for "Process by the U.S. Marshal" on the reverse of this form.

PLAINTIFF  
UNITED STATES OF AMERICA

DEFENDANT  
BOLA TINUBU, et al.

SERVE AT  
NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN  
John Lopez, Esquire - CITIBANK, N.A.

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)  
666 5th Avenue - 6th Floor  
New York, New York 10103

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:  
MICHAEL J. SHEPARD  
U.S. Attorney  
219 South Dearborn  
Chicago, IL 60604  
Attn: MARSHA A. McCLELLAN, AUSA

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

H. Stuart Cunningham, Clerk  
United States District Court

DOCKETED  
SEP. 07 1993

Signature of Attorney or other Originator requesting service on behalf of:  
Marsha A. McClellan, AUSA

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated.  
(Sign only first USM 285 if more than one USM 285 is submitted)

I hereby certify and return that I have personally served, have legal evidence of service, or have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below)

Name and title of individual served (if not shown above)

Address (complete only if different than shown above)

Date of Service: 8-24-93  
Time: 4:30 pm

Signature of U.S. Marshal or Deputy: [Signature]

Service Fee, Total Mileage Charges, Forwarding Fee, Total Charges, Advance Deposits, Amount owed to U.S. Marshal or U.S. District Court, Amount of Refund

REMARKS:  
Mailed 8-24-93  
P 140 816 739  
Receipt dated 8-26-93

A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK  
By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS  
August 10, 2022

**INSTRUCTIONS FOR SERVICE OF  
PROCESS BY THE U.S. MARSHAL**

Please type or print legibly, insuring readability of all copies. **DO NOT DETACH ANY COPIES.**

Submit one complete set of this form (USM-285) and one copy of each writ for each individual, company, corporation, etc., to be served or property to be seized or condemned. The applicable fees for such service(s) (T28, USC Sec. 1921 establishes the fees for service of process by the U.S. Marshal) may be required prior to said service.

For service of any process upon an officer or agent of the United States Government, submit a copy of the writ and a set of Form USM-285 for each officer or agent upon whom service is desired. Submit three (3) additional copies of the writs for service upon the Government of the United States. The U.S. Marshal will serve one (1) upon the U.S. Attorney and will forward two (2) to the Attorney General of the United States. (When the applicable box is checked, completion of the final signature block by the U.S. Marshal or his Deputy always certifies service on the U.S. Attorney and the Attorney General, regardless of whether other defendants on the writ were served.) Failure to provide any of the copies will delay service of the writ.

Complete all entries above the double line. Mark all applicable check boxes and use the "Special Instructions" to advise of any information that will assist the U.S. Marshal in expediting service.

If more than one writ and USM-285 is submitted on a single case, the U.S. Marshal will receipt for all of them on the first USM-285. You will receive for your records the last (No. 5) "Acknowledgment of Receipt" copy for all the USM-285 forms you submit. When the writ is served, you will receive the No. 3 Notice of Service copy. This copy will be identical to the return to the Clerk of the Court.

Upon completion of all services (if the Marshals fees were not requested or tendered in advance or if additional fees are indicated), you will receive a "Billing Statement" (copy 4 of USM-285) from the United States Marshal. (NOTE: Copy 4 should be returned, by you, to the U.S. Marshal, together with your payment of the amount owed.)

Additional supplies of the USM-285 may be obtained from the Clerk of the U.S. District Court or U.S. Marshal, without cost.

*[Handwritten scribbles]*

*[Handwritten notes: EP-VG-8, PETITION, EP-VG-8, dated 8-2-82]*

**LOGGED OUT**

U.S. Department of Justice  
United States Marshals Service

**PROCESS RECEIPT AND RETURN**

See Instructions for *Use of Process by the U.S. Marshal*  
on the reverse of this form

PLAINTIFF  
**UNITED STATES OF AMERICA**

COURT CASE NUMBER  
**93 C 4483 - J. NORDBERG**

DEFENDANT  
**BOLA TINUBU, et al.**

TYPE OF PROCESS  
**Warrant & Complaint**

**SERVE** → **AT** { NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN  
**Patrick S. Coffey, GARDNER, CARTON & DOUGLAS**  
ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)  
**321 North Clark  
Chicago, Illinois 60610**

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:  
**MICHAEL J. SHEPARD  
U.S. Attorney  
219 South Dearborn  
Chicago, IL 60604  
Attn: MARSHA A. McCLELLAN, AUSA**

Number of process to be served with this Form - 285  
Number of parties to be served in this case  
Check for service on U.S.A.

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

SEP 7 1993  
DOCKETED  
SEP 07 1993  
H. Stuart Cunningham, Clerk  
United States District Court

Signature of Attorney or other Originator requesting service on behalf of:  
*Marsha A. McClellan*  
**Marsha A. McClellan, AUSA**

PLAINTIFF  
 DEFENDANT  
TELEPHONE NUMBER  
**(312) 353-2814**  
DATE  
**7-30-93**

**SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE**

I acknowledge receipt for the total number of process indicated.  
(Sign only first USM 285 if more than one USM 285 is submitted)

Total Process: **4**  
District of Origin: \_\_\_\_\_  
District to Serve: \_\_\_\_\_  
Signature of Authorized USMS Deputy or Clerk: \_\_\_\_\_  
Date: **AUG 24 1993**

I hereby certify and return that I  have personally served,  have legal evidence of service,  have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below)

Name and title of individual served (if not shown above):  
**THOMAS G BRUTON, CLERK**

Address (complete only if different than shown above):  
**By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS  
August 10, 2022**

A person of suitable age and discretion then residing in the defendant's usual place of abode.

Date of Service: **8-26-93** Time: **10:30** am/pm  
Signature of U.S. Marshal or Deputy: *[Signature]*

Service Fee: \_\_\_\_\_ Total Mileage Charges (including endeavors): \_\_\_\_\_ Forwarding Fee: \_\_\_\_\_  
Amount owed to U.S. Marshal or \_\_\_\_\_ Amount of Refund: \_\_\_\_\_

REMARKS: **AT Request of Patrick Coffey's office A Messenger was dispatched to USMS office to expedite service**

**LOGGED OUT**

**ENTERED SAMS**

U.S. Department of Justice  
United States Marshals Service

**PROCESS RECEIPT AND RETURN**

See Instructions for "Service of Process by the U.S. Marshal" on the reverse of this form.

PLAINTIFF <b>UNITED STATES OF AMERICA</b>	COURT CASE NUMBER <b>93 C 4483 - J. NORDBERG</b>
DEFENDANT <b>BOLA TINUBU, et al.</b>	TYPE OF PROCESS <b>Warrant &amp; Complaint</b>

**SERVE** → **AT** { NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN

**FIRST HERITAGE BANK**  
ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)  
**4101 West 183rd Street  
Country Club Hills, IL 60478**

**A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK**

**By: s/ JOHNNY KHUU  
DEPUTY CLERK**

**U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS**

**August 10, 2022**

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:

<b>MICHAEL J. SHEPARD</b> U.S. Attorney 219 South Dearborn Chicago, IL 60604 Attn: <b>MARSHA A. McCLELLAN, AUSA</b>	Number of served with _____ Number of served in this _____ Check for service on U.S.A. _____
---	--

**FILED**  
**SEP 4 1993**  
H. Stuart Cunningham, Clerk  
United States District Court

**DOCKETED**  
**SEP 07 1993**

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):  
Fold

Signature of Attorney or other Originator requesting service on behalf of: Marsha A. McClellan, AUSA  PLAINTIFF  DEFENDANT

TELEPHONE NUMBER: **(312) 353-2814** DATE: **7-30-93**

**SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE**

I acknowledge receipt for the total number of process indicated. (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process <b>2</b>	District of Origin No. _____	District to Serve No. _____	Signature of Authorized USMS Deputy or Clerk <b>[Signature]</b>	Date <b>AUG 24 1993</b>
---	---------------------------	---------------------------------	--------------------------------	--	----------------------------

I hereby certify and return that  I have personally served,  I have legal evidence of service,  I have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below)

Name and title of individual served (if not shown above): \_\_\_\_\_

Address (complete only if different than shown above): \_\_\_\_\_

<input type="checkbox"/> A person of suitable age and discretion then residing in the defendant's usual place of abode.
Date of Service: <b>8-24-93</b> Time: <b>4:30 pm</b>
Signature of U.S. Marshal or Deputy: <b>[Signature]</b>

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal or	Amount of Refund
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REMARKS:  
**Mailed 8-24-93**  
**P140816738**  
**Receipt dated 8-25-93**

**9**

ENTERED 8AM

LOGGED OUT

93 C 1483 - G. ROSENBERG  
WITMAN & COMPANY

UNITED STATES OF AMERICA  
BOA NUMBER 22 51

**INSTRUCTIONS FOR SERVICE OF  
PROCESS BY THE U.S. MARSHAL**

Please type or print legibly, insuring readability of all copies. **DO NOT DETACH ANY COPIES.**

Submit one complete set of this form (USM-285) and one copy of each writ for each individual, company, corporation, etc., to be served or property to be seized or condemned. The applicable fees for such service(s) (T28, USC Sec. 1921 establishes the fees for service of process by the U.S. Marshal) may be required prior to said service.

For service of any process upon an officer or agent of the United States Government, submit a copy of the writ and a set of Form USM-285 for each officer or agent upon whom service is desired. Submit three (3) additional copies of the writs for service upon the Government of the United States. The U.S. Marshal will serve one (1) upon the U.S. Attorney and will forward two (2) to the Attorney General of the United States. (When the applicable box is checked, completion of the final signature block by the U.S. Marshal or his Deputy always certifies service on the U.S. Attorney and the Attorney General, regardless of whether other defendants on the writ were served.) Failure to provide any of the copies will delay service of the writ.

Complete all entries above the double line. Mark all applicable check boxes and use the "Special Instructions" to advise of any information that will assist the U.S. Marshal in expediting service.

If more than one writ and USM-285 is submitted on a single case, the U.S. Marshal will receipt for all of them on the first USM-285. You will receive for your records the last (No. 5) "Acknowledgment of Receipt" copy for all the USM-285 forms you submit. When the writ is served, you will receive the No. 3 Notice of Service copy. This copy will be identical to the return to the Clerk of the Court.

Upon completion of all services (if the Marshals fees were not requested or tendered in advance or if additional fees are indicated), you will receive a "Billing Statement" (copy 4 of USM-285) from the United States Marshal. (NOTE: Copy 4 should be returned, by you, to the U.S. Marshal, together with your payment of the amount owed.)

Additional supplies of the USM-285 may be obtained from the Clerk of the U.S. District Court or U.S. Marshal, without cost.

*Handwritten notes and scribbles in the bottom left corner.*

*Handwritten notes in the bottom right corner, including "ER-200" and "ER-200" repeated.*

WARRANT OF SEIZURE AND MONITION

United States District Court

FOR THE

NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

30 4483

To the Marshal of the

Northern

District of

Illinois

WHEREAS, on the 26th day of JULY, A.D. 19 93, a Ver. Complt for Forf. was filed in the United States District Court for said Northern District of Illinois, by MICHAEL J. SHEPARD, United States attorney for said District, on behalf of the United States, against

FUNDS IN ACCOUNT 263226700 HELD BY FIRST HERITAGE BANK IN THE NAME OF BOLA TINUBU

COPIES DESTROYED  
MAGISTRATE JUDGE RICKER

and praying that all persons interested in said goods, wares, and merchandise may be cited in general and special, to answer the premises; and due proceedings being had, that the said goods, wares, and merchandise may, for the causes in said complaint mentioned, be condemned as forfeited to use of the United States.

YOU ARE THEREFORE HEREBY COMMANDED To attach the said goods, wares, and merchandise, and to detain the same in your custody until further order of said Court respecting the same; and to give notice by publication in the Chicago Daily Law Bulletin to all persons claiming the same, or knowing or having anything to say why the same should not be condemned as forfeited to the use of the United States, pursuant to the prayer of said complaint, that they be and appear before the said Court, at the city of Chicago within ten days after giving of notice, if the same shall be a day of jurisdiction thereafter, then and there to interpose a claim for the same and to make their allegations in that behalf and that they file and serve their answers within twenty days after the filing of said claims. And what you have done in the premises, do you then and there make return thereof, together with this writ.

WITNESS THE HONORABLE		UNITED STATES DISTRICT JUDGE AT	
DATE	CLERK	H. STUART CUNNINGHAM	
JUL 26 1993	(BY) DEPUTY CLERK	<i>Billie Simpson</i>	
Returnable _____ days after issue.			
<b>UNITED STATES MARSHAL'S RETURN</b>			
DISTRICT	DATE THE WITHIN WRIT WAS RECEIVED AND EXECUTED		
Northern District of Illinois	8-24-93		
U.S. MARSHAL	(BY) DEPUTY MARSHAL		
<i>Mervin Luter</i>	<i>Kenneth Randolph</i>		

**ENTERED SAMS**

U.S. Department of Justice  
United States Marshals Service

**PROCEEDING RECEIPT AND RETURN**  
See Instructions for "Service of Process by the U.S. Marshal"  
on the reverse of this form.

PLAINTIFF  
**UNITED STATES OF AMERICA**

COURT CASE NUMBER  
**93 C 4483 - J. NORDBERG**

DEFENDANT  
**BOLA TINUBU, et al.**

TYPE OF PROCESS  
**Warrant & Complaint**

**SERVE** → **AT** { NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN  
**KEVIN MOSS, IRS**  
ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)  
**230 South Dearborn  
Chicago, IL 60604**

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:  
 **MICHAEL J. SHEPARD  
U.S. Attorney  
219 South Dearborn  
Chicago, IL 60604  
Attn: MARSHA A. McCLELLAN, AUSA**

Number of process to be served with this Form - 285  
Number of parties to be served in this case  
Check for service on U.S.A.

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):  
Fold

**DOCKETED**  
**SEP 07 1993**  
1993 AUG 31 PM 2:57  
FOLD

Signature of Attorney or other Originator requesting service on behalf of:  
*Marsha A. McClellan*  
**Marsha A. McClellan, AUSA**

PLAINTIFF  
 DEFENDANT

TELEPHONE NUMBER  
**(312) 353-2814**

DATE  
**7-30-93**

**SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE**

I acknowledge receipt for the total number of process indicated.  
(Sign only first USM 285 if more than one USM 285 is submitted)

Total Process <b>104</b>	District of Origin <b>No. 24</b>	District to Serve <b>No. 21</b>	Signature of Authorized USMS Deputy or Clerk <i>AD</i>	Date <b>8/24/93</b>
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I hereby certify and return that I  have personally served,  have legal evidence of service,  have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below)

Name and title of individual served (if not shown above)

A person of suitable age and discretion then residing in the defendant's usual place of abode.

Address (complete only if different than shown above)

Date of Service <b>8/25/93</b>	Time <b>2:10</b>	am <b>pm</b>
-----------------------------------	---------------------	-----------------

Signature of U.S. Marshal or Deputy  
*Debra A. Lottman*

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Amount owed to U.S. Marshal or	Amount of Refund
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**A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK  
By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS**

REMARKS:

**August 10, 2022**

**10**

ENTERED 2/28/82

**INSTRUCTIONS FOR SERVICE OF  
PROCESS BY THE U.S. MARSHAL**

Please type or print legibly, insuring readability of all copies. DO NOT DETACH ANY COPIES.

Submit one complete set of this form (USM-285) and one copy of each writ for each individual, company, corporation, etc., to be served or property to be seized or condemned. The applicable fees for such service(s) (T28, USC Sec. 1921 establishes the fees for service of process by the U.S. Marshal) may be required prior to said service.

For service of any process upon an officer or agent of the United States Government, submit a copy of the writ and a set of Form USM-285 for each officer or agent upon whom service is desired. Submit three (3) additional copies of the writs for service upon the Government of the United States. The U.S. Marshal will serve one (1) upon the U.S. Attorney and will forward two (2) to the Attorney General of the United States. (When the applicable box is checked, completion of the final signature block by the U.S. Marshal or his Deputy always certifies service on the U.S. Attorney and the Attorney General, regardless of whether other defendants on the writ were served.) Failure to provide any of the copies will delay service of the writ.

Complete all entries above the double line. Mark all applicable check boxes and use the "Special Instructions" to advise of any information that will assist the U.S. Marshal in expediting service.

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Additional supplies of the USM-285 may be obtained from the Clerk of the U.S. District Court or U.S. Marshal, without cost.

RECEIVED U.S. MARSHAL [Signature]		DATE [Date]	
NAME OF DEBTOR [Name]	NAME OF CREDITOR [Name]	COURT [Court Name]	COUNTY [County]
ADDRESS [Address]	CITY [City]	STATE [State]	ZIP [ZIP]
TYPE OF SERVICE [Type]	METHOD OF SERVICE [Method]	DATE OF SERVICE [Date]	BY WHOM SERVED [Name]
FEE PAID [Amount]	RECEIPT NO. [Number]	CASE NO. [Number]	JUDGE [Name]

U.S. DISTRICT COURT



A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK

By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS

August 10, 2022



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 FUNDS IN ACCOUNT 263226700 )  
 HELD BY FIRST HERITAGE BANK IN )  
 THE NAME OF BOLA TINUBU, )  
 )  
 FUNDS IN ACCOUNTS 39483134, )  
 39483396, 4650279566, 00400220, )  
 39936404, 39936383, )  
 HELD BY CITIBANK, N.A. )  
 IN THE NAME OF BOLA TINUBU OR )  
 COMPASS FINANCE & INVESTMENT CO., )  
 )  
 FUNDS IN ACCOUNTS 52050-89451952, )  
 52050-89451952, 52050-89451953 )  
 HELD BY CITIBANK, INTERNATIONAL )  
 IN THE NAME OF BOLA TINUBU, )  
 )  
 Defendants. )

No. 93 C 4483

Judge Nordberg

**FILED**

SEP 15 1993

H. STUART CUNNINGHAM, CLERK  
UNITED STATES DISTRICT COURT

**DOCKETED**

SEP 21 1993

STIPULATION AND COMPROMISE SETTLEMENT  
OF CLAIMS TO THE FUNDS HELD BY HERITAGE BANK AND CITIBANK

The United States of America, by its attorney, Michael J. Shepard, United States Attorney for the Northern District of Illinois and claimants, Bola A. Tinubu, K.O. Tinubu (individually and on behalf of the Tinubu Family) and Alhaji Mogati, by their attorney, Patrick S. Coffey, stipulate and agree as follows:

1. The United States filed a Verified Complaint for Forfeiture against the funds in the above-captioned defendant accounts because there was probable cause to believe that the property represented proceeds of narcotics trafficking or was property involved in financial transactions in violation of 18

11

U.S.C. §§ 1956 and 1957 and therefore was forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6) and 81 U.S.C. § 981. The funds in the defendant accounts were seized initially by seizure warrants. The claimants dispute that there was probable cause for these seizures.

2. The defendant accounts held by Citibank and Heritage Bank are in the name of Compass Financial and Bola Tinubu. Ownership interests in the funds in these defendant accounts have been asserted on behalf of Bola A. Tinubu, K.O. Tinubu (individually and on behalf of the Tinubu Family) and Alhajá Mogati, (hereafter "the claimants"). The claimants warrant that they have exclusive right, title and interest to the defendant property seized. *pc*

3. The United States and the claimants agree to settle and to compromise this action on the terms described below.

4. The parties agree that the funds held by Citibank shall be released to K.O. Tinubu and the action filed against these funds held in the accounts by Citibank shall be dismissed with prejudice.

5. The parties further agree that \$460,000 from the defendant account held by Heritage Bank in the name of Bola Tinubu shall be forfeited by the United States and disposed of according to law. The funds remaining in the account shall be released to K. O. Tinubu.

6. The claimants, Bola A. Tinubu, K.O. Tinubu (individually and on behalf of the Tinubu Family) and Alhajá Mogati, hereby release and forever discharge the United States, its officers, agents, servants, and employees, its heirs, successors, or assigns *pc*

from any and all actions, causes of action, suits, proceedings, debts, dues, contracts, judgments, damages, claims, and/or demands whatsoever in law or equity which the claimants, their heirs, successors, or assigns ever had, now have or may have in the future in connection with the investigation, seizure, detention, forfeiture, disposition and release of the defendant property.

7. The parties further agree that this Court will retain jurisdiction of this matter for the purposes of implementing this settlement agreement.

8. The United States and the claimants agree to bear their own costs and attorney's fees.

9. The United States and the claimants state that they have read this agreement and understand this agreement and that they intend to be bound by its terms and conditions.

AGREED:

MICHAEL J. SHEPARD  
United States Attorney

By: Marsha A. McClellan  
Marsha A. McClellan  
Assistant United States Attorney  
219 S. Dearborn Street  
Chicago, Illinois 60604

Patrick S. Coffey  
Patrick S. Coffey  
Attorney for Claimants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 FUNDS IN ACCOUNT 263226700 )  
 HELD BY FIRST HERITAGE BANK IN )  
 THE NAME OF BOLA TINUBU, )  
 )  
 FUNDS IN ACCOUNTS 39483134, )  
 39483396, 4650279566, 00400220, )  
 39936404, 39936383, )  
 HELD BY CITIBANK, N.A. )  
 IN THE NAME OF BOLA TINUBU OR )  
 COMPASS FINANCE & INVESTMENT CO., )  
 )  
 FUNDS IN ACCOUNTS 52050-89451952, )  
 52050-89451952, 52050-89451953 )  
 HELD BY CITIBANK, INTERNATIONAL )  
 IN THE NAME OF BOLA TINUBU, )  
 )  
 Defendants. )

No. 93 C 4483  
Judge Nordberg

A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK  
By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS



DOCKETED  
SEP 21 1993

SETTLEMENT ORDER OF CLAIMS TO FUNDS  
HELD BY HERITAGE BANK AND CITIBANK

This matter coming before the Court upon the motion of the the United States and the claimants, Bola A. Tinubu, K.O. Tinubu (individually and on behalf of the Tinubu Family) and Alhaji Mogati, by their attorney, Patrick S. Coffey, the Court finds as follows:

(a) The United States filed a Verified Complaint for Forfeiture against the funds in the above-captioned defendant accounts because there was probable cause to believe that the property represented proceeds of narcotics trafficking or was

12

property involved in financial transactions in violation of 18 U.S.C. §§ 1956 and 1957 and therefore was forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6) and 81 U.S.C. § 981. The funds in the defendant accounts were seized initially by seizure warrants. The claimants dispute that there was probable cause for these seizures;

(b) The defendant accounts held by Citibank and Heritage Bank are in the name of Compass Financial and Bola Tinubu. Ownership interests in the funds in these defendant accounts have been asserted on behalf of Bola A. Tinubu, K.O. Tinubu (individually and on behalf of the Tinubu Family) and Alhaji Mogaji, (hereafter "the claimants"). The claimants warrant that they have exclusive right, title and interest to the defendant property seized;

(c) The Court has jurisdiction over the defendant accounts and over the subject matter of this action;

(d) A verified complaint was filed on July 26, 1993

(e) Warrants of seizure and monition were served by the United States Marshal's Service;

(f) The United States and the claimants agree to settle and to compromise this action;

(g) The parties agree to a settlement of the action against the defendant accounts as set forth in the Stipulation for Compromise Settlement attached to this Order and incorporated herein. It is agreed by the parties that the funds held by Citibank (Account Nos., 39483134, 39483396, 4650279566, 00400220, 39936404 and 39936383, Citibank International Account Nos. 52050-

89451951 (and/or 52050-89651951), 52050-89451952 (and/or 52050-89651952), and 52050-89451953 (and/or 52050-89651953)) shall be released and the action filed against these funds held in the accounts by Citibank shall be dismissed with prejudice;

(h) The parties further agree that \$460,000 from the defendant account held by Heritage Bank in the name of Bola Tinubu shall be forfeited by the United States when publication has been completed and those funds shall remain in the account First Heritage Bank until disposed of according to law by further order of this Court. The additional funds remaining in the account in excess of the \$460,000 shall be released accordingly, it is hereby

ORDERED that the funds in the above named accounts and any accounts held by Citibank or its related entities on behalf of Bola Tinubu or companies over which Bola Tinubu has control shall be released and the action filed against these funds held in these accounts by Citibank shall be dismissed with prejudice; it is further

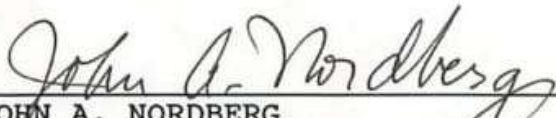
ORDERED that the funds in the defendant account held by First Heritage in excess of \$460,000 shall be released and the action, as it relates to these funds, filed against the account by First Heritage shall be dismissed; it is further

ORDERED that the funds in the defendant account held by First Heritage in the amount of \$460,000 shall be maintained in the defendant account until further order of this Court; it is further

ORDERED that the Stipulation for Compromise Settlement and Hold Harmless Agreement and its terms and conditions are made a

part of this Settlement Order; it is further

ORDERED that the Court shall retain jurisdiction over this action in order to implement and enforce the terms of the attached Stipulation.

  
\_\_\_\_\_  
JOHN A. NORDBERG  
United States District Judge

Dated: September 15, 1993

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS

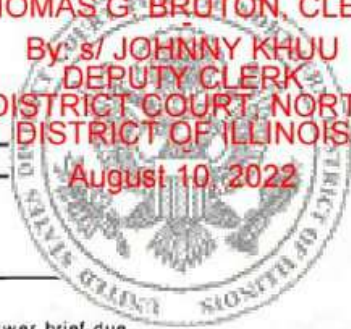
Name of Assigned Judge or Magistrate Judge	John A. Nordberg	Sitting Judge if Other Than Assigned Judge	
Case Number	93 C 4483	Date	September 15, 1993
Case Title	USA v. 263226700		

MOTION:

[In the following box (a) indicate the party filing the motion, e.g., plaintiff, defendant, 3rd-party plaintiff, and (b) state briefly the nature of the motion being presented.]

A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK

By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS



DOCKET ENTRY:

(1) Filed motion of [use listing in "MOTION" box above]

(2) Brief in support of motion due \_\_\_\_\_

(3) Answer brief to motion due \_\_\_\_\_ Reply to answer brief due \_\_\_\_\_

(4)  Ruling on \_\_\_\_\_ set for \_\_\_\_\_ at \_\_\_\_\_  
 Hearing

(5)  Status hearing  held  continued to \_\_\_\_\_ set for \_\_\_\_\_ re-set for 04 Oct 93 at 9:00 a.m.

(6) Pretrial conf.  held  continued to \_\_\_\_\_ set for \_\_\_\_\_ re-set for \_\_\_\_\_ at \_\_\_\_\_

(7) Trial  Set for \_\_\_\_\_ re-set for \_\_\_\_\_ at \_\_\_\_\_

(8)  Bench Trial  Jury Trial  Hearing held and continued to \_\_\_\_\_ at \_\_\_\_\_

(9) This case is dismissed  without  with prejudice and without costs  by agreement  pursuant to  
 FRCP 4(j) (failure to serve)  General Rule 21 (want of prosecution)  FRCP 41(a)(1)  FRCP 41(a)(2)

(10)  [Other docket entry] Enter Settlement Order of claims to funds held by Heritage Bank and Citibank. Patrick Coffey granted leave to file an appearance on behalf of Claimants Bola Tinubu, K.O. Tinubu and Alhaji Mogati.

(11)  [For further detail see  order on the reverse of  order attached to the original minute order form.]

<input type="checkbox"/> No notices required, advised in open court.	ED-5 RECEIVED FOR DOCKETING 93 SEP 17 PM 12:48 SEP 2 01993 SVB	<input type="checkbox"/> No notices required.	number of notices	Document # 13	
<input type="checkbox"/> Notices mailed by judge's staff.		<input type="checkbox"/> Notified counsel by telephone.	date docketed		
<input checked="" type="checkbox"/> Docketing to mail notices.		<input type="checkbox"/> Mail AO 450 form.	date docketed		docketing dpty. initials
<input type="checkbox"/> Copy to judge/magistrate Judge.		<input type="checkbox"/> courtroom deputy's initials	date mailed notice		mailing dpty. initials
<input type="checkbox"/> Date/time received in central Clerk's Office					



(Reserved for use by the Court)

**ORDER**

[A large rectangular area containing a grid of lines and boxes, intended for a court order. The grid is mostly empty, with some faint, illegible markings and two circular punch holes at the bottom center.]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**FILED**

SEP 15 1993


In the Matter of *UNITED STATES V. FUNDS IN ACCOUNT  
263226700, et al.*

H. STUART CUNNINGHAM  
CLERK, U. S. DISTRICT COURT

Case Number: *93 C 4483*

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

*CLAIMANTS SOLA A. TINUBU, K.O. TINUBU AND ALHADI MOGATI*

(A)		(B)	
SIGNATURE	<i>[Signature]</i>	SIGNATURE	<b>FILED</b>
NAME	<i>PATRICK S. COFFEY</i>	NAME	
FIRM	<i>GARDNER, CARTON &amp; DOUGLAS</i>	FIRM	<i>SEP 15 1993</i>
STREET ADDRESS	<i>321 N. CLARK ST.</i>	STREET ADDRESS	
CITY/STATE/ZIP	<i>CHICAGO, IL 60610</i>	CITY/STATE/ZIP	<i>H. STUART CUNNINGHAM, CLERK UNITED STATES DISTRICT COURT</i>
TELEPHONE NUMBER	<i>(312) 245-8711</i>	TELEPHONE NUMBER	<b>DOCKETED</b>
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	<i>90304</i>	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	<i>SEP 21 1993</i>
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
<p><b>A TRUE COPY-ATTEST</b> <b>THOMAS G. BRUTON, CLERK</b> By: <i>s/ JOHNNY KHUU</i> <b>DEPUTY CLERK</b> <b>U.S. DISTRICT COURT, NORTHERN</b> <b>DISTRICT OF ILLINOIS</b> <b>August 10, 2022</b></p> 		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER		TELEPHONE NUMBER	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

PLEASE COMPLETE IN ACCORDANCE WITH INSTRUCTIONS ON REVERSE.

INSTRUCTIONS FOR COMPLETING APPEARANCE FORM

1. General Information

General Rule 3.15 provides that once an attorney has filed an appearance form on behalf of a party, no additional appearances or substitutions may be made without leave of Court. The Rule also provides that the attorney may not withdraw without leave of Court. Therefore, if more than one attorney is going to represent the party or parties shown on the front of this form, each should complete the attorney appearance section of the form.

This form is designed to permit the filing of appearances by up to four attorneys who represent the same party or parties. If more than four attorneys representing the same party or parties wish to file appearances, additional forms should be used and the letters (A), (B), (C), (D) indicating the attorneys should be altered to (E), (F), (G), (H), respectively for the fifth through the eighth attorneys, etc.

2. Listing of Parties for Whom the Attorney is Appearing

The name of each of the parties represented by the attorney(s) filing the appearance are to be listed on the lines immediately below the words "Appearance(s) are hereby filed by the undersigned as attorney(s) for:". The type of party, e.g., plaintiff, defendant, third party plaintiff, should follow each party. If all of the parties are of the same type, e.g., all parties represented are plaintiffs, then the type of party can be shown at the end of the listing of parties.

3. Completing Attorney Information

The information requested should be completed for each attorney filing an appearance. Where two or more attorneys are from the same firm, only the first listed from the firm need complete the information for firm name, street address and city/state/ZIP. The others may indicate "Same as (letter designation of first attorney)."

4. Identification Number

Attorneys who are members of the Illinois bar should enter the identification number issued to them by the Illinois Attorney Registration and Disciplinary Commission (A.R.D.C.). Attorneys who are not members of the Illinois bar should leave this item blank.

5. Attorney (A) and Notices

Where more than one attorney is listed on the appearance form, all listed will be entered on the docket of the Clerk as

attorneys of record. However, notices will only be mailed to the attorney shown in box (A) on the form except where local counsel has been designated pursuant to General Rule 3.13 (see below). The attorney is responsible for notifying all other attorneys included on the form of the matter noticed.

Where appearances are filed on behalf of attorneys representing a state or local government, e.g., States Attorney, Corporation Counsel, the persons filing the appearance may wish to list the name of the assistant who is in active charge of the case in box (A) and the appearance of the head of the agency, e.g., attorney general, corporation counsel, or any other assistant assigned to the case in subsequent boxes. In this way, the assistant in active charge will receive notice.

6. Appearances and Trial Bar Membership

All attorneys filing appearances must indicate whether or not they are members of the trial bar of this Court and whether or not they are the attorney who will try the case in the event that it goes to trial.

In criminal actions, an attorney who is not a member of the trial bar may not file an individual appearance. Pursuant to General Rule 3.10, a member of the trial bar must accompany such attorney and must also file an appearance.

In civil actions, an attorney who is not a member of the trial bar should designate the trial bar attorney who will try the case in the event that it goes to trial. If a trial bar attorney is not listed on the initial appearance and the case goes to trial, a trial bar attorney, pursuant to General Rule 3.15, must obtain leave of Court to file an appearance.

7. Designation of Local Counsel

Pursuant to General Rule 3.13, an attorney who does not have an office in this District may appear before this Court "only upon having designated, at the time of filing his/her initial notice or pleading, a member of the bar of this Court having an office within this District upon whom service of papers may be made." No attorney having an office in this District may designate local counsel. No attorney may designate more than one attorney as local counsel. Notices will be mailed by the Clerk's Office to both the attorney shown in box (A) and the attorney designated as local counsel.

Revised 4/1/91

United States District Court

Northern District of Illinois  
Eastern Division

FILED

SEP 15 1993

H. STUART CUNNINGHAM  
CLERK, U. S. DISTRICT COURT  
NO. 93 C 4483

Plaintiff(s) UNITED STATES

vs.

Defendant(s) FUNDS IN ACCOUNTS 263226700, et al

AFFIDAVIT EVIDENCING COMPLIANCE WITH GENERAL RULE 39

FILED

CLAIMANTS BOLA A. TINUBU, K.O. TINUBU AND ALHADI MOGATI

Affiant is the attorney of record for

SEP 15 1993

(here insert all parties represented by affiant)

H. STUART CUNNINGHAM, CLERK  
UNITED STATES DISTRICT COURT

and has knowledge of the matters covered by this affidavit and has read General Rule 39.

Affiant has not directly or indirectly solicited employment by the above-named party or parties, and knows of no solicitation of said party or parties by any person that has resulted in the employment of the affiant, except (here state all exceptions, or if none state "no exception"): NO EXCEPTION

Affiant has not paid, or promised to pay, and knows of no payment or promise of payment to the above-named party, or parties, of the costs of this case, or of the medical, living or other expenses of any party, or of any part of an attorney's fee, or of any portion of the recovery by suit or settlement herein to any person whatever other than the above-named party or parties and the attorneys of record herein, except (here state all exceptions, or if none state "no exception"): NO EXCEPTION

Affiant has filed contemporaneously herewith a signed copy of any written contingent fee agreement applicable to his compensation for representing the above-named party or parties in this action and represents that a signed copy thereof has been furnished to each party he represents; if no copy of a contingent fee agreement is filed herewith, affiant represents that his compensation for services in this case is not on a contingent basis.

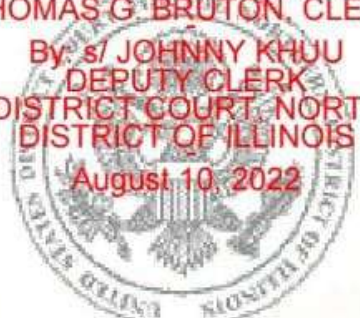
[Signature]  
(Affiant)

ROCKETED  
SEP 21 1993

Subscribed and sworn to before me this 15th day of September, A. D. 19993.

A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK

By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS



August 10, 2022

ATTORNEY  
TITLE

15

CERTIFICATE OF PUBLICATION LED

CASE NO. 93C-4483

SEP 28 1993

Seized FUNDS IN ACCOUNTS

H. Street Fundations, Clerk  
United States District Court

LAW BULLETIN PUBLISHING CO.

does hereby certify that it is the publisher of

CHICAGO DAILY LAW BULLETIN,

**UNITED STATES MARSHAL'S NOTICE.**  
District Case No. 93C-4483.  
To Whom It May Concern:

Whereas, a Seizure of Warrant and Monition issued out of the United States District Court of the United States of America for the Northern District of Illinois, on the 26th day of July, A.D., 1993, pursuant to a complaint filed by Michael J. Shepard, United States Attorney for the Northern District of Illinois, and against certain merchandise to-wit:

Funds in Account 263226700 held by First Heritage Bank in the name of Bola Tinubu, Funds in Accounts 39483134, 39483396, 4650279566, 00400220, 39936404, 39936383, held by Citibank, N.A. in the name of Bola Tinubu or Compass Finance & Investment Co. and Funds in Accounts 52050-89451952, 52050-89451952, 52050-89451953 held by Citibank, International in the name of Bola Tinubu,

for causes and reasons in said complaint mention, praying for the forfeiture, condemnation, or destruction of said merchandise. Under and by virtue of said monition, I have attached and have the same now in my custody in storage in the City of New York, New York and Country Club Hills, Illinois. Pursuant to Rules C(4) and C(6) of the Supplemental Rules (Federal Rules of Civil Procedure), notice is hereby given that said Monition is returnable within ten (10) days of this notice, next, when if that shall be a day of jurisdiction, otherwise on the next day of jurisdiction thereafter, all persons claiming said merchandise, or knowing or having anything to say why the same should not be condemned as forfeited to the use of the United States of America, pursuant to the prayer of said complaint, are then required to be and appear before said Court in the City of Chicago in the Northern District of Illinois and Division, ten (10) days after publication. And then and there interpose their claims for the same and to make their allegations in that behalf, by filing their claims with the Clerk of the Court, Northern District of Illinois, 219 South Dearborn Street, 20th Floor, Chicago, Illinois. Any person having filed a claim within the time limits heretofore set forth must file an answer within twenty (20) days following the filing of the claim. Failure to file a claim and answer may result in default and condemnation.

Dated at Chicago, Illinois, this 1st day of September, A.D., 1993.

MARVIN LUTES  
U.S. Marshals Service,  
Northern District of Illinois.  
929267 Sept-1

that said CHICAGO DAILY LAW BULLETIN is a secular newspaper that has been published DAILY in the City of Chicago, County of Cook, State of Illinois, continuously for more than one year prior to the first date of publication of the notice appended, that it is of general circulation throughout said County and State, that it is a newspaper as defined in "An Act to revise the law in relation to notices," as amended, Illinois Compiled Statutes, (715 ILCS 5/1 & 5/5), and that the notice appended was published in the said CHICAGO DAILY LAW BULLETIN on

SEPTEMBER 01, 1993.

DOCKETED

OCT 05 1993

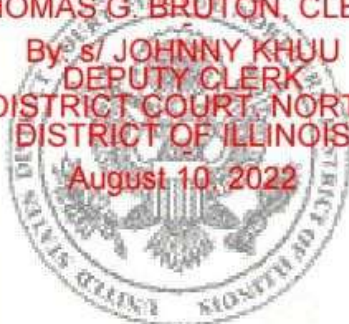
In witness whereof, the undersigned has caused this certificate to be signed and its corporate seal affixed at Chicago, Illinois,

SEPTEMBER 01ST, 1993.

LAW BULLETIN PUBLISHING CO.

By H. Street

A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK  
By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS



UNITED STATES MARSHAL  
1993 SEP 22 PM 8:52  
NORTHERN DIST. OF IL.

93-C-4483  
16

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**DOCKETED**  
OCT 5 - 1993

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
FUNDS IN ACCOUNT 263226700 )  
HELD BY FIRST HERITAGE BANK IN )  
THE NAME OF BOLA TINUBU, )  
 )  
FUNDS IN ACCOUNTS 39483134, )  
39483396, 4650279566, 00400220, )  
39936404, 39936383, )  
HELD BY CITIBANK, N.A. )  
IN THE NAME OF BOLA TINUBU OR )  
COMPASS FINANCE & INVESTMENT CO., )  
 )  
FUNDS IN ACCOUNTS 52050-89451952, )  
52050-89451952, 52050-89451953 )  
HELD BY CITIBANK, INTERNATIONAL )  
IN THE NAME OF BOLA TINUBU, )  
 )  
Defendants. )

No. 93 C 4483  
Judge Nordberg

A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK  
By: s/ JOHNNY KHUU  
DEPUTY CLERK  
U.S. DISTRICT COURT, NORTHERN  
DISTRICT OF ILLINOIS  
August 10, 2022

**DECREE OF FORFEITURE AS TO FUNDS  
HELD BY FIRST HERITAGE BANK**

This matter coming before the Court upon the motion of the  
the United States of America, the Court finds as follows:

(a) The United States filed a Verified Complaint for  
Forfeiture against the funds in the above-captioned defendant  
accounts because there was probable cause to believe that the  
property represented proceeds of narcotics trafficking or was  
property involved in financial transactions in violation of 18  
U.S.C. §§ 1956 and 1957 and therefore was forfeitable to the United  
States pursuant to 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981. The

funds in the defendant accounts were seized initially by seizure warrants;

(b) The defendant accounts held by Citibank and First Heritage Bank are in the name of Compass Financial and Bola Tinubu. Ownership interests in the funds in these defendant accounts have been asserted on behalf of Bola A. Tinubu, K.O. Tinubu (individually and on behalf of the Tinubu Family) and Alhaji Mogaji. These individuals warranted that they had exclusive right, title and interest to the defendant property seized;

(c) The Court has jurisdiction over the defendant accounts and over the subject matter of this action;

(d) A verified complaint was filed on July 26, 1993;

(e) Warrants of seizure and monition were served by the United States Marshal's Service;

(f) The United States and the individual claimants agreed to settle and to compromise this action upon terms previously presented to the Court;

(g) A Settlement Order relating to the individual claimants was approved and signed by this Court on September 15, 1993;

(h) Pursuant to the stipulation for compromise settlement made a part of the Settlement Order, funds remaining in the amount of \$460,000 in the defendant account held by First Heritage Bank in the name of Bola Tinubu were to be forfeited by the United States when publication was completed if no other claims to the funds were made;

(i) Pursuant to Rule C of the Supplemental Rules Governing


Certain Admiralty and Maritime Claims, the United States Marshal published notice of the seizure on September 1, 1993, directing that any claim be filed within ten days of said date and any answer be filed within twenty days of the filing of the claim;

(j) Neither a claim nor answer has been filed on behalf of the defendant funds other than the claims previously resolved by this Court in its Settlement Order dated September 15, 1993 accordingly, it is hereby

ORDERED that the funds in the amount of \$460,000 in account 263226700 held by First Heritage Bank in the name of Bola Tinubu represent proceeds of narcotics trafficking or were involved in financial transactions in violation of 18 U.S.C. §§ 1956 and 1957 and therefore these funds are forfeit to the United States pursuant to 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981; it is further

ORDERED that First Heritage Bank shall issue a check in the amount of \$460,000 payable to Federal Reserve Bank of Chicago and that these funds shall be disposed of according to law; it is further

ORDERED that the Court shall retain jurisdiction over this action in order to implement and enforce the terms of this Decree of Forfeiture.

  
\_\_\_\_\_  
JOHN A. NORDBERG  
United States District Judge

Dated: Oct. 4, 1993



UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS

Name of Assigned Judge or Magistrate Judge	John A. Nordberg	Sitting Judge if Other Than Assigned Judge	
Case Number	93 C 4483	Date	October 4, 1993
Case Title	USA v. Acct #263226700, etal		

(In the following box (a) indicate the party in the motion, e.g., plaintiff, defendant, 3rd-party plaintiff, and (b) state briefly the nature of the motion being presented.)

MOTION:

Sent for Microfilming  
OCT 5 - 1993  
Filmed on  
OCT 05 1993

DOCKET ENTRY:

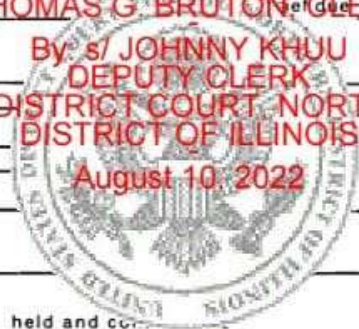
(1)	<input type="checkbox"/>	Filed motion of [use listing in "MOTION" box above]
(2)	<input type="checkbox"/>	Brief in support of motion due _____
(3)	<input type="checkbox"/>	Answer brief to motion due _____
(4)	<input type="checkbox"/>	Ruling on _____ at _____
(5)	<input type="checkbox"/>	Hearing <input type="checkbox"/> held <input type="checkbox"/> continued to _____ at _____
(6)	<input type="checkbox"/>	Status hearing <input type="checkbox"/> held <input type="checkbox"/> continued to _____ at _____
(7)	<input type="checkbox"/>	Pretrial conf. <input type="checkbox"/> held <input type="checkbox"/> continued to _____ at _____
(8)	<input type="checkbox"/>	Trial <input type="checkbox"/> Set for <input type="checkbox"/> re-set for _____ at _____
(9)	<input type="checkbox"/>	Bench Trial <input type="checkbox"/> Jury Trial <input type="checkbox"/> Hearing held and con. _____ at _____
(9)	<input type="checkbox"/>	This case is dismissed <input type="checkbox"/> without <input type="checkbox"/> with prejudice and without costs <input type="checkbox"/> by agreement <input type="checkbox"/> pursuant to _____
	<input type="checkbox"/>	FRCP 4(j) (failure to serve) <input type="checkbox"/> General Rule 21 (want of prosecution) <input type="checkbox"/> FRCP 41(a)(1) <input type="checkbox"/> FRCP 41(a)(2)
(10)	<input checked="" type="checkbox"/>	[Other docket entry] Counsel for the plaintiff appeared. Enter Decree of Forfeiture as to Funds Held by First Heritage Bank. It is ordered that the funds in the amount of \$460,000 in account 263226700 held by First Heritage Bank in the name of Bola Tinubu are forfeited to the United States pursuant to 21 USC 881(a)(6) and 18 USC 981. It is ordered that First Heritage Bank shall issue a check in the amount of \$460,000 payable to Federal Reserve Bank of Chicago.
(11)	<input checked="" type="checkbox"/>	[For further detail see <input type="checkbox"/> order on the reverse of <input checked="" type="checkbox"/> order attached to the original minute order form.]

A TRUE COPY-ATTEST  
THOMAS G. BRUTON, CLERK

By: s/ JOHNNY KHUU  
DEPUTY CLERK

U.S. DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS

August 10, 2022



<input type="checkbox"/>	No notices required, advised in open court.	ED-5 RECEIVED FOR DOCKETING OCT 5 - 1993 OCT 05 1993	number of notices	Document # 18
<input type="checkbox"/>	No notices required.		date docketed	
<input type="checkbox"/>	Notices mailed by judge's staff.		docketing dpty. initials	
<input type="checkbox"/>	Notified counsel by telephone.		date mailed notice	
<input checked="" type="checkbox"/>	Docketing to mail notices.		mailing dpty. initials	
<input type="checkbox"/>	Mail AO 450 form.			
<input type="checkbox"/>	Copy to judge/magistrate Judge.			
<input type="checkbox"/>	courtroom deputy's initials	Date/time received in central Clerk's Office		

RW

(Reserved for use by the Court)

**ORDER**

