

SCANNED ON 1/29/2008

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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PT PUKUAFU INDAH, PT LEBONG TANDAI,
PT TANJUNG SERA PUNG, and
GIDEON MINERALS U.S.A., INC.,

Plaintiffs,

Index No. 08600247

v.

SUMMONS

SOCIÉTÉ GENERALE,

Defendant.

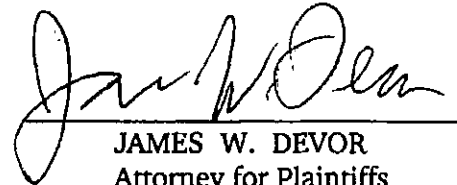
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TO THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and required to serve upon plaintiff's attorney an Answer to the Complaint in this action within twenty days after the service of this Summons, exclusive of the day of service, or within thirty days after service is complete if this Summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgement will be taken against you by default for the relief demanded in the Complaint.

The basis of the venue designated is the principal offices of the Defendant which is:

1221 Avenue of the Americas
New York, N.Y. 10020

Dated: New York, New York
January , 2008



JAMES W. DEVOR
Attorney for Plaintiffs
305 Broadway - Suite 601
New York, New York 10007
Telephone: (212) 374-1969

FILED
JAN 25 2008
NEW YORK
COUNTY CLERK'S OFFICE

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COMPLAINT

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Plaintiffs PT PUKUAFU INDAH, PT LEBONG TANDAI, PT TANJUNG SERA
PUNG, AND GIDEON MINERALS U.S.A., INC., by and through their attorney, James
W. Devor, as and for their Complaint against Defendant Societ Generale respectfully
show and state as follows:

PARTIES AND VENUE

1. Plaintiffs PT Pukuafu Indah, PT Lebong Tandai, PT Tanjung Sera Pung and Gideon Minerals USA, Inc. are companies which own, inter alia, certain properties known as "Batu Hijau" and "Minahasa Raya" and the mineral rights thereof.
2. Plaintiff Gideon Minerals USA, Inc. is a Delaware corporation which is a holding company whose assets are Plaintiffs PT Pukuafu Indah, PT Lebong Tandai and PT Tanjung Sera Pung.
3. Defendant Societé Generale is a banking company which is domiciled in the nation of France and a foreign corporation authorized to transact business in the State of New York. Defendant Societé General maintains and operates a branch office located at: 1221 Avenue of the Americas, in the County and City of New York wherein its principal domestic office is located.
4. As such, venue is properly placed pursuant to CPLR Sec. 503(c).

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FACTS

5. Since in or about 1986, and continuing through at least the present date, Plaintiffs have had a lawful claim upon the past, present and future proceeds arising from the operation of the Bata Hijau and Minahasa Raya mines.

6. Upon information and belief, said output is valued at \$6,587,812,332 and 00/100.

7. In or about August, 2002, Defendant Societé Generale did make known to Plaintiffs auditor that it was actively trading minerals commodities from the Bata Hijau and Minahasa Raya mines.

8. Defendant Societé Generale was informed by Plaintiffs' auditors that the commodities being traded under the name of Minahasa Raya and Batu Hijau were (and remain) the property of the Plaintiffs herein.

9. Over a period of several months Plaintiffs communicated with the Chair and General Counsel of Defendant Societé Generale's New York office in an effort to have Defendant cease all trading in precious metals produced from Minahasa Raya and Batu Hijau.

10. Nevertheless, Defendant Societé Generale refused to accede to that demand.

11. In or about August 2007, a Congressional Inquiry regarding the subject matter of this action was started by the Hon. United States Congressman Edolphus Towns.

12. Upon information and belief, after six months of the Congressional Inquiry began, no contracts, documents and/or agreements have been presented to support Defendant Societé General's claimed authority to buy, or trade, or sell in, or clear metals from Bantu Hijau and/or Minahasa Raya.

13. Plaintiffs have been denied all monies in the commodities accounts so

referenced herein as they currently exist, plus all amounts which have been previously paid out from said commodities accounts.

AS AND FOR A CAUSE OF ACTION

14. Plaintiff repeats each and every allegation contained in paragraphs 1 through 13 hereof with the same force and effect as if set forth herein at length.

15. Defendant Societé General has been and is continuing to trade in commodities accounts against the mineral rights of Batu Hijau and Minahasa Raya, and did wrongfully take and trade copper and gold from Batu Hijau and Minahas Raya, activity which, since at least August 2003, Defendant knew or upon inquiry could have known, was undertaken without the permission of the lawful owners of such assets, viz. Plaintiffs.

16. Defendant Societé General has therefore wrongfully converted Plaintiffs' mineral rights to its use, by continuing trade in copper and gold from Plaintiffs' property and thereby obtaining fees and other benefits for maintaining said commodities in the total absence of any lawful authority to trade Plaintiffs' copper and gold output.

17. Upon information and belief, the Plaintiffs' property thus wrongfully converted was (and is) in the form of cash, or in commodities trading accounts, held in an account on the books of Defendant Societé General.

WHEREFORE , Plaintiffs pray Judgment:

a) Directing Defendant Societé Generale to grant Plaintiffs full and complete access to said commodities accounts in order to obtain an accurate accounting of the copper and gold traded through those accounts;

b) Restraining and enjoining Defendant Societé General from any further trading in regard to Plaintiffs' assets without Plaintiffs' express permission;

c) Restraining Defendant Societé Generale from interfering with Plaintiffs' auditors in determining the quantity of precious metals that have been sold or otherwise traded from the Bata Hijau and Minahasa Raya mines, so as to assist Plaintiffs in obtaining an accurate, just recovery and the use of their property;

d) Awarding incidental and consequential damages in an amount to be determined at trial;

e) Awarding plaintiff the costs of this action, and

f) Granting such other further or different relief as this Court may deem just and proper under the circumstances.

Dated: New York, New York
January 21, 2008



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SUMMONS AND COMPLAINT

JAMES W. DEVOR

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New York, New York 10007
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Service of a copy of the within Summons and Complaint is hereby admitted.

Dated,

Attorney(s) for _____
