

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Joseph Riad,	§	
	§	
Plaintiff	§	
	§	
v.	§	Civil Action No. __:____-CV-_____
	§	
THE UNITED STATES OF AMERICA,	§	
	§	
Defendant	§	

**COMPLAINT FOR DAMAGES PURSUANT TO
THE FEDERAL TORT CLAIMS ACT**

Joseph Riad, Plaintiff, by and through undersigned counsel, Albert M. Iacocca, Esquire, now comes before this court and complains of the acts and omissions of the United States Government as follows:

JURISDICTION, VENUE, AND CONDITIONS PRECEDENT

1. The claims herein are brought against the United States pursuant to the Federal Tort Claims Act (28 U.S.C. §2671, et seq.) and 28 U.S.C. §§1346(b)(1), for money damages as compensation for loss of property that was caused by the intentional, willful, wrongful, and/or negligent acts and/or omissions of employees and/or agents of the United States Government while acting within the scope of their offices and/or employment, under circumstances where the United States, if a private person, would be liable to Plaintiff in accordance with the laws of the Commonwealth of Pennsylvania.
2. This cause of action arises pursuant to federal statutory law and thus this court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331.
3. Plaintiff would be entitled to pursue these claims under the laws of the

Commonwealth of Pennsylvania, including, but not limited to, claims in the nature of conversion, trespass to chattel, and/or intentional misrepresentation.

4. Pursuant to the Federal Tort Claims Act (28 U.S.C. §2671, et seq.) and 28 U.S.C. §§1346(b)(1), this court has explicit authority to exercise personal jurisdiction over the United States government and its officers and assigns.
5. Pursuant to 28 U.S.C. §1391(e)(3), venue for this civil action is proper in “any judicial district in which...the plaintiff resides if no real property is involved in the action.” Plaintiff is a resident of the Commonwealth of Pennsylvania and resides in Kennett Square, Chester County, which lies in the Eastern District of Pennsylvania. Thus, venue is proper in the Eastern District of Pennsylvania.
6. Plaintiff has fully complied with the provisions of 28 U.S.C. §2675(a) of the Federal Tort Claims Act. Plaintiff filed his Standard Form 95 Administrative Claim on June 4, 2010, and properly served it upon the Department of Homeland Security and the United States Department of Justice. Plaintiff’s claim was denied and Plaintiff now files this cause of action, as granted under the federal statute. A full copy of Plaintiff’s Form 95 Claim is attached hereto as “Exhibit A: Form 95 Claim”.

PARTIES

7. Plaintiff is a United States citizen who resides at 509 Schoolhouse Road, Kennett Square, Pennsylvania, 19348.
8. Defendant is the United States of America by and through the actions and/or omissions of representatives of the Department of Homeland Security, and is included as a defendant pursuant to the Federal Tort Claims Act.

BACKGROUND INFORMATION

9. Plaintiff possesses three sealed and certified bronze boxes. Each box contains two-hundred fifty (250) one billion dollar (\$1,000,000,000) 1934 Federal Reserve Bonds. The serial numbers of said bonds in each of the three bronze boxes are as follows:
- a. Box 1: F49494950A through F49495199A;
 - b. Box 2: F49494950B through F49495199B; and
 - c. Box 3: F49494950C through F49495199C.
10. Since obtaining legal possession of said bonds and bronze boxes, Plaintiff has maintained strict control of them and has kept them in the vault of his personal bank, Wells Fargo Bank, in Kennett Square, Pennsylvania. Said bonds, absent the fifteen (15) bonds which give rise to this current cause of action, remain in the Wells Fargo Bank vault as of the filing of this complaint.
11. Plaintiff has spent the previous nine (9) years engaging various and numerous experts and legal counsel so as to thoroughly and conclusively establish the existence, veracity, and authenticity of his bonds.
12. Kermit Harmon, PE, CEM, CCP, DGCP, a former Security Director for the Dallas Federal Reserve Bank¹ and an expert in bonds, notes, and other financial instruments, inspected said bonds with the assistance and expertise of an additional forensic expert, Bruce Colburn, PhD, P.E., CEM. After a thorough inspection of

¹ In his official capacity as Security Director for the Dallas Federal Reserve, Mr. Harmon had been involved with the verification of different high denomination bonds, and in fact held a sample in his hands after it had been independently authenticated by others (it was \$100 million denomination bond). Therefore, Plaintiff had an independent confirmation that such type bonds did exist, and had been printed legitimately, despite US web sites claiming such instruments do not exist.

Plaintiff's bonds and based upon his knowledge and expertise, Mr. Harmon concluded that Plaintiff's bonds met a wide and specific variety of test requirements and in fact are authentic, government-issued Federal Reserve Bonds. Mr. Harmon's report addressing the authenticity of the Bonds and his and Dr. Colburn's credentials are attached hereto as "Exhibit B: Harmon Report".

13. After reviewing the Bureau of Engraving and Printing (BEP) document records, Mr. Harmon also confirmed that the serial numbers of Plaintiff's bonds referred to in Paragraph 7 hereinabove can all be verified at the U.S. Treasury Archive Office as being legitimate, high-denomination bond numbers that were all issued and/or assigned to government bonds by legitimate representatives of the U.S. Government at or around the time Plaintiff believes his bonds were printed. See "Exhibit B: Harmon Report".

14. Plaintiff's bonds all possess the same physical qualities, characteristics, and construction as all other BEP and U.S. Treasury documents. The paper used in Plaintiff's bonds is identical to the currency paper used by the U.S. Treasury for printing currency and bonds, and the bonds possess the identical security features that were in use by the BEP during the time period that Plaintiff's bonds were believed to have been printed. See, "Exhibit B: Harmon Report" attached hereto.

15. A.J. Obara, internationally-renowned bronze sculptor and bronze metal expert, inspected Plaintiff's three bronze boxes containing the bonds. Mr. Obara independently identified the boxes as having the same construction and markings as all other authentic bronze bond boxes commissioned by the FRB during the

early 1900s.² Based upon his inspection, Mr. Obara further concluded that the bronze boxes were constructed in or around the 1930s, at or around the same time that Plaintiff's bonds were printed, and, other than Plaintiff having opened them, the boxes were original, authentic pieces and were not previously tampered with or altered in any fashion. A copy of Mr. Obara's credentials and his report addressing the authenticity and integrity of the bronze boxes are attached hereto as "Exhibit C: Obara Report".³

16. Having extensively authenticated his bonds, Plaintiff contacted former Deputy Secretary of the Treasury, Stuart Eizenstat, Esquire, for assistance in repatriating the bonds to the U.S. Treasury, with his intent being to assist in reducing outstanding U.S. debts. Mr. Eizenstat was familiar with repatriation of high denomination bonds and had been involved peripherally in such transactions while Deputy Secretary of the Treasury in the 1990s. At a meeting in February 2008, Plaintiff showed Mr. Eizenstat high resolution photos of the boxes and bonds and provided a sample bond for Mr. Eizenstat to inspect. Because Mr. Eizenstat recognized that the bond in his hand and the high resolution photos of the boxes

² If it were possible to construct such a box today, the boxes would each cost hundreds of thousands of dollars to construct. Moreover, Mr. Obara noted that there were, and are, only a handful of people in the world who had, or have, the skill-set necessary to develop such pieces. Furthermore, due to the unique workmanship and excessive costs involved in creating such a box, it is clear that the boxes were extremely unique and only people who had a legitimate need for those boxes would ever have commissioned them. As such, Plaintiff's claim that the bronze boxes are authentic and certifiable are certainly substantiated, which, in turn, further substantiates Plaintiff's claim that his bonds are also authentic and certifiable.

³ Plaintiff later contacted Dr. Franklin Noll, a consultant with of the Bureau of Public Debt who is an historian with expertise in the history of government-issued, high-denomination bonds, such as those Plaintiff possesses. Dr. Noll is a known lecturer, and he frequently writes published papers for the U.S. government regarding high-denomination bonds such as Plaintiff's. In communications with Plaintiff, Dr. Noll stated that such bonds were prepared legally by the U.S. government for debt management purposes in the 1930s, and that billion-dollar bonds were prepared as part of this effort. Dr. Noll explained that such bonds, stored in custom bronze boxes, were common at that time because it was cheaper at that time to prepare and then move high-denomination bonds and their bronze boxes as compared to moving hundreds of times more pieces of lower-denomination currency and bonds, which would have been cumbersome and impractical. Written and telephone communications between Dr. Noll, Plaintiff, and Dr. Colburn concerning these details further substantiated the history and existence of bonds such as Plaintiff's bonds and their containment boxes. Plaintiff provided Dr. Noll with copies of the forensic data and reports obtained by Plaintiff, and, after reviewing those documents, Dr. Noll acknowledged that Plaintiff had followed a methodical, rigorous, and sophisticated inspection and authentication of his bonds, and generally agreed with the findings of Mr. Harmon and Dr. Colburn.

were authentic and genuine, he was shocked at what Plaintiff had provided to him. After some inquiries following that meeting, and due to political considerations of his law firm, Mr. Eizenstat referred Plaintiff to other counsel. Through a business acquaintance, Plaintiff was introduced to Patrick Oxford, Esquire of Houston, who then assisted Plaintiff in determining and then contacting the appropriate U.S. governmental agency that could best assist Plaintiff in repatriating his bonds for redemption or reward. Mr. Eizenstat was familiar with Mr. Oxford and was very helpful and cooperative in providing background information to him in support of the work Plaintiff had completed to secure a successful repatriation of the gold-backed Government bonds. Due to Mr. Eizenstat's prior experience with the U.S. Treasury Department, he was able to offer Mr. Oxford various insights and ideas that were helpful to Mr. Oxford in his discourse with the Treasury Department.

17. Based upon Mr. Eizenstat's advice and with the assistance of Mr. Oxford, Plaintiff contacted the U.S. Secret Service in or around mid-2008, as he was informed that this agency would be able to assist him in repatriating his bonds.
18. Plaintiff and Mr. Oxford met with representatives of the Secret Service, Agents Chad Sweet and Craig Caldwell at Mr. Oxford's Houston law offices. Upon the request of the Agents Sweet and Caldwell, Plaintiff provided copies of his expert reports, as well as several of his actual bonds to the Secret Service for their inspection. Agents Sweet and Caldwell requested that they be able to keep the bonds for further inspection, and Plaintiff was ensured by those agents that his bonds would be returned to him within one to two weeks in the same condition in which they received them and records of the exact bonds and documents loaned to

the Secret Service in Houston were confirmed. Said reports are attached hereto as a part of "Exhibit A: Form 95 Claim".

19. Agents Sweet and Caldwell inspected Plaintiff's bonds, reviewed the accompanying expert reports, and performed their own evaluations and tests so as to render their own opinion as to the authenticity of Plaintiff's bonds. Upon concluding their inspection of the bonds, and as promised, the agents returned Plaintiff's bonds and his expert reports to him via Mr. Oxford. At that time, the agents advised Plaintiff that while they were not able to officially state that the bonds were authentic, they did inform Plaintiff that the mere fact that the bonds were being returned to Plaintiff indicated that they were not fraudulent or illegal, as such status would require them to be seized by the Secret Service.
20. Agents Sweet and Caldwell then specifically referred Plaintiff to Donna Ayers, an official with the Bureau of Public Debt (BPD) in West Virginia. Plaintiff was further advised by them that the BDP was the specific government agency that would be able to best handle the redemption of Plaintiff's bonds.
21. Accordingly, Plaintiff contacted Donna Ayers at the BPD in or around September 2008, initially via email and then by phone. Despite the reports and findings provided to her by Plaintiff and despite the fact that Plaintiff was specifically directed to contact her by Agents Sweet and Caldwell, Ms. Ayers categorically denied the existence of bonds such as Plaintiff's bonds and directed Plaintiff back to the Secret Service.
22. Plaintiff again contacted Agents Caldwell and Sweet, who again contacted Ms. Ayers and informed her that Plaintiff had completed the appropriate and required

examination and authentication of the Bonds and that the redemption of said bonds did fall under the purview of the BPD, since the Bonds were outstanding government issued securities/debts.

23. Upon contacting Ms. Ayers again, Plaintiff was advised by her that neither she, nor the BPD, had the authority to redeem his bonds.
24. Having made no progress with the Ms. Ayers or the BPD, Plaintiff then pursued outside assistance in determining the specific government agency that would have the means and authority to assist him with his attempts to redeem the bonds.
25. During this same time period, Plaintiff also contacted various government officials for assistance in repatriating his bonds, including US Representative Joe Pitts (PA), Senator Arlen Specter (PA), and Senator Rick Santorum (PA).
26. As part of his ongoing attempts to find the correct government agency which could handle repatriation of Plaintiff's bonds for reward to Plaintiff, the Plaintiff was directed by another party to contact Neil Gibson, an alleged British financial consultant who claimed to have experience in the repatriation of high-denomination U.S. government bonds, and who represented to Plaintiff that he had a contract with the US Government to complete such transactions and that he had successfully handled such projects on behalf of the US Government in the past. Gibson substantiated his credentials by emailing Plaintiff an electronic copy of correspondence on Federal Reserve Bank of San Francisco letterhead ostensibly from one Robert Davis dated March 31, 2008. Said correspondence confirmed Mr. Gibson's prior statements to Plaintiff and Mr. Oxford, specifically stating that Mr. Gibson had the requisite experience and authority to assist Plaintiff with

repatriating his U.S. bonds. The correspondence also indicated that Mr. Davis was the director of the Special Acquisitions Division of the Federal Reserve Bank of San Francisco (FRBSF).⁴ Said correspondence also included the contact information for Agent Nickolaus Jones from the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) – Office of Investigations, and stated that Agent Jones was the DHS officer who needed to be contacted to repatriate such bonds. A copy of said correspondence is attached hereto as “Exhibit D: Davis Correspondence”.

27. Mr. Gibson then allegedly provided services to Plaintiff by contacting Special Agent Daniel Lombardi of the U.S. Secret Service, ostensibly to further validate the existence and authenticity of Plaintiff’s bonds. At some point, it was reported to Plaintiff by Neil Gibson by phone that Agent Lombardi confirmed the legitimacy of Plaintiff’s bonds and that the serial numbers of the bonds were valid and verifiable through the Department of the Treasury. The exact details of the communications between Mr. Gibson and Agent Lombardi are unknown to Plaintiff.

FACTS GIVING RISE TO COMPLAINT

28. In an effort to expedite his attempt to repatriate his bonds and because Mr. Gibson had allegedly become unavailable to Plaintiff due to business travel, Plaintiff contacted Agent Jones directly, as the correspondence Plaintiff was given by Mr. Gibson indicated that Agent Jones was the individual from the DHS who would be able to assist Plaintiff in repatriating his bonds and obtaining the resulting reward

⁴ However, later investigations revealed that, not only was Mr. Davis a fictitious character, but he was a deliberate and necessary confabulation in Agent Jones’ plan to fraudulently obtain Plaintiff’s bonds.

fees from the US Government. However, no phone number was provided for Agent Jones, and Mr. Oxford used his contacts in Washington, D.C. to track down Agent Jones in his Irvine, CA DHS offices.

29. Plaintiff was able to contact Agent Jones and he confirmed to Plaintiff his ability and his specific, government-granted authority as a DHS agent to handle matters involving the repatriation of high-denomination gold bonds such as Plaintiff's. Although later determined to be a bald-faced lie, Agent Jones confirmed that he and Mr. Gibson enjoyed an effective working relationship with the agency for the previous five (5) years. Agent Jones continued his deception by advising Plaintiff specifically that he had prior experience with such high-denomination, gold-backed bonds, and that those individuals whom he had assisted in the past had received the standard "reward" for repatriating such bonds. Agent Jones advised Plaintiff that, based upon his experience, said reward amount was between three (3) and five (5) percent of the face value of the bonds and would be paid by the U.S. Treasury.
30. Throughout the various and repeated telephone and email communications with Plaintiff, Agent Jones confirmed the existence of various high-denomination, gold-backed bonds such as Plaintiff's, and went so far as to state that Plaintiff's initial description of his bonds was strikingly similar to the high-denomination, gold-backed bonds Agent Jones knew existed and that he, therefore, wanted to learn more about Plaintiff's bonds.
31. After a brief exchange of emails and phone calls, Plaintiff then provided Agent Jones with copies of the same expert reports, pictures, and opinions that Plaintiff

had previously provided to the Secret Service and BPD, and the same items Plaintiff filed with his Form 95 Claim. See “Exhibit A: Form 95 Claim”.

32. After reviewing Plaintiff’s reports, Agent Jones stated that the information Plaintiff provided was sufficient to warrant and necessitate a physical inspection of the bonds. Accordingly, Agent Jones requested a sampling of the bonds. Because of the high value of the bonds, Plaintiff and Mr. Oxford felt it necessary and prudent to arrange an in-person meeting with Agent Jones so as to officially confirm Agent Jones’ existence and capacity as a government agent and to safely and securely deliver the requested sample of the bonds in person, rather than via a parcel delivery service.
33. On Wednesday, March 11, 2009, Plaintiff and Mr. Oxford met Agent Jones at Agent Jones’ Irvine, California, DHS office. This meeting lasted approximately three (3) hours.
34. At said meeting, Agent Jones again confirmed that he was a U.S. Agent with the DHS and displayed his identification badge and provided his business card to Plaintiff and Mr. Oxford, copies of which are attached hereto as “Exhibit E: Agent Jones Identification”. Additionally, the fact that DHS personnel in the Irvine office knew Agent Jones demonstrated to Plaintiff and Mr. Oxford that Agent Jones was a legitimate federal law enforcement agent.
35. A second individual, ostensibly a DHS colleague of Agent Jones, was present at said meeting; however, neither he nor Agent Jones would provide an identification badge or business card of this other person, despite the fact that Plaintiff and Mr. Oxford made multiple and specific requests for said identification. Plaintiff and

Mr. Oxford were told by Agent Jones that such identification would not be forthcoming, nor was it necessary because Jones vouched for the individual's credentials and authority to be present.

36. During said meeting, Agent Jones stated to Plaintiff and Mr. Oxford that, upon seeing Plaintiff's bonds, he recognized the similarity between Plaintiff's bonds and the type of bonds that were being sought for repatriation by the Government. He further stated that if Plaintiff's bonds were the same, they would qualify for the redemption program that was allegedly in place at that time at the FRBSF. Agent Jones further claimed to have a direct connection to said redemption program, as well as experience in handling transactions in the past with the FRBSF through their Los Angeles office.

37. When specifically asked about the existence of Mr. Davis, the role he would play in the repatriation of Plaintiff's bonds as director of the FRBSF, and Plaintiff's inability to contact him at the FRBSF, Agent Jones not only confirmed the existence of Mr. Davis, but provided Plaintiff detailed directions as to how Plaintiff should go about contacting Mr. Davis. However, Mr. Davis was never able to be contacted by Plaintiff or Mr. Oxford, and the contact information Agent Jones provided proved to be bogus. The email correspondence from Agent Jones to Plaintiff detailing the directions to reach Mr. Davis at the FRBSF is attached hereto as "Exhibit F: Directions Email".

38. Based upon Agent Jones' stated and apparent authority to act on behalf of the U.S. Government as a DHS agent, based upon the fact that Agent Jones repeatedly and unequivocally told Plaintiff and Mr. Oxford of his ability and authority to assist

Plaintiff with the repatriation of his bonds, and based upon Agent Jones' representation to Plaintiff that he, Mr. Gibson, and/or Mr. Davis were the individuals who could best assist Plaintiff in repatriating his bonds, Plaintiff provided Agent Jones with fifteen (15) of the at-issue Bonds: five (5) original bonds from each of the three (3) metal containers, as well as the treasury-produced authentication documents. Plaintiff did so at the request of Agent Jones prior to their planned meeting in Irvine, CA; a request that specifically asked Plaintiff to produce a sampling of bonds from each of the three (3) boxes for Agent Jones to inspect. The serial numbers for those bonds and their supportive documents were as follows:

a. Series A:

- i. F49495198A
- ii. F49494950A
- iii. F49495197A
- iv. F49495025A
- v. F49495199A
- vi. F49495024A
- vii. F49494951A
- viii. F49494953A

b. Series B:

- i. F49495154B
- ii. F49494982B
- iii. F49494969B
- iv. F49495155B
- v. F49494962B
- vi. F49494968B
- vii. F49494996B

c. Series C:

- i. F49495002C
- ii. F49495003C
- iii. F49494970C
- iv. F49494971C
- v. F49495197C
- vi. F49495196C
- vii. F49495001C

d. Micro-Film, and all supporting documents for P.D F888-B S.C 0008-88F6.

39. Plaintiff and Mr. Oxford provided Agent Jones with a written, serial-number-based inventory of the fifteen (15) bonds Plaintiff was giving to him for signature so as to document Agent Jones' receipt of the bonds for inspection. Surprisingly, Agent Jones refused to sign said inventory, and he refused to issue a general receipt to Plaintiff indicating that he received the bonds from Plaintiff. However, in that meeting, Agent Jones assured Plaintiff and Mr. Oxford that he would return the bonds to Plaintiff after he completed his investigation into the authenticity of the Bonds, and that said investigation would take approximately one week to complete. Because they were meeting in DHS offices and given that Agent Jones had provided valid identification and appeared to be a legitimate member of the Irvine, CA DHS staff, Plaintiff, upon advice of counsel, reluctantly provided the bond samples to Agent Jones. A copy of the inventory of the bonds which Plaintiff attempted to deliver to Agent Jones is attached hereto as "Exhibit G: Inventory".

40. At the time of delivering his bonds to Agent Jones, Plaintiff fully expected that his bonds would be either redeemed or returned to him just as had happened with the Secret Service. At no point during said meeting did Agent Jones advise Plaintiff

that there was a possibility that his bonds would be confiscated by DHS or Agent Jones, nor did he advise Plaintiff of the possibility that his bonds would be destroyed by DHS and/or Agent Jones personally.

41. Approximately one week after his meeting with Plaintiff and Mr. Oxford, Agent Jones contacted Plaintiff via email and advised him that his bonds were not authentic, despite Plaintiff's extensive and exhaustive proof of the authenticity of the Bonds and despite the fact that the Secret Service had already directed Plaintiff to the BPD so as to repatriate his bonds. Agent Jones offered no evidence to corroborate his position that the bonds were not authentic, nor did he offer an explanation as to how he was able to so extensively and definitively examine the Bonds for authenticity within such a short period of time when it had taken Plaintiff's experts several months to complete their inspections and render their opinions as to the authenticity of Plaintiff's bonds. A copy of said email is attached hereto as "Exhibit H: Authenticity Email".

42. Upon receiving notice from Agent Jones that his bonds were allegedly not authentic or valuable, Plaintiff immediately requested that his bonds be returned to him. Contrary to Plaintiff's expectations, however, Agent Jones, without reason, refused to return the bonds.

43. Plaintiff again requested the return of the bonds to him, informing Agent Jones that he had no authority to keep the bonds. Agent Jones then informed Plaintiff that he couldn't return the bonds to Plaintiff because, despite having no apparent or actual authority to do so, he had destroyed Plaintiff's bonds.

44. Upon further challenge by Plaintiff to the accuracy of Agent Jones' supposed

evaluation,⁵ and Plaintiff's demand for the specific findings of Agent Jones, Jones stated that he could only provide such information to a federal agent with level "18 XXX" special clearance authorization level. Accordingly, Plaintiff sought to find a Federal Agent with such current authorization, and, fortuitously, Plaintiff's expert, Mr. Harmon, had an active "18 XXX" level authorization rating. Agent Jones was informed of Mr. Harmon's credentials, and a face to face meeting between Jones and Harmon was demanded by Plaintiff for the specific purpose of reviewing the alleged results of Agent Jones' inspection of Plaintiff's bonds. Despite having stated that he would meet with a qualified individual with "18 XXX" authority, upon learning that Plaintiff had produced such an individual, Agent Jones then refused to meet with Plaintiff and Mr. Harmon. From that time forward, Agent Jones refused to further discuss the matter with Plaintiff or Mr. Oxford, despite repeated requests by Plaintiff and/or Mr. Oxford via telephone and/or email.

45. At or about this same time, Agent Jones sent Plaintiff and Mr. Oxford emails, demanding that Plaintiff's three (3) bronze boxes and the remaining seven hundred thirty-five (735) bonds and supportive documents be surrendered to him immediately. Agent Jones also threatened Plaintiff that he would be prosecuted under federal law for refusing to turn over the bonds, citing specific U.S. Code provisions as authority for his threats. However, due to the unethical and uncertain circumstances surrounding Agent Jones, it appeared to Plaintiff and Mr.

⁵ Agent Jones had explained verbally to Plaintiff that various and slight wording and phrasings on the bonds indicated to him the bonds were not legitimate. Ironically, it is those exact minutiae that led Plaintiff's experts to conclude that the bonds are in fact legitimate and authentic.

Oxford that Agent Jones was attempting to scare Plaintiff in order to secure personal possession of the bonds and the bronze boxes. Upon the advice of Mr. Oxford, Plaintiff ignored Agent Jones' demands and threats. His refusal and threats are confirmed in email correspondence to Plaintiff dated, June 26, 2009, a copy of which is attached hereto as "Exhibit I: Refusal Email".

46. After several fruitless attempts to better determine the actual status of Plaintiff's bonds and recognizing that Agent Jones was no longer trustworthy, Mr. Oxford demanded that Agent Jones provide the name of the Assistant U.S. Attorney who had been assigned to this matter and who Agent Jones would have been working with to repatriate the bonds. Agent Jones stated that there was no attorney involved at this point, which information Mr. Oxford repudiated since an Assistant U.S. Attorney would always be involved in any such transactions through a federal agency.

47. Due to the repeated misrepresentations provided by Agent Jones during what is now known to Plaintiff to be the entirety of his dealings with Agent Jones, Plaintiff is uncertain as to the actual physical status of the fifteen (15) missing bonds. Based upon this information, Plaintiff believes that Agent Jones is currently in physical possession of Plaintiff's missing bonds, or that he has transferred possession of said bonds to a third party.

48. Plaintiff is also now aware that Mr. Gibson had been released from his duties with Treasury Department/ICE as an agent for repatriation of high denomination bonds. Since the time that Plaintiff had contacted him, it is now understood that Mr. Gibson had never been involved with the FRBSF, nor with the redemption

program for high-denomination bonds as he and Agent Jones had claimed.

49. Retrospectively, Plaintiff also believes and therefore avers that Agent Jones, with the assistance of Mr. Gibson, fabricated the individual known as Robert Davis, as well as the correspondence from Mr. Davis to Mr. Gibson described in Paragraph 25 hereinabove, as said correspondence was clearly a necessary tool in Agent Jones' scheme to dispossess Plaintiff of his bonds. By June 2009, Plaintiff and his team had spent considerable time and effort to confirm or deny the existence and/or validity of Mr. Davis. Eventually, Plaintiff learned from a representative of the FRBSF that no individual named Robert Davis had ever worked for the FRBSF, despite the ostensibly accurate and valid information sent to Plaintiff by Agent Jones and/or Mr. Gibson. Furthermore, and independently at or about this same time, Mr. Harmon contacted the Federal Reserve Bank in Washington, D.C. and also confirmed that no such individual works or worked for the FRBSF or any other Federal Reserve Bank branch.

50. Retrospectively, it is clear that Agent Jones, while operating under the actual and apparent authority that is inherent to his position as a U.S. agent with the DHS, provided Plaintiff with false and/or misleading documents and information with the intent to illegally obtain the Bonds from Plaintiff with the possible assistance of Mr. Gibson and/or Agent Lombardi, and/or other persons.

COUNT I – TRESPASS TO CHATTEL

51. Plaintiff re-alleges and incorporates by reference all of the allegations contained in all of the preceding paragraphs.

52. Agent Nicholas Jones, as an agent of the United States and in his individual

capacity, intentionally and willfully interfered with the right of possession of Plaintiff over fifteen (15) one billion dollar gold-backed bonds by taking them from Plaintiff and failing to return them to Plaintiff, despite Plaintiff having requested that he do so on multiple occasions.

53. Agent Jones, by either physically destroying Plaintiff's fifteen (15) bonds or refusing to return them to Plaintiff, deprived Plaintiff of the use and enjoyment of said bonds as the rightful owner.

54. Agent Jones therefore committed a trespass to Plaintiff's chattel, specifically the fifteen (15) gold-backed bearer bonds.

55. As a result of Agent Jones' trespass to Plaintiff's property, Plaintiff suffered property damages in the amount of fifteen billion dollars (\$15 billion).

COUNT II - CONVERSION

56. Plaintiff re-alleges and incorporates by reference all of the allegations contained in all of the preceding paragraphs.

57. Agent Nicholas Jones, as an agent of the United States and in his individual capacity, intentionally and willfully interfered with the personal property of Plaintiff sufficient enough to exercise complete and total dominion or control of Plaintiff's fifteen (15) one billion dollar gold-backed bearer bonds when he refused to return said bonds to Plaintiff upon request that he do so by Plaintiff.

58. Because Agent Jones failed to return the bonds to Plaintiff and/or destroyed said bonds, such interference warrants that Plaintiff receive full-value damages for his converted property.

59. As a result of Agent Jones' conversion of Plaintiff's property, Plaintiff suffered

property damages in the amount of fifteen billion dollars (\$15 billion).

COUNT III – INTENTIONAL MISREPRESENTATION

60. Plaintiff re-alleges and incorporates by reference all of the allegations contained in all of the preceding paragraphs.

61. Agent Jones, as an agent of the United States and in his individual capacity, intentionally and willfully provided information to Plaintiff that he knew or had reason to know was false on numerous occasions as follows:

- a. Provided false and misleading correspondence to Plaintiff that confirmed his relationship to Mr. Gibson and a fabricated individual known as Robert Davis;
- b. Informed Plaintiff and Plaintiff's counsel that he (Agent Jones) had the means and authority to redeem/repatriate all of Plaintiff's one billion dollar gold-backed bearer bonds; and
- c. Assured Plaintiff and Plaintiff's counsel that he would immediately return Plaintiff's fifteen (15) gold-backed bearer bonds to Plaintiff when he was done inspecting them.

62. Said facts were material facts in the transaction between Plaintiff and Agent Jones because Plaintiff relied on those facts when making the crucial decision to provide Agent Jones with fifteen (15) of the seven hundred fifty (750) gold-backed, one-billion-dollar bearer bonds he legally possesses.

63. Agent Jones did intend to cause Plaintiff to rely on the misrepresentation of facts and to provide Agent Jones with said fifteen (15) gold-backed, billion dollar bearer bonds.

64. Plaintiff justifiably relied on the misrepresentations made by Agent Jones because Plaintiff had no reason to believe that an agent of the United States who provided ostensible proof of his authority to assist Plaintiff and who met Plaintiff and his counsel in a government office would attempt to defraud him of his personal property.

65. As a result of Plaintiff's justifiable reliance on the misrepresented facts provided by Agent Jones, Plaintiff suffered property damages in the amount of fifteen billion dollars (\$15 billion).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Joseph Riad prays this Court grant him the following relief:

1. Money damages in the amount of fifteen billion dollars (\$15 billion), which amount is equal to the face-value of the fifteen (15) gold-backed billion dollar bearer bonds that Agent Jones fraudulently obtained from Plaintiff;
2. A declaratory judgment establishing the authenticity and validity of Plaintiff's \$1 billion gold-backed, government-issued federal reserve bearer bonds; and
3. Any other relief this Court in its discretion deems just and appropriate.

Respectfully Submitted,

By: _____

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