

IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN, GRAND CAYMAN
CAUSE NO. 545 OF 1995

IN THE MATTER OF THE GRAND COURT LAW
SECTION 13

AND

IN THE MATTER OF THE MUTUAL LEGAL
ASSISTANCE
(UNITED STATES OF AMERICA) LAW, SCHEDULE,
ARTICLE 16

AND

IN THE MATTER OF THE MISUSE OF DRUGS LAW,
SECTION 49 (1995 REVISION)

AND

IN THE MATTER OF THE MISUSE OF DRUGS LAW,
(DRUG TRAFFICKING OFFENCES)
(DESIGNATED COUNTRIES) ORDER, 1991
SECTION 6

AND

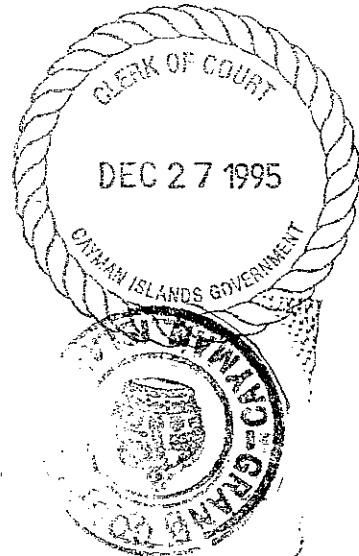
IN THE MATTER OF STEVEN MITCHELL

NOTICE OF MOTION

TAKE NOTICE that the grand court sitting at George Town, Grand Cayman, will be moved on the 10th day of January, 1996 at 10 o'clock in the forenoon, or as soon thereafter as counsel for the Attorney General may be heard for an order in the terms prayed in the affidavit annexed hereto.

Dated the 10th day of December, 1995.

Samuel Bulgin
Crown Counsel
for and on behalf of the
Attorney General



IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN, GRAND CAYMAN
CAUSE NO. 15 OF 1995

IN THE MATTER OF THE GRAND COURT LAW
SECTION 13

AND

IN THE MATTER OF THE MUTUAL LEGAL
ASSISTANCE
(UNITED STATES OF AMERICA) LAW, SCHEDULE,
ARTICLE 16

AND IN THE MATTER OF THE MISUSE OF
DRUGS LAW, SECTION 49 (1995 REVISION)

AND

IN THE MATTER OF THE MISUSE OF DRUGS LAW,
(DRUG TRAFFICKING OFFENCES)
(DESIGNATED COUNTRIES) ORDER, 1991
SECTION 6

AND

IN THE MATTER OF STEVEN MITCHELL

AFFIDAVIT OF SAMUEL BULGIN

I, SAMUEL W BULGIN of the 4th floor, Tower Building, Harbour
Drive, George Town, Grand Cayman HEREBY MAKE OATH AND SAY as
follows:

1. I am an Attorney-at-Law employed in the Cayman Islands
Government Legal Department as Crown Counsel.
2. I am informed and do verily believe that on the 18th day of
November 1992, the Mutual Legal Assistance Authority for the
Cayman Islands granted a Request by the United States Central
Authority (MIAT) for assistance in the criminal prosecution
in the United States of America of STEVEN MITCHELL on drug
trafficking offences; the details of that request are
contained in the copy of the same exhibited hereto as Exhibit
"SMB1".
3. The information provided by assistants in the Cayman Islands
confirmed the belief of the American Authorities that a
parcel of land described in the Land Register for the Cayman

Islands, Registration section Cayman Brac, Central as Block 101B, Parcel number 103 in the Cayman Islands was purchased with narcotics proceeds.

4. The land is in fact registered in the joint names of Steven F. Mitchell and Clara M. Mitchell a copy of the proprietorship section of the register in relation to the said land is exhibited hereto as Exhibit "SWB2".

5. Consequent upon the foregoing at paragraph 3, the Solicitor General for the Cayman Islands sought and obtained from the Grand Court of the Cayman Islands on the 27th October, 1995, an order the effect of which was to restrain any disposition or other dealing with the said land known as Cayman Brac, Central as Block 101B, Parcel number 103, copy of this order is exhibited herewith as Exhibit "SWB3".

6. I am informed and verily believe that Steven Mitchell was prosecuted to conviction in the courts in the United States of America and as a consequence of those criminal proceedings the prosecutorial authorities on the 13th day of October 1993, obtained out of the United States District Court, Northern District of Ohio Eastern Division, a "final order of forfeiture" exhibited hereto as exhibit "SWB4" whereby the aforementioned parcel of land was forfeited to the Government of the United States of America.

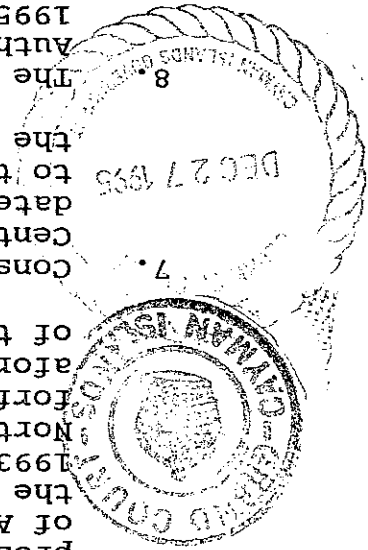
7. Consequent upon that forfeiture Order the United States Central (MIAT) Authority submitted a supplemental Request dated 16th May, 1995, and exhibited hereto as Exhibit "SW5" to the Cayman Central (MIAT) Authority, seeking assistance in the enforcement of this final order in the Cayman Islands.

8. The aforementioned request was approved by the Cayman Central Authority who by his certificate dated 12th day of December 1995, and exhibited hereto as, Exhibit "SWB6", authorised the Solicitor General to apply to the Grand Court of the Cayman Islands for an order to register the final order.

9. I have read the affidavit of Lena D. Watkins also annexed to the notice herein which affidavit was issued for and on behalf of the appropriate authority of the United States of America and this is exhibited herewith as Exhibit "SWB7"; on the basis thereof it is submitted that this court can and ought to be satisfied that at the time of this application

(a) the forfeiture order remains in force,
(b) the said order is final, and thus not subject to any appeal,

(c) the defendant in the forfeiture proceedings was properly notified in sufficient time and had adequate opportunity to defend them.



10. Having regard to the legal framework for co-operation between the United States of America and the Cayman Islands in the prosecution and suppression of crime including drug trafficking and, further having regard to the public interest in depriving those who are unjustly convicted from such illegal activities, it is urged that it is in the interest of justice that the final order of forfeiture Exhibited "SMB2" be enforced in these Islands. WHEREFORE I HUMBLY PRAY that this HONOURABLE COURT will be pleased to:

(a) Register the "Final Order of Forfeiture"

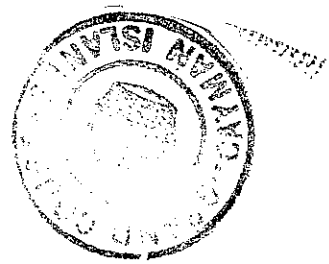
(b) order the appointment of a receiver to realise the property which is the subject of the aforementioned order by virtue of the provisions of the Misuse of Drugs Law (1995 Revision), section 39 and 40(3) as amended by the Misuse of Drugs (Drug trafficking offences) Designated countries) Order, 1991, second schedule, ss.7 and 8 (c).

(c) Direct that the proceeds from the property be thereafter disposed of by government in its discretion under the terms of the asset-sharing agreement between Cayman and the United States made pursuant to the Mutual Legal Assistance (United States of America) Law and the schedule thereto, and

(d) grant such further or other relief as may be just.

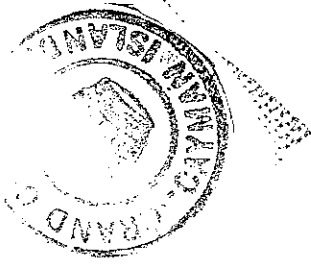
SWORN to at George Town
Grand Cayman this
2nd day of Dec. 1995
before me

Justice of the Peace



Samuel Bulgin

This affidavit is filed on behalf of the Attorney General of the Cayman Islands whose address for service is the Legal Department, Fourth Floor, Tower Building, Harbour Drive, George Town, Grand Cayman.



JUSTICE OF THE PEACE

[Handwritten signature]

THIS IS EXHIBIT "SWB1" REFERRED TO IN THE AFFIDAVIT OF
SAMUEL BULGIN SWORN TO BEFORE ME THIS ^{27th} DAY OF
DECEMBER 1995.

IN THE MATTER OF STEVEN MITCHELL

AND

SECTION 6
(DESIGNATED COUNTRIES) ORDER, 1991
(DRUG TRAFFICKING OFFENCES)

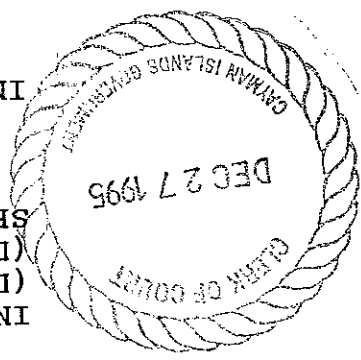
IN THE MATTER OF THE MISUSE OF DRUGS LAW,

AND

ARTICLE 16
(UNITED STATES OF AMERICA) LAW, SCHEDULE,
ASSISTANCE
IN THE MATTER OF THE MUTUAL LEGAL

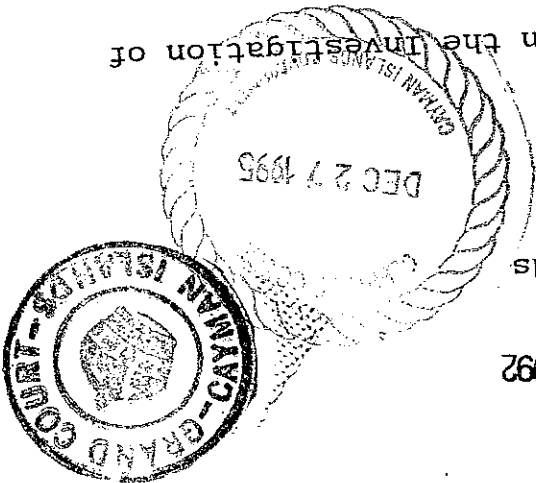
AND

SECTION 13
IN THE MATTER OF THE GRAND COURT LAW



IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN, GRAND CAYMAN
CAUSE NO. ⁵⁴⁵ OF 1995

JUN 29 1992



Mr. Anthony Smellie
Acting Attorney-General of the Cayman Islands
Government Administration Building
George Town, Grand Cayman
Cayman Islands, British West Indies

Dear Mr. Attorney General:

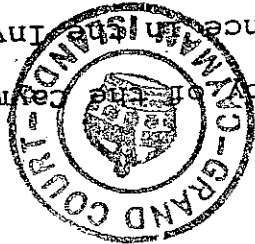
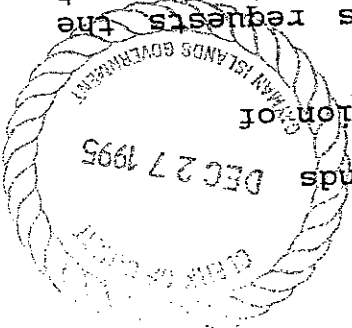
RE: Mutual Legal Assistance Request in the Investigation of
Steven Mitchell

Please find enclosed a copy of the amended request for legal
assistance under the Mutual Legal Assistance Treaty. Because of
the sensitive nature of this case, we are requesting that it be
treated with the confidentiality accorded under the Treaty.

Thank you for your assistance.

Sincerely,

George Proctor
Director
Office of International Affairs
Criminal Division
BY: *Deborah M. Gaynus*
Deborah M. Gaynus
Trial Attorney



SUBJECT: Request for Assistance of the Cayman Islands Investigation of Steven Mitchell

TO: The Central Authority of the Cayman Islands

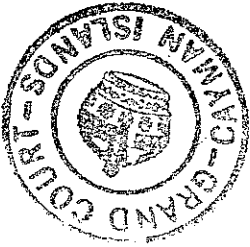
The Central Authority of the United States requests the assistance of the Central Authority of the Cayman Islands pursuant to the Treaty Between the United States of America and the United Kingdom of Great Britain and Northern Ireland Relating to Mutual Assistance in Criminal Matters, signed at George Town, Grand Cayman, July 3, 1986. The Drug Enforcement Administration and the Special United States Attorney for the Northern District of Ohio are investigating several persons suspected of violations of federal narcotics trafficking and money laundering statutes. In order to complete the investigation and prove that the offenses occurred, we need documents and testimony from persons involved in a real estate transaction which took place in the Cayman Islands.

SUBJECT AND NATURE OF THE INVESTIGATION

The Facts

The Special United States Attorney for the Northern District of Ohio is investigating an organization responsible for cultivating and distributing marijuana. Many of the individuals involved have been cooperating with and supplying information to investigators. This information, which has been corroborated by documents and interviews with non-accomplice percipient witnesses, indicates that Steven Mitchell, an attorney specializing in the practice of criminal law in Cleveland, Ohio, has been involved in the cultivation and sale of marijuana throughout the latter part of the 1980's and early 1990's. Mitchell has recruited subordinates to operate several marijuana growing operations which Mitchell has financed and supervised, and Mitchell has personally distributed for profit the yield of these marijuana crops. Additionally, Mitchell has received marijuana in multi-pound quantities, both by direct purchase and in lieu of legal fees from clients in exchange for legal services rendered, and has re-distributed for profit these quantities of marijuana.

Mitchell has used the proceeds of the sale of marijuana to purchase property located in the Cayman Islands. Mitchell purchased for \$30,000, a 1/2 acre tract of land identified as



We need the requested testimony, documents, and bank records in order to prove that Mr. Mitchell and his organization violated United States laws prohibiting narcotics manufacture and trafficking and the laundering of proceeds of such illicit activity.

PURPOSE FOR WHICH EVIDENCE IS SOUGHT

1. It is a violation of Title 18, United States Code, Section 1956, to launder the proceeds of drug trafficking. A violation of this statute is punishable by a fine of \$500,000 or twice the value of the monetary instrument or funds involved in the transportation, whichever is greater, or imprisonment for not more than twenty years, or both.
2. It is a violation of Title 21, United States Code, Section 841(a)(1), to manufacture a controlled substance. Marijuana is a controlled substance, and the cultivation of marijuana crops constitutes manufacture. A violation of this statute is punishable by a sentence of up to life imprisonment and a fine of up to four million dollars.
3. It is a violation of Title 21, United States Code, Section 841(a)(1) to distribute a controlled substance. A violation of this statute is punishable by a sentence of up to life imprisonment and a fine of up to four million dollars.
4. It is a violation of Title 21, United States Code, Section 846 to conspire to manufacture and/or distribute controlled substances. A violation of this statute is punishable by the same penalties as the underlying substantive crime. A violation of this statute is punishable by a sentence of up to life imprisonment and a fine of up to four million dollars.

The Offenses

brokered by a Mr. Moses Kirkconnell, a resident of Grand Cayman, and the seller is identified as Ms. Audrey Foster, also a resident of Grand Cayman. The investigation further indicates that the property was purchased with proceeds of narcotics trafficking as indicated by the fact that Mitchell does not appear to derive any significant income from his stated profession, does not appear to have assets of any significant nature, and was in fact declared bankrupt in 1988. These facts, combined with reliable information indicating that he is a marijuana cultivator and distributor indicates a strong likelihood that the Cayman tract was purchased with narcotics proceeds.

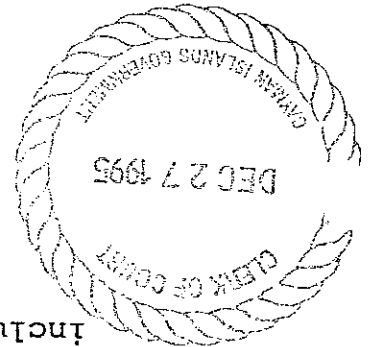
Mr. Steven Mitchell is a United States citizen residing at 12509 Cedar Rd., Number 7, Cleveland Heights, Ohio 44106.

DESCRIPTION OF EVIDENCE SOUGHT

A. We request that the appropriate law enforcement authorities in the Cayman Islands contact Ms. Foster and Mr. Kirkconnell (separately) and obtain their testimony and records pertaining to their relationship with Steve Mitchell, including but not limited to their relationships culminating in the aforementioned real estate transaction of July 13, 1990. Questions which we would like to have posed to Ms. Foster and Mr. Kirkconnell (separately) include the following:

1. How, where, when, and through whom did you first meet or communicate with Steven Mitchell?
2. Was your relationship with Mitchell social or business, or both?
3. Who else was present or party to each of your meetings and/or communications with Mitchell, or persons representing Mitchell?
4. Do you know Mitchell by any other names?
5. What were the circumstances surrounding the transfer of Cayman Brac Central Block 101B, Parcel 72, to Mitchell? including:

- a. How was the transaction arranged?
- b. Who were the individuals and entities participating in, facilitating or witnessing the transaction, and how did these persons or entities come to be involved?
- c. What was your role in the transaction, and how did you come to be involved?
- d. In what form was payment made and received, and what was done with payment upon receipt?
- e. What fees were incurred in said transaction, what was the form of payment of said fees, and what was done with payment upon receipt?
- f. Please identify each and every meeting or communication you have had with any person or entity regarding said transaction?





(c) Entries on these documents were made at or near the time

(b) The original of these copies is kept and retained in the ordinary course of business and it is the regular practice of the business to make records of this type;

(a) The documents produced are true and exact copies of original records now in the custody of the business entity;

Under United States law, business records usually are admitted into evidence at trial only after the person offering them proves, through the testimony of a qualified witness, that:

as soon as possible. entities produce authenticated photocopies of the requested records Please have Ms. Foster and Mr. Kirkconnell and any other

PROCEDURE TO BE FOLLOWED

of Mr. Kirkconnell and Ms. Foster is taken. United States Attorney be allowed to be present when the testimony We further request that a federal agent and a special

B. We also request the identification, and production of authenticated copies of all records created and/or maintained by Ms. Foster and/or Mr. Kirkconnell regarding the aforementioned transaction of July 13, 1990. We also request the identification of any other individuals or entities associated with said transaction in any fashion (including but not limited to banks, real estate firms, law firms, insurance companies, title companies, etc.) and the identification, and production of authenticated copies, of all records created or maintained by such individuals or entities regarding said transaction.

7. Have you received any information, in any form and from any source at all, regarding Mitchell or any of his associates subsequent to the afore-mentioned transaction of July 13, 1990?

6. Have you had any contacts with Mitchell, or with any persons or entities representing Mitchell, prior or subsequent to the aforementioned transaction of July 13, 1990?

copies of any such documents which are in your possession or control. transaction, and please explain and produce

person with knowledge of those transactions; and

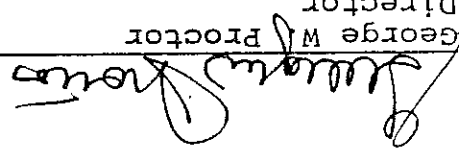
(d) The written declaration of the above facts, if falsely made, would subject the maker to criminal penalties under Cayman law.

Therefore, we request that photocopies of the bank records be authenticated in accordance with Form A appended to this request at Tab A. We further request that all photocopies be reproduced in such a manner that all information contained on the document (e.g., fronts and backs of documents) and that the photocopying or reproduction process be of a quality to ensure that the duplicate is legible, complete, and accurate. If copies are produced in lieu of originals, each copy should be identical, accurate, and a complete copy of the original.

Please ask each of the individuals who certifies the records if he or she would be willing to travel to the United States, at our expense, to testify regarding the authenticity of the records. If not, we may later request assistance in taking a deposition in the Cayman Islands on these issues.

Thank you for your assistance in this matter.

Date 25 June 92


George W. Proctor
Director
Office of International Affairs
Criminal Division



IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN, GRAND CAYMAN
CAUSE NO. *545* OF 1995

IN THE MATTER OF THE GRAND COURT LAW
SECTION 13

AND

IN THE MATTER OF THE MUTUAL LEGAL
ASSISTANCE
(UNITED STATES OF AMERICA) LAW, SCHEDULE,
ARTICLE 16

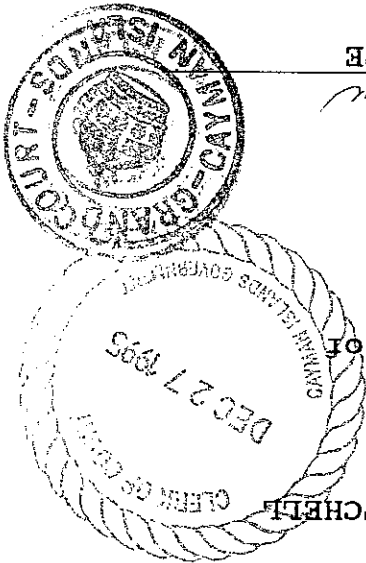
AND

IN THE MATTER OF THE MISUSE OF DRUGS LAW,
(DRUG TRAFFICKING OFFENCES)
(DESIGNATED COUNTRIES) ORDER, 1991
SECTION 6

AND

IN THE MATTER OF STEVEN MITCHELL

THIS IS EXHIBIT "SMB2" referred to in the affidavit of
Samuel Bulgin SWORN TO before me this *Monday* of
December 1995.



JUSTICE OF THE PEACE

[Handwritten signature]

IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN, GRAND CAYMAN
CAUSE NO. 545 OF 1995

IN THE MATTER OF THE GRAND COURT LAW
SECTION 13

AND

IN THE MATTER OF THE MUTUAL LEGAL
ASSISTANCE
(UNITED STATES OF AMERICA) LAW, SCHEDULE,
ARTICLE 16

AND

IN THE MATTER OF THE MISUSE OF DRUGS LAW,
(DRUG TRAFFICKING OFFENCES)
(DESIGNATED COUNTRIES) ORDER, 1991
SECTION 6

AND

IN THE MATTER OF STEVEN MITCHELL



THIS IS EXHIBIT "SMB3" referred to in the affidavit of
Samuel Bulgin SWORN TO before me this 22nd day of
December 1995.



[Signature]
JUSTICE OF THE PEACE

IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN, GRAND CAYMAN

CAUSE NO 435 OF 1995

IN THE MATTER OF THE REGISTERED LAND LAW (REVISED)



IN THE MATTER OF THE MUTUAL LEGAL ASSISTANCE
(UNITED STATES OF AMERICA) LAW,
SCHEDULE, ARTICLE 16

AND

IN THE MATTER OF THE MISUSE OF DRUGS LAW, SECTION 49 (1995
(REVISION)



AND

IN THE MATTER OF THE MISUSE OF DRUGS (DRUG TRAFFICKING OFFENCES)
(DESIGNATED COUNTRIES) ORDER 1991

AND

IN THE MATTER OF UNITED STATES OF AMERICA
AND STEVEN MITCHELL - CRIMINAL NO.1:93CR 317

CORAM: BINGHAM J.

ORDER

UPON hearing Crown Counsel for and on behalf of the
Attorney-General on the hearing of his ex parte originating
Summons dated 5th October 1995.

AND UPON reading the Affidavit of Crown Counsel Samuel W. Bulgin
filed on behalf of the Attorney-General.

IT IS ORDERED AS FOLLOWS:-

1. That the registration of any dealings with the following
parcel of land to wit:

Cayman Central, Block 101B, parcel 103,
be inhibited until further Order.

2. There be no order as to costs.

This order is filed by Crown Counsel Lisa Agard for and on behalf of the Attorney-General whose address for service is Legal Department Fourth Floor, Tower Building, Harbour Drive, George Town, Grand Cayman.



Dated this 27th day of October, 1995.
Filed this 27th day of October 1995
[Signature]
JUDGE OF THE GRAND COURT (acting)

IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN, GRAND CAYMAN
CAUSE NO. *S45* OF 1995

IN THE MATTER OF THE GRAND COURT LAW
SECTION 13

AND

IN THE MATTER OF THE MUTUAL LEGAL

ASSISTANCE

(UNITED STATES OF AMERICA) LAW, SCHEDULE,
ARTICLE 16

AND

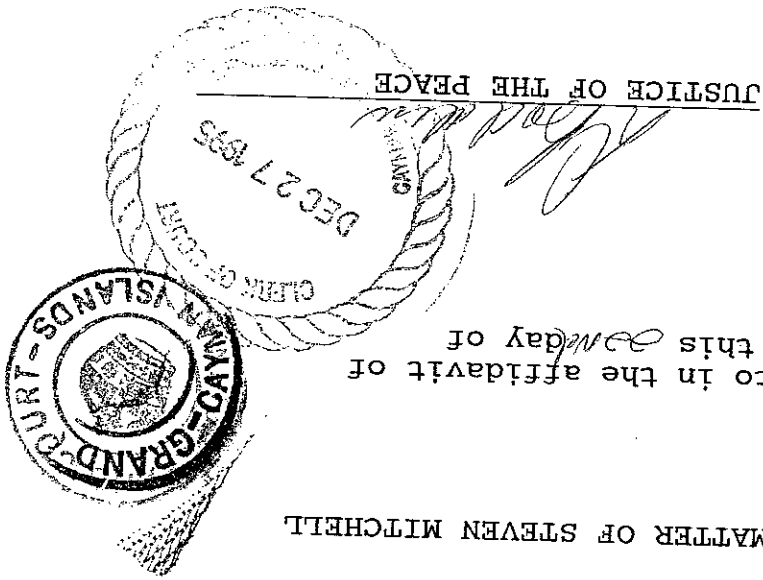
IN THE MATTER OF THE MISUSE OF DRUGS LAW,
(DRUG TRAFFICKING OFFENCES)

(DESIGNATED COUNTRIES) ORDER, 1991
SECTION 6

AND

IN THE MATTER OF STEVEN MITCHELL

THIS IS EXHIBIT "SWB4" referred to in the affidavit of
Samuel Bulgin SWORN TO before me this *Monday* of
December 1995.



WHEREAS, on October 13, 1993, the defendant STEVEN MITCHELL signed an agreement to plead guilty to a felony violation of 21 U.S.C. § 846; AND WHEREAS, said agreement included an agreement to forfeit property described below to the United States of America; NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED: That the following real property is forfeited to the United States of America:

That lot or parcel of land, together with its buildings, improvements, fixtures, attachments and easements, described in the Land Register for the Cayman Islands, Registration Section Cayman Brac

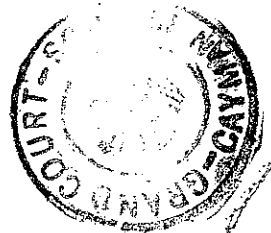
ORDER OF FORFEITURE

UNITED STATES OF AMERICA
 Plaintiff,
 v.
 STEVEN MITCHELL
 Defendant.

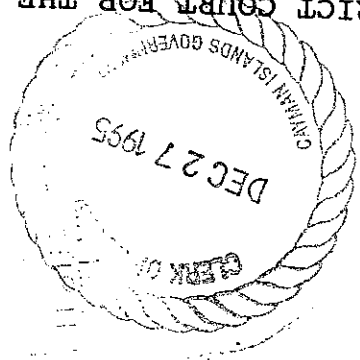
CRIMINAL NO.

JUDGE

1:93CR 317



IN THE UNITED STATES DISTRICT COURT FOR THE
 NORTHERN DISTRICT OF OHIO
 EASTERN DIVISION



LM 9111 9-00-95

Central, as Block 101B, Parcel Number 103, and being

further described in the Cayman Islands Transfer of

Land Instrument 4198/90 as Registration Section Cayman

Brac Central, Block 101B, Parcel Number 72.

2. That if any of the above-described forfeitable

property, as a result of any act or omission of the defendant --

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a

third person;

(3) has been placed beyond the jurisdiction of the court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be

subdivided without difficulty;

the defendant shall forfeit to the United States other specified

property up to the value of the above described forfeitable

property.

3. That the United States Attorney General or her designee

is authorized to seize any of the aforementioned property

pursuant to Federal Rule of Criminal Procedure 32(b)(2).

That should the United States notify the defendant that

it is in the interest of the United States for the defendant to

undertake to sell the aforementioned real property with the terms

of sale to be agreed upon in advance by the United States, or its

agents, and to repatriate the sales proceeds to be turned over to

UNITED STATES DISTRICT JUDGE

[Signature]

Dated this 10th day of December 1993

property in accordance with those terms.

the Attorney General, the defendant shall undertake to sell the

I ASK FOR THIS:

[Signature]
Christopher J. Supple
Special United States Attorney

Steven Mitchell, Defendant

[Signature]
Ted Stebbins, Esquire

Counsel for the Defendant

I hereby certify that this

instrument is a true and

correct copy of the original

as they lie in my office.

Attest Court R. Smith, Clerk

U. S. District Court

Northern District of Ohio

[Signature]
Deputy Clerk

IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN, GRAND CAYMAN
CAUSE NO. ~~545~~ OF 1995

IN THE MATTER OF THE GRAND COURT LAW
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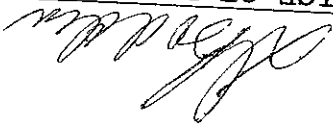
IN THE MATTER OF THE MISUSE OF DRUGS LAW,
(DRUG TRAFFICKING OFFENCES)
(DESIGNATED COUNTRIES) ORDER, 1991
SECTION 6

AND

IN THE MATTER OF STEVEN MITCHELL

THIS IS EXHIBIT "SMB5" referred to in the affidavit of
Samuel Bulgin SWORN TO before me this ~~22nd~~ day of
December 1995.

JUSTICE OF THE PEACE





Washington, D.C. 20530

May 16, 1995

His Lordship Anthony Smellie
Cayman Central Authority
Courts Building
Georgetown, Grand Cayman
Cayman Islands

Dear Mr. Smellie:

Re: Supplemental request for assistance in the STEVEN MITCHELL case

The United States requests your assistance under the Treaty for Mutual Legal Assistance in enforcing a final order of forfeiture against real property in the Cayman Islands. Enclosed is a certified copy of a Final Order of Forfeiture from the District Court for the Northern District of Ohio, Eastern Division entered in the criminal prosecution of Steven Mitchell. Also enclosed is a certified copy of a Final Order of Forfeiture for Mrs. Mitchell's interest in the above stated real property. The United States can confirm that the certified criminal forfeiture orders transmitted to the Cayman Central Authority are final orders under U.S. law and not subject to appeal.

We seek your assistance in enforcing this order as allowed under your domestic legislation and pursuant to Article 16 of the Treaty.

Sincerely,

George W. Proctor
Director
Office of International Affairs
Criminal Division

BY: *Betsy Burke*

Betsy E. Burke
Acting Associate Director

Enclosures

IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN, GRAND CAYMAN
CAUSE NO. *545* OF 1995

IN THE MATTER OF THE GRAND COURT LAW
SECTION 13

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IN THE MATTER OF THE MUTUAL LEGAL
ASSISTANCE
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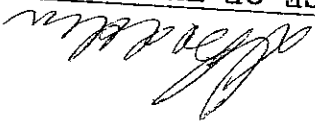
IN THE MATTER OF THE MISUSE OF DRUGS LAW,
(DRUG TRAFFICKING OFFENCES)
(DESIGNATED COUNTRIES) ORDER, 1991
SECTION 6

AND

IN THE MATTER OF STEVEN MITCHELL

THIS IS EXHIBIT "SWB" referred to in the affidavit of
Samuel Bulgin sworn to before me this *20th* day of
December 1995.

JUSTICE OF THE PEACE



THE MUTUAL LEGAL ASSISTANCE
(UNITED STATES OF AMERICA) LAW, 1986
LAW 16 OF 1986

CERTIFICATE PURSUANT TO SECTION 6
AND THE SCHEDULE, ARTICLE 1,
(PARAGRAPHS 2 (g) AND (h)) and ARTICLE 5
(PARAGRAPHS 1, 2 AND 3)

TO: THE SOLICITOR GENERAL

WHEREAS, it is my intention to give effect to a Request dated 13
May, 1995, by the United States Central Authority to the Cayman
Mutual Legal Assistance Authority for assistance in the criminal
prosecution of Steven Mitchell.

You are HEREBY REQUIRED pursuant to section 6 of the Mutual Legal
Assistance (United States of America) Law, 1986 and all other
powers hereunto enabling, to apply to the Grand Court of the
Cayman Islands for:

1. An order for the registration of the final order of forfeiture
(External confiscation order) in the matter of United States of
America v Stephen Mitchell Criminal No.1:93 CR317 (Forfeiture), in
the UNITED STATES DISTRICT COURT, FOR THE NORTHERN DISTRICT OF
OHIO EASTERN DIVISION, as it relates to that parcel of land,
registration section of Cayman Brac Central, Block 101B, Parcel
103, and being further described in the Cayman Islands Transfer of
Land Instrument 4198/90 as registration section Cayman Brac
Central, Block 101B, Parcel number 72.

2. Such further Orders or Directions as the said Grand Court
shall deem fit.

DATED this 12th day of December 1995.



Anthony Smellie, Q.C.
Grand Court Judge and
Cayman Mutual Legal
Assistance Authority

A handwritten signature in black ink, appearing to read "Anthony Smellie", is written over the printed name and title.

IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN, GRAND CAYMAN
CAUSE NO. 575 OF 1995

IN THE MATTER OF THE GRAND COURT LAW
SECTION 13

AND

IN THE MATTER OF THE MUTUAL LEGAL
ASSISTANCE

(UNITED STATES OF AMERICA) LAW, SCHEDULE,
ARTICLE 16

AND

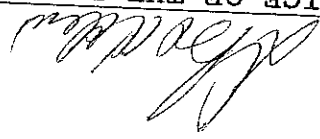
IN THE MATTER OF THE MISUSE OF DRUGS LAW,
(DRUG TRAFFICKING OFFENCES)
(DESIGNATED COUNTRIES) ORDER, 1991
SECTION 6

AND

IN THE MATTER OF STEVEN MITCHELL

THIS IS EXHIBIT "SMB7" referred to in the affidavit of
Samuel Bulgin SWORN TO before me this 22nd day of
December 1995.

JUSTICE OF THE PEACE



IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
Plaintiff,)
)
v.)
STEVEN MITCHELL)
)
Defendant.)
)
JUDGE LAMBROS)
)
CRIMINAL NO. 1:93CR317)

AFFIDAVIT OF LENA D. WATKINS

Comes now the undersigned, Lena D. Watkins, and respectfully submits this affidavit, and on oath states the following:

I have personal knowledge of the facts stated in this affidavit, and I am competent to testify to them.

1. I am employed by the United States Department of Justice where I serve as a Trial Attorney in the Narcotic and Dangerous Drug Section of the Criminal Division, and I have been so employed for approximately five (5) years.

2. In the course of my duties, I was assigned as a Special United States Attorney in the Northern District of Ohio and, in that capacity, I was one of the prosecutors who handled the

criminal case against Steven Mitchell as set forth in the style above.

3. From my handling of the criminal case, I know the

following:

(a) Steven Mitchell pleaded guilty to conspiracy to

Manufacture Marijuana Plants, and a criminal order of forfeiture
condemning and forfeiting the following property was entered with

his consent on December 6, 1993:

That lot or parcel of land, together with its buildings,
improvements, fixtures, attachments and easements, described
in the Land Register for the Cayman Islands, Registration
Section Cayman Brac Central, as Block 101B, Parcel Number
103, and being further described in the Cayman Islands
Transfer of Land Instrument 4198/90 as Registration Section
Cayman Brac Central, Block 101B, Parcel Number 72.

(b) Steven Mitchell has not appealed his conviction or

sentence entered on November 9, 1994 and amended as to the term

of incarceration on January 30, 1995.

4. Under the time periods set forth in the United States

Federal Rules of Civil and Criminal Procedure, Steven Mitchell is

now time barred from filing an appeal as to the criminal

forfeiture of this property rendered after his guilty plea on

December 6, 1993.

My Commission Expires July 14, 1977

Staff Counsel
Title

Signature of Notary or
Other Officer Authorized
to Take Oaths and Affirmations

[Signature]

(Notary Seal)

November, 1975.

Subscribed and sworn (affirmed) before me this 7th day of

WASHINGTON, DISTRICT OF COLUMBIA

Lena D. Watkins
Trial Attorney
Narcotic and Dangerous Drug Section
Criminal Division
United States Department of Justice

[Signature]

true and correct.

I declare under penalty of perjury that the foregoing is

5. Further, the affiant sayeth not.