

PICK & BOYDSTON, LLP

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

617 S. OLIVE STREET, SUITE 400

LOS ANGELES, CA 90014-1644

TELEPHONE (213) 624-1996

FACSIMILE (213) 624-9073

November 16, 2010

For Confidential Settlement Purposes Only

Via Certified Mail and E-Mail

David Marchant
Publisher, OffshoreAlert
123 SE 3rd Avenue, #173
Miami, FL 33131
marchant@offshorealert.com (Email)
www.offshorealert.com (Web)

Re: Demand for Removal from www.offshorealert.com of Defamatory Posts Regarding Roland Bleyer

Dear Mr. Marchant:

We represent Roland Bleyer and have been advised of the following:

I. Introduction

You have been contacted previously by Mr. Bleyer and his counsel regarding posts and threads appearing at <http://www.offshorealert.com> (the "Website"), including, *e.g.*, posts appearing at http://www.offshorealert.com/message_board_detail.asp?id=62625&page=1 and http://www.offshorealert.com/message_board_detail.asp?id=34191&page=211. As set forth fully below, we renew our request for removal of the offending posts.

II. Defamatory statements about Mr. Bleyer appear on your website.

Defamatory posts regarding Mr. Bleyer appear on your website at, *inter alia*, http://www.offshorealert.com/message_board_detail.asp?id=62625&page=1 and http://www.offshorealert.com/message_board_detail.asp?id=34191&page=211. The threads contain numerous falsities - the damage from which is self-evident. Among other things, the threads allege that Mr. Bleyer participated in criminal activities, and repeatedly refer to Mr. Bleyer's "victims." The most damaging post, by an individual using the screen name "ShoreLine" on July 24, 2010, alleges that Mr. Bleyer was involved in a criminal conspiracy, pursuant to which "Roland Frank Bleyer offer[ed] to assist the victim [of an earlier alleged fraud] in recovering his previous loss if he invested another \$363,000 (USD) in another project." The allegations in the post appear to have been obtained from the indictment in *United States v. Obioha, et al.*, 2:99-cr-00354-DFL (U.S. Dist. Ct. E.D. Cal.); however, Mr. Bleyer did not

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participate in the alleged scheme, and was not, in fact arrested in connection with this matter. Furthermore, as you know, the United States government dismissed all charges against Mr. Bleyer on or about January 16, 2002. A post by "Lardie" on October 8, 2006 falsely states that Mr. Bleyer and his associates "have NO SUCH MONEY as they claim, and they have taken well over a million dollars from people as 'advanced fees' for project funding, and have never performed as agreed."

III. Your Liability for Publishing the Statements against Mr. Bleyer

Based on the foregoing, Mr. Bleyer has legal claims against you for defamation (libel *per se*) and false light. In addition, your continuing failure to take down the Website and statements contained therein may constitute a legal cause of action for negligent and/or intentional interference with prospective economic relations.

A. Defamation – Libel Per Se

Published statements which require no further explanation to render them defamatory are considered libelous on their face (*i.e.*, libel *per se*). Where, as here, a private figure files a libel *per se* action about a matter of private concern, the defendant will be found liable where: (i) the statement was made to a person other than the plaintiff; (ii) the person to whom the statement was made reasonably understood the statement; (iii) the person reasonably understood the statements to be defamatory *per se*; and (iv) the defendant failed to use reasonable care to determine the truth or falsity of the statement. Cal. Civ. Jury Instr. (CACI) 1704; Cal. Civ. Code § 45a.

The statements above concern Mr. Bleyer' purported criminal activities and lack of professional competence, and they all tend directly to injure Mr. Bleyer in both his personal and professional capacity. Because they require no explanation to make them defamatory, these statements are considered libelous on their face. Your publication of these statements to third parties on the internet and in email communications, without regard to their truth or falsity, therefore makes you liable for libel *per se*.

In an action for libel *per se*, damages are presumed: *I.e.*, recovery does not require proof of any special damages. Cal. Civ. Code § 45a. In addition to damages to his business and professional reputation, Mr. Bleyer will therefore be entitled to general damages for loss of reputation, shame, and hurt feelings pursuant to California Civil Code Section Section 48a(4)(a). *See* Cal. Civ. Jury Instr. (CACI) 1704. In addition, because the statements above appear to have been made with actual malice, as well as the intent to harm Mr. Bleyer, Mr. Bleyer will have a claim for punitive damages pursuant to California Civil Code Sections 48a(4)(c-d) and 3294.

Ordinarily, under the Communications Decency Act of 1996 ("CDA"), internet service providers are not liable for defamatory content posted by their users *so long as they engage in passive conduct* - commonly known as Section 230 immunity. Fair Hous. Council v. Roommates.com, LLC, 521 F.3d 1157, 1162 (9th Cir. 2008); see also 47 U.S.C. §230(f)(3). Courts have held this to mean that in order to gain the protection of the CDA's safe harbor

provision, the internet service provider must not engage in any meaningful editorial conduct embellishing or promoting the defamatory content. *Id.*

It is yet to be settled whether a website that purports to offer an “investigative” newsletter would be deemed an “internet service provider” according to the CDA’s statutory language. We would argue that your site is not entitled to the “internet service provider” designation for purposes of immunity. Nonetheless, even if your website is deemed an internet service provider, in this particular instance, you will not be eligible for the CDA safe harbor exception because your site is not acting in a merely passive manner. Your site is commercial in nature and contains several advertisements on the pages containing the posts in question. You have also made posts on other websites about the defamatory content (including, *e.g.*, at <http://highyieldfinanceforums.yuku.com/topic/2971>) thereby promoting the Website by reference to the defamatory content. Additionally, the defamatory content appears in meta-tags and the source code of the page – which provides search engine optimization benefits for your website much to the detriment of Mr. Bleyer. All in all, therefore, you have derived monetary value from the defamatory acts of your users, and are thereby excluded from the safe harbor provisions of the CDA and subject to liability for defamation.

B. False Light

Recovery for false light requires a plaintiff to prove: (i) that the defendant publicly disclosed information or material that showed the plaintiff in a false light; (ii) that the false light created by the publication would be highly offensive to a reasonable person in plaintiff’s position; (iii) that the defendant knew the publication would create such false impression, acted with disregard for the truth, or was negligent in determining the truth of the information or whether a false impression would be created; and (iv) that defendant’s conduct was a substantial factor in causing harm to the plaintiff. Cal. Civ. Jury Instr. (CACI) 1802; *see, e.g., Gill v. Curtis Publishing Co.*, 239 P.2d 630 (Cal. 1952).

The statements posted about Mr. Bleyer on the Website portray Mr. Bleyer in a false light which would be highly offensive to a reasonable person in his position. The damning allegations against Mr. Bleyer on the Website therefore give rise to a legal cause of action against you for false light.

C. Negligent and Intentional Interference with Prospective Economic Relations

We proceed under the assumption that you will remove the offending posts about Mr. Bleyer, due to the legal consequences if you fail to do so. However, if you refuse to do so, we may advance additional causes of actions against you in a formal legal complaint. These additional causes of action may include, *inter alia*, allegations of negligent and intentional interference with prospective economic relations. These actions would be grounded in your present, actual knowledge of the adverse consequences that Mr. Bleyer may suffer in his trade and business because of your publication of false stories about him on the Website. At this point, any refusal by you to remove the offending posts will be construed as an intentional interference with Mr. Bleyer’s prospective economic relations, and you will be held liable for

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any lost revenue incurred by Mr. Bleyer in his legitimate efforts to pursue his trade or business.

Liability for the tort of negligent and intentional interference with prospective economic relations requires proof of the following elements: (i) a business relationship between the plaintiff and a third party that would have resulted in an economic benefit to the plaintiff; (ii) knowledge by the defendant of the relationship; (iii) intent to harm the plaintiff by preventing the relationship, or negligence thereby; (iv) wrongful conduct by the defendant; and (v) actual harm to the plaintiff as a result of the defendant's conduct. Cal. Civ. Jury Instr. (CACI) 2202; *see, e.g., Buckaloo v. Johnson*, 14 Cal.3d 815, 827 (1975).

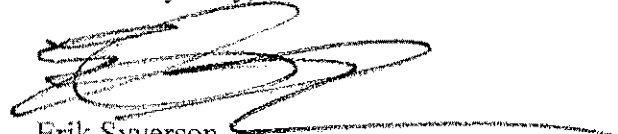
Mr. Bleyer maintains business relationships which, if they continue, will result in an economic benefit to Mr. Bleyer. You are now on notice of the harm that has been caused and will continue to be caused to these relationships, and to Mr. Bleyer thereby, due to the statements posted on the Website. With this knowledge, you can be found to have both the necessary intent and/or the demonstrated negligence to interfere with Mr. Bleyer's prospective economic relations, if you fail to remove the offending posts.

IV. Demand and Conclusion

At this stage of the matter, we are willing to forego formal litigation against you if you agree to immediately remove the posts and threads described above. In addition, you must erase these posts and threads from your indexing system and cache so that internet searches for either Bleyer or Roland Bleyer will not locate them. Finally, you must erase any reference to Mr. Bleyer from any and all source code and/or metatags on your site.

Please contact me immediately by telephone or email to discuss whether you intend to comply with the demands contained in this letter. In the event I do not hear from you within five (5) business days, or that you refuse to comply with the demands herein, we reserve our right to pursue any and all legal and equitable remedies available against you in a court of law. To this end, we will file the enclosed lawsuit.

Yours very truly,



Erik Syverson
PICK & BOYDSTON LLP

enclosure

1 Erik S. Syverson (SBN 221933)
2 PICK & BOYDSTON, LLP
3 617 South Olive Street, Suite 400
4 Los Angeles, CA 90014
5 Phone: 213-624-1996
6 Fax: 213-624-9073

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11 Attorneys for Plaintiffs Roland Frank Bleyer

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

ROLAND FRANK BLEYER, an individual)

Plaintiffs,)

v.)

DAVID MARCHANT, an individual; KYC)
NEWS, INC., a Florida corporation; and DOES)
1 through 50,)

Defendants.)

Case No.

COMPLAINT

[UNLIMITED JURISDICTION]

(1) Trade Libel

(2) Defamation

(3) False Light

(4) Intentional Interference with Contract

(5) Intentional Interference with Prospective
Economic Advantage

(6) Negligent Interference with Economic
Advantage

(7) California Business & Professions Code §
17200

(8) Injunctive Relief

JURY TRIAL DEMANDED

1
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3 **PARTIES**

4 1. Plaintiff Roland Frank Bleyer is, and at all relevant times was, an individual and a resident of
5 Australia. Mr. Bleyer shall be referred to herein as the "Plaintiffs."

6 2. Plaintiffs are informed and believe that Defendant KYC News, Inc. ("KYC") is a Florida
7 corporation, with its headquarters in Miami, Florida. Plaintiffs are informed and believe that KYC
8 publishes a purported investigative newsletter on the internet at <http://www.offshorealert.com> (the
9 "Website"), with paid subscribers in California and worldwide.

10 3. Plaintiffs are informed and believe that Defendant David Marchant ("Mr. Marchant") is, and
11 at all relevant times, was a resident of Miami, Florida, as well as the owner of KYC.

12 4. Plaintiffs are ignorant of the true names and capacities of Defendants sued herein as Does 1
13 through 50, inclusive, and therefore sues these Defendants by such fictitious names. Plaintiffs will
14 amend this complaint to allege their true names and capacities when ascertained. Plaintiffs are
15 informed and believe and thereon allege that each of such fictitiously named Defendants is
16 responsible in some manner for the occurrences herein alleged, and that Plaintiffs' injuries as herein
17 alleged were proximately caused by these Defendants' acts.

18 5. Defendants Does 1 through 50, inclusive, were the agents, servants, employees, alter-egos,
19 instrumentalities, representatives, co-venturers, co-conspirators and partners of each of the other
20 Defendants, including KYC and Mr. Marchant, and in doing the things hereinafter alleged, were
21 acting in the scope of their authority as such agents, servants, employees, alter-egos,
22 instrumentalities, representatives, co-venturers, co-conspirators, and partners and with the
23 permission and consent of their co-Defendants and as such share liability with each other with
24 respect to said matters complained of herein. Defendants KYC, Marchant and Does 1 through 50,
25 inclusive, shall be collectively referred to herein as "Defendants" or the "Marchant Defendants").

26 **INTRODUCTION**

27 6. As described fully herein, Mr. Marchant runs a for-profit "investigative" website (the
28 "Website," as defined fully below), on which he hosts a forum where he permits all manner of

1 sensational, defamatory content, in order to boost his own reputation and profits.

2
3 7. On or about August 2010, Plaintiffs became aware of negative, defamatory and
4 inflammatory postings on the Website about the Plaintiffs. Among other things, the Website
5 contains postings which allege that Mr. Bleyer participated in criminal activities, refer to Mr.
6 Bleyer's "victims," and allege that Plaintiffs are merely shell corporations, *i.e.*, fronts for fraudulent
7 activities by Mr. Bleyer and his business associates.

8 8. As a direct result of Mr. Marchant's conduct, Plaintiffs have suffered, and continue to suffer,
9 direct and consequential damages in an amount to be proven at trial. Plaintiffs have also suffered,
10 and continue to suffer, irreparable harm to their reputation and ongoing business relationships. If
11 Mr. Marchant's wrongful conduct continues, then among other things, Plaintiffs will be forced into
12 bankruptcy. Because Mr. Marchant's conduct has already damaged Plaintiffs as described herein,
13 and because his continuing conduct threatens to cause Plaintiffs irreparable injury, Plaintiffs have
14 had no choice but to file this action.

15 9. The damage caused by Mr. Marchant's defamatory website has been multiplied because the
16 website appears among the results of search engine searches for each Plaintiff's name, including
17 variations thereof.

18 GENERAL ALLEGATIONS

19 10. The Plaintiffs (as defined above) each provide financial services on the international market,
20 including providing and/or arranging multimillion dollar loans to fund government and private
21 development projects.

22 11. David Marchant, through KYC, owns and operates a website at www.OffshoreAlert.com
23 (the "Website"), which he holds out as an "investigative" newsletter. The Website hosts a forum
24 (the "Forum"), on which Mr. Marchant publishes posts by individuals who are generally identified
25 only by a username and email address (if they are identified at all). As in this case, posts may
26 include unsubstantiated rumors and falsehoods. The forum contains advertising for KYC's for-
27 profit services, including paid subscription and document-retrieval services.

28 12. On or about August 2010, Mr. Bleyer learned about negative posts appearing on the Forum

1 about him and the Plaintiffs ("Posts"), including the posts described below.

2
3 13. In a post dated July 24, 2010, an individual with the username ShoreLines described a
4 purported scheme for which federal criminal charges were filed, and stated, *inter alia*:

5 During November 1997, [the lead defendant] held himself out as a "trader"
6 who along with [third parties] were hammering out agreements involving a
7 gold deal and \$1,000,000 (USD) million private placement trading program
8 scheme . . . "[O]n August 27, 1999 [the lead defendant] got arrested as did his
9 criminal co-defendants Roland Bleyer (Beverly Hills, California, USA) [and
10 others] amidst their private placement investment deal that eventually
11 involved a Sacramento, California victim losing almost \$1,000,000 (USD)
12 he invested through [the lead defendant] who was given \$500,000,000 (USD
13) towards a \$15,000,000 'construction loan' investment program that was to
14 pay the victim \$650,000 (USD) in only 2-weeks.

15 The same Sacramento, California victim, after having lost \$500,000 (USD)
16 with [the lead defendant], was approached by Roland Frank Bleyer offering to
17 assist the victim in recovering his previous loss if he invested another
18 \$363,000 (USD) in another project. In total, the victim lost \$863,000 (USD
19) - almost \$1,000,000 (USD) million.

20

21 It appears they got away with it because they all got arrested and released.

22
23 14. This post (the "ShoreLines Post"), which appears at
24 http://www.offshorealert.com/message_board_detail.asp?id=62625&page=1, is false. The
25 allegations in the post appear to have been obtained from the indictment in *United States v. Obioha,*
26 *et al.*, 2:99-cr-00354-DFL (U.S. Dist. Ct. E.D. Cal.); however, Mr. Bleyer did not participate in the
27 alleged scheme; he was not, in fact, arrested in connection with this matter; and all charges against
28 him were dropped on or about January 16, 2002.

29 15. In a post dated October 8, 2006, an individual with the username "lardie" attacked Mr.
30 Bleyer and the Plaintiffs, stating, *inter alia*:

31 **Re: To all victims of Roland Bleyer**

32

33 This is a "heads up" to beware of Roland Frank BLEYER who hides behind
34 several companies, one of which is Project Equity Services Group (PESG) . . .
35 . ¶

36 Even though they appear to be a large and financially-strong company, there
37 are only 3 people . . . who comprise the companies which front for Bleyer.
38

1 The names of the other companies Bleyer hides behind are:

2 Project Equity Nominees (PEN)
3 Project Equity Trustees (PET)
4 MM Securities Australia Pty, Ltd
5 B&G Credit International (Singapore) Pte Ltd
6 Ryneye Pty Limited
7 Union Capital Pty
8 Needlegrove Investments Pty Limited

9 These blokes are claiming to have billions of dollars for project funding and
10 to buy/sell Chinese cattle, Russian oil, Filipino gold, Nigerian refineries, etc.

11 After conducting due diligence on them over the past 60 days, I have
12 concluded that these blokes have NO SUCH MONEY as they claim, and they
13 have taken well over a million dollars from people as "advanced fees" for
14 project funding, and have never performed as agreed.

15 I have names and coordinates of many of the victims, and I have the name and
16 phone number of a Constable with the Queensland police who is aware of Mr.
17 Bleyer's fraudulent schemes and the identities of some people who claim to be
18 victims who have lost money to Bleyer and his band of thieves.

19 Here is a link to a web site that has been set up by a victim

20 16. This post (the "Lardie Post"), which appears at
21 http://www.offshorealert.com/message_board_detail.asp?id=34191&page=211, is false. Mr. Bleyer
22 and the Plaintiffs have the necessary funding to conduct their business, and have not participated in
23 any "fraudulent schemes" as alleged therein. True and correct copies of the ShoreLines Post and the
24 Lardie Post are attached hereto as Exhibit "A," and incorporated herein by reference.

25 17. Mr. Marchant and KYC have benefited financially from the Posts; in addition to promoting
26 the Website by posting advertisements on the Forum, Mr. Marchant and KYC have also directed
27 attention to the Website by writing about the Posts on other websites, including, *e.g.*,
28 <http://highyieldfinanceforums.yuku.com/topic/2971>. Additionally, the defamatory content appears
in the Website's meta-tags and source code – which provides search engine optimization benefits
much to the detriment of Mr. Bleyer.

18. The Marchant Defendants' conduct has caused actual disruption to Plaintiffs' contractual,
economic, and business relationships. Plaintiffs' income depends on their ability to close large
financial transactions, which depends in turn on their reputation. However, since the postings
appeared on the Website, Mr. Bleyer has received correspondence from several potential business

1 partners, stating that they cannot do business with him, due to questions raised by negative posts
2 appearing on the internet. As stated in one letter:

3
4 [A]s a result of the investment firms continuing to error on the side of caution,
5 I can not move our pending transactions forward because of the negative and
6 derogative statements that can still be found on the Worldwide Web about
7 you and your firm. I firmly believe that once you are able to fully address
8 these claims and hav[e] them removed [from] the Worldwide Web; [we] will
9 be able to move forward with these projects.

10 19. Another business associate stated, "I have recently had some disturbing posts brought to my
11 attention. They all, in one way or another, depict you and various associated persons as conmen and
12 fraudsters," and identified the Website as one source of the offending postings.

13 20. Mr. Marchant has refused a written request by Mr. Bleyer to remove the offending Posts,
14 despite being informed of the damage to Plaintiffs. Mr. Marchant therefore clearly intended his
15 conduct to cause injury to the Plaintiffs - and it was done with a willful disregard of Plaintiffs'
16 rights, including their privacy and property rights. By engaging in the conduct described herein, Mr.
17 Marchant subjected Plaintiffs to cruel and unjust hardship in knowing disregard of their rights.

18 21. The damage caused by the Posts has been multiplied because links to the Posts appear
19 among the results of internet search engine searches for each Plaintiff's name (including variations
20 thereof).

21 DAMAGES

22 22. As a result of the foregoing conduct by Defendants, Plaintiffs have each suffered, and
23 continue to suffer, direct and consequential damages in an amount to be proven at trial. In addition,
24 Plaintiffs have each suffered, and continue to suffer, irreparable harm to their reputation and
25 ongoing business relationships.

26 23. Among other things, Plaintiffs conduct large financial transactions with third parties, who -
27 due to the potential risk, and the large amounts of money involved - understandably demand that
28 Plaintiffs maintain a squeaky-clean reputation. However, due to the negative internet postings,
Plaintiffs have lost prospective business partners and clients, and have been unable to close several
pending transactions. In addition to the loss of profits that would have accrued to Plaintiffs from
pending transactions that were actually cancelled, Plaintiffs have also lost business from existing

1 and prospective business partners and clients based on the injury to their reputation.

2
3 **24.** Because Mr. Marchant has refused to remove the Posts, Plaintiffs' damages are likely limited
4 not only to lost profits and lost clients; in addition, Plaintiffs risk the threat of business disruptions
5 including employee layoffs, unpaid bills, poor credit reports, damaged vendor relationships, creditor
6 lawsuits, and (potentially) bankruptcy.

7 **FIRST CAUSE OF ACTION**

8 **(Trade Libel)**

9 **(Against All Defendants)**

10 **25.** Plaintiffs incorporate by reference and re-alleges each and every allegation of paragraphs 1
11 through 24 as if set forth herein.

12 **26.** As described fully above, Defendants have published statements to third parties about
13 Plaintiffs that would tend to injure Plaintiffs' reputation in the community, and lessen their profits.
14 Specifically, as described fully above, Plaintiffs are informed and believe, and based thereon allege,
15 that Defendants have published Posts on the Website which state, *inter alia*, that Mr. Bleyer and
16 Plaintiffs participated in a criminal conspiracy.

17 **27.** As described fully above, the Posts are libelous on their face because they disparage the
18 quality of Plaintiffs' services and contain defamatory meanings, as opposed to innocent meanings.
19 Furthermore, the Posts contain false and unprivileged statements about Plaintiffs that expose them to
20 hatred, contempt, ridicule or obloquy, or that cause Plaintiffs to be shunned or avoided, or which
21 have a tendency to injure Plaintiffs in their business and devalue their services, including their
22 ability to promote these services in the market.

23 **28.** As described fully above, the Posts are libelous on their face because they charge Plaintiffs
24 with dishonesty.

25 **29.** As described fully above, the Posts are libelous on their face because they charge Plaintiffs,
26 either explicitly or implicitly, with criminal activities (including fraud).

27 **30.** As described fully above, the Posts are libelous on their face because they charge Plaintiffs,
28 either explicitly or implicitly, with professional incompetence.

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2 31. Plaintiffs are informed and believe and, based thereon allege, that the Posts were seen and
3 read by hundreds to thousands of people all over the world, including Plaintiffs' current and
4 prospective clients and business partners.

5 32. Plaintiffs are informed and believe, and based thereon allege, that the Posts were known by
6 the Defendants to be false or the Defendants acted in reckless disregard of the truth when they
7 published these postings, knowing that the Posts would be viewed by Plaintiffs' current and
8 prospective clients and business partners.

9 33. As a result of Defendants' conduct, as described herein, Plaintiffs have suffered, and
10 continue to suffer, damages in an amount to be proven at trial, including without limitation past and
11 future lost profits, and injury to reputation, as well as other consequential damages to be proven at
12 trial. Plaintiffs' general and special damages, include, without limitation, lost revenue and profits as
13 a function of damage to Plaintiffs' business reputations; diminution in the pecuniary value of
14 Plaintiffs' good will; administrative costs in connection with Plaintiffs' efforts to monitor and
15 counteract the negative publicity with corrective publicity, and other pecuniary harm in excess of the
16 jurisdictional minimum, in an amount to be proven at trial.

17 34. Defendants are continuing to engage in the unlawful actions alleged herein, and unless
18 restrained and enjoined will continue to do so, causing irreparable harm to Plaintiffs. It is difficult
19 to ascertain the amount of compensation that could afford Plaintiffs adequate relief for Defendants'
20 continuing unlawful acts. Plaintiffs' remedy at law is, therefore, inadequate to compensate for the
21 injuries threatened.

22 35. In addition, Plaintiffs are informed and believe, and based thereon allege, that the Posts were
23 written and published by Defendants with malice and/or oppression in that the content of the
24 postings contain false, defamatory statements that were known by Defendants to be false, and their
25 publication was deliberately done for Defendants' own profit, with complete and reckless disregard
26 for the reputations of Plaintiffs and their services, as well as their privacy and property rights, and
27 their ability to pursue their business and to participate in society without being shunned thereby.
28 Plaintiffs are further informed and believe, and based thereon allege, that Mr. Marchant intended his

1 conduct to cause injury to the Plaintiffs. By engaging in the conduct described herein, Mr. Marchant
2 subjected Plaintiffs to cruel and unjust hardship in knowing disregard of their rights, and Plaintiffs
3 are therefore entitled to punitive damages.
4

5 **SECOND CAUSE OF ACTION**

6 **(Violation of California Civil Code §§ 43 *et seq.* - Defamation/Label)**

7 **(Against All Defendants)**

8 36. Plaintiffs incorporate by reference and re-alleges each and every allegation of paragraphs 1
9 through 35 as if set forth herein.

10 37. As described fully above, Defendants have published statements to third parties about
11 Plaintiffs that would tend to injure Plaintiffs' reputation in the community, and lessen their profits.

12 38. Specifically, as described fully above, Plaintiffs are informed and believe, and based thereon
13 allege, that Defendants have published Posts on the Website which state, *inter alia*, that Mr. Bleyer
14 and Plaintiffs participated in a criminal conspiracy.

15 39. As described fully above, the Posts purported to provide factual data about Plaintiffs.

16 40. As described fully above, the Posts were false.

17 41. As described fully above, the Posts are libelous on their face because they charge Plaintiffs
18 with dishonesty.

19 42. As described fully above, the Posts are libelous on their face because they charge Plaintiffs,
20 either explicitly or implicitly, with criminal activities (including fraud).

21 43. As described fully above, the Posts are libelous on their face because they charge Plaintiffs,
22 either explicitly or implicitly, with professional incompetence.

23 44. As a result of Defendants' conduct, as described herein, Plaintiffs have suffered, and
24 continue to suffer, damages in an amount to be proven at trial, including without limitation past and
25 future lost profits, and injury to reputation, as well as other consequential damages to be proven at
26 trial. Plaintiffs' general and special damages, include, without limitation, lost revenue and profits as
27 a function of damage to Plaintiffs' business reputations; diminution in the pecuniary value of
28 Plaintiffs' good will; administrative costs in connection with Plaintiffs' efforts to monitor and

1 counteract the negative publicity with corrective publicity, and other pecuniary harm in excess of the
2 jurisdictional minimum, in an amount to be proven at trial.

3
4 45. Defendants are continuing to engage in the unlawful actions alleged herein, and unless
5 restrained and enjoined will continue to do so, causing irreparable harm to Plaintiffs. It is difficult
6 to ascertain the amount of compensation that could afford Plaintiffs adequate relief for Defendants'
7 continuing unlawful acts. Plaintiffs' remedy at law is, therefore, inadequate to compensate for the
8 injuries threatened.

9 46. In addition, Plaintiffs are informed and believe, and based thereon allege, that the Posts were
10 written and published by Defendants with malice and/or oppression in that the content of the
11 postings contain false, defamatory statements that were known by Defendants to be false, and their
12 publication was deliberately done for Defendants' own profit, with complete and reckless disregard
13 for the reputations of Plaintiffs and their services, as well as their privacy and property rights, and
14 their ability to pursue their business and to participate in society without being shunned thereby.
15 Plaintiffs are further informed and believe, and based thereon allege, that Mr. Marchant intended his
16 conduct to cause injury to the Plaintiffs. By engaging in the conduct described herein, Mr. Marchant
17 subjected Plaintiffs to cruel and unjust hardship in knowing disregard of their rights, and Plaintiffs
18 are therefore entitled to punitive damages.

19
20 **THIRD CAUSE OF ACTION**

21 **(False Light)**

22 **(Against All Defendants)**

23 47. Plaintiffs incorporate by reference and re-alleges each and every allegation of paragraphs 1
24 through 46 as if set forth herein.

25 48. As described fully above, Defendants have published statements to third parties about
26 Plaintiffs that would tend to show Plaintiffs in a false light. Specifically, as described fully above,
27 Plaintiffs are informed and believe, and based thereon allege, that Defendants have published Posts
28 on the Website which state, *inter alia*, that Mr. Bleyer and Plaintiffs participated in a criminal

1 conspiracy, and which give the false impression that that Mr. Bleyer is a dishonest, fraudulent
2 "conman," and that Plaintiffs are merely shell corporations, with no assets.

3
4 49. As described fully above, Defendants published these statements on the Website.

5 50. The false light created by the publication of these statements would be highly offensive to a
6 reasonable person in Plaintiffs' position, because they accuse Plaintiffs of criminal conduct and lack
7 of business competence.

8 51. As a result of Defendants' conduct, as described herein, Plaintiffs have suffered, and
9 continue to suffer, damages in an amount to be proven at trial, including without limitation past and
10 future lost profits, and injury to reputation, as well as other consequential damages to be proven at
11 trial. Plaintiffs' general and special damages, include, without limitation, lost revenue and profits as
12 a function of damage to Plaintiffs' business reputations; diminution in the pecuniary value of
13 Plaintiffs' good will; administrative costs in connection with Plaintiffs' efforts to monitor and
14 counteract the negative publicity with corrective publicity, and other pecuniary harm in excess of the
15 jurisdictional minimum, in an amount to be proven at trial.

16 52. Defendants are continuing to engage in the unlawful actions alleged herein, and unless
17 restrained and enjoined will continue to do so, causing irreparable harm to Plaintiffs. It is difficult
18 to ascertain the amount of compensation that could afford Plaintiffs adequate relief for Defendants'
19 continuing unlawful acts. Plaintiffs' remedy at law is, therefore, inadequate to compensate for the
20 injuries threatened.

21 53. In addition, Plaintiffs are informed and believe, and based thereon allege, that the Posts were
22 written and published by Defendants with malice and/or oppression in that the content of the
23 postings contain false, defamatory statements that were known by Defendants to be false, and their
24 publication was deliberately done for Defendants' own profit, with complete and reckless disregard
25 for the reputations of Plaintiffs and their services, as well as their privacy and property rights, and
26 their ability to pursue their business and to participate in society without being shunned thereby.
27 Plaintiffs are further informed and believe, and based thereon allege, that Mr. Marchant intended his
28 conduct to cause injury to the Plaintiffs. By engaging in the conduct described herein, Mr. Marchant

1 subjected Plaintiffs to cruel and unjust hardship in knowing disregard of their rights, and Plaintiffs
2 are therefore entitled to punitive damages.

3
4 **FOURTH CAUSE OF ACTION**

5 **(Intentional Interference with Contract)**

6 **(Against All Defendants)**

7 54. Plaintiffs incorporate by reference and re-alleges each and every allegation of paragraphs 1
8 through 53 as if set forth herein.

9 55. As described fully above, Plaintiffs have entered into contracts with clients and business
10 partners, pursuant to which (among other things) Plaintiffs provide financial services, including
11 providing and/or arranging multimillion dollar loans to fund government and private development
12 projects .

13 56. As described fully above, Defendants knew of such contractual relationships.

14 57. As described fully above, Defendants engaged in intentional acts to disrupt Plaintiffs'
15 contracts with their clients by, *inter alia*, publishing the Posts on the Website.

16 58. As described fully above, there was actual disruption of the contracts between Plaintiffs and
17 their clients. Among other things, several of Plaintiffs' business partners and clients have canceled
18 pending financial transactions. In addition, the resulting damage to Plaintiffs' reputation as a
19 business partner has caused harm to Plaintiffs' contractual, economic and business relationships.

20 59. As a result of Defendants' conduct, as described herein, Plaintiffs have suffered, and
21 continue to suffer, damages in an amount to be proven at trial, including without limitation past and
22 future lost profits, and injury to reputation, as well as other consequential damages to be proven at
23 trial. Plaintiffs' general and special damages, include, without limitation, lost revenue and profits as
24 a function of damage to Plaintiffs' business reputations; diminution in the pecuniary value of
25 Plaintiffs' good will; administrative costs in connection with Plaintiffs' efforts to monitor and
26 counteract the negative publicity with corrective publicity, and other pecuniary harm in excess of the
27 jurisdictional minimum, in an amount to be proven at trial.

28 60. Defendants are continuing to engage in the unlawful actions alleged herein, and unless

1 restrained and enjoined will continue to do so, causing irreparable harm to Plaintiffs. It is difficult
2 to ascertain the amount of compensation that could afford Plaintiffs adequate relief for Defendants'
3 continuing unlawful acts. Plaintiffs' remedy at law is, therefore, inadequate to compensate for the
4 injuries threatened.

5
6 61. In addition, Plaintiffs are informed and believe, and based thereon allege, that the Posts were
7 written and published by Defendants with malice and/or oppression in that the content of the
8 postings contain false, defamatory statements that were known by Defendants to be false, and their
9 publication was deliberately done for Defendants' own profit, with complete and reckless disregard
10 for the reputations of Plaintiffs and their services, as well as their privacy and property rights, and
11 their ability to pursue their business and to participate in society without being shunned thereby.
12 Plaintiffs are further informed and believe, and based thereon allege, that Mr. Marchant intended his
13 conduct to cause injury to the Plaintiffs. By engaging in the conduct described herein, Mr. Marchant
14 subjected Plaintiffs to cruel and unjust hardship in knowing disregard of their rights, and Plaintiffs
15 are therefore entitled to punitive damages.

16 **FIFTH CAUSE OF ACTION**

17 **(Intentional Interference with Prospective Business Advantage)**

18 **(Against All Defendants)**

19 62. Plaintiffs incorporate by reference and re-alleges each and every allegation of paragraphs 1
20 through 61 as if set forth herein.

21 63. As described fully above, Plaintiffs maintain economic and business relationships with third
22 parties, pursuant to which (among other things) Plaintiffs provide financial services, including
23 providing and/or arranging multimillion dollar loans to fund government and private development
24 projects.

25 64. As described fully above, such economic and business relationships contain a probable
26 future economic benefit or advantage to Plaintiffs.

27 65. As described fully above, Defendants knew of the existence of such economic and business
28 relationships.

1 66. As described fully above, Defendants engaged in intentional, wrongful acts to disrupt such
2 economic and business relationships, by, *inter alia*, publishing the Posts on the Website.

3
4 67. As described fully above, there was actual disruption of such economic and business
5 relationships. Among other things, several of Plaintiffs' business partners and clients have canceled
6 pending financial transactions. In addition, the resulting damage to Plaintiffs' reputation as a
7 business partner has caused harm to Plaintiffs' contractual, economic and business relationships.

8 68. As a result of Defendants' conduct, as described herein, Plaintiffs have suffered, and
9 continue to suffer, damages in an amount to be proven at trial, including without limitation past and
10 future lost profits, and injury to reputation, as well as other consequential damages to be proven at
11 trial. Plaintiffs' general and special damages, include, without limitation, lost revenue and profits as
12 a function of damage to Plaintiffs' business reputations; diminution in the pecuniary value of
13 Plaintiffs' good will; administrative costs in connection with Plaintiffs' efforts to monitor and
14 counteract the negative publicity with corrective publicity, and other pecuniary harm in excess of the
15 jurisdictional minimum, in an amount to be proven at trial.

16 69. Defendants are continuing to engage in the unlawful actions alleged herein, and unless
17 restrained and enjoined will continue to do so, causing irreparable harm to Plaintiffs. It is difficult
18 to ascertain the amount of compensation that could afford Plaintiffs adequate relief for Defendants'
19 continuing unlawful acts. Plaintiffs' remedy at law is, therefore, inadequate to compensate for the
20 injuries threatened.

21 70. In addition, Plaintiffs are informed and believe, and based thereon allege, that the Posts were
22 written and published by Defendants with malice and/or oppression in that the content of the
23 postings contain false, defamatory statements that were known by Defendants to be false, and their
24 publication was deliberately done for Defendants' own profit, with complete and reckless disregard
25 for the reputations of Plaintiffs and their services, as well as their privacy and property rights, and
26 their ability to pursue their business and to participate in society without being shunned thereby.
27 Plaintiffs are further informed and believe, and based thereon allege, that Mr. Marchant intended his
28 conduct to cause injury to the Plaintiffs. By engaging in the conduct described herein, Mr. Marchant

1 subjected Plaintiffs to cruel and unjust hardship in knowing disregard of their rights, and Plaintiffs
2 are therefore entitled to punitive damages.

3
4 **SIXTH CAUSE OF ACTION**

5 **(Negligent Interference with Economic Advantage)**

6 **(Against All Defendants)**

7 71. Plaintiffs incorporate herein by reference the allegations of paragraphs 1 through 70 as if set
8 forth in full here.

9 72. As described fully above, Plaintiffs were in economic relationships with clients, that
10 probably would have resulted in a future economic benefit to Plaintiffs.

11 73. As described fully above, Defendants knew or should have known of the above described
12 relationships existing between Plaintiffs and their clients, because Mr. Bleyer informed Mr.
13 Marchant of such relationships.

14 74. As described fully above, Defendants knew or should have known that these relationships
15 would be disrupted if he failed to act with reasonable care.

16 75. As described fully above, Defendants failed to act with reasonable care.

17 76. As described fully above, Defendants engaged in wrongful conduct through, *inter alia*,
18 defamation, false light, and invasion of privacy.

19 77. As described fully above, the relationships were disrupted.

20 78. As a result of Defendants' conduct, as described herein, Plaintiffs have suffered, and
21 continue to suffer, damages in an amount to be proven at trial, including without limitation past and
22 future lost profits, and injury to reputation, as well as other consequential damages to be proven at
23 trial. Plaintiffs' general and special damages, include, without limitation, lost revenue and profits as
24 a function of damage to Plaintiffs' business reputations; diminution in the pecuniary value of
25 Plaintiffs' good will; administrative costs in connection with Plaintiffs' efforts to monitor and
26 counteract the negative publicity with corrective publicity, and other pecuniary harm in excess of the
27 jurisdictional minimum, in an amount to be proven at trial.

28 79. Defendants are continuing to engage in the unlawful actions alleged herein, and unless

1 restrained and enjoined will continue to do so, causing irreparable harm to Plaintiffs. It is difficult
2 to ascertain the amount of compensation that could afford Plaintiffs adequate relief for Defendants'
3 continuing unlawful acts. Plaintiffs' remedy at law is, therefore, inadequate to compensate for the
4 injuries threatened.

5
6 **EIGHTH CAUSE OF ACTION**

7 **(Violation of California Business & Professions Code §§ 17200 *et seq.*)**

8 **(Against All Defendants)**

9 80. Plaintiffs incorporate by reference and re-allege each and every allegation of paragraphs 1
10 through 79 as if set forth herein.

11 81. By engaging in the conduct described herein, Defendants have engaged in unlawful, unfair,
12 or fraudulent business acts or practices in violation of California Business & Professions Code §§
13 17200 *et seq.*

14 82. As a result of Defendants' conduct, as described herein, Plaintiffs have suffered, and
15 continue to suffer, damages in an amount to be proven at trial, including without limitation past and
16 future lost profits, and injury to reputation, as well as other consequential damages to be proven at
17 trial. Plaintiffs' general and special damages, include, without limitation, lost revenue and profits as
18 a function of damage to Plaintiffs' business reputations; diminution in the pecuniary value of
19 Plaintiffs' good will; administrative costs in connection with Plaintiffs' efforts to monitor and
20 counteract the negative publicity with corrective publicity, and other pecuniary harm in excess of the
21 jurisdictional minimum, in an amount to be proven at trial.

22 83. Defendants are continuing to engage in the unlawful actions alleged herein, and unless
23 restrained and enjoined will continue to do so, causing irreparable harm to Plaintiffs. It is difficult
24 to ascertain the amount of compensation that could afford Plaintiffs adequate relief for Defendants'
25 continuing unlawful acts. Plaintiffs' remedy at law is, therefore, inadequate to compensate for the
26 injuries threatened.

27 84. In addition, Plaintiffs are informed and believe, and based thereon allege, that the Posts were
28 written and published by Defendants with malice and/or oppression in that the content of the

1
2 postings contain false, defamatory statements that were known by Defendants to be false, and their
3 publication was deliberately done for Defendants' own profit, with complete and reckless disregard
4 for the reputations of Plaintiffs and their services, as well as their privacy and property rights, and
5 their ability to pursue their business and to participate in society without being shunned thereby.

6 Plaintiffs are further informed and believe, and based thereon allege, that Mr. Marchant intended his
7 conduct to cause injury to the Plaintiffs. By engaging in the conduct described herein, Mr. Marchant
8 subjected Plaintiffs to cruel and unjust hardship in knowing disregard of their rights, and Plaintiffs
9 are therefore entitled to punitive damages.

10 **NINTH CAUSE OF ACTION**

11 **INJUNCTIVE RELIEF**

12 **(Against All Defendants)**

13 85. Plaintiffs incorporate by reference and re-allege each and every allegation of paragraphs 1
14 through 84 as if set forth herein.

15 86. As a direct and proximate result of Defendants' ongoing wrongful acts, Plaintiffs have
16 suffered and will continue to suffer substantial pecuniary losses and irreparable injury to their
17 business reputation and goodwill.

18 87. Plaintiffs have no adequate remedy at law to compensate them for the continuing injuries
19 inflicted by Defendants. Accordingly, Plaintiffs are entitled to temporary, preliminary and
20 permanent injunctive relief.

21 **PRAYER**

22 **WHEREFORE**, Plaintiffs respectfully request that the Court enter judgment against the
23 Defendants, and each of them, and provide Plaintiffs the following relief:

24 **AS TO ALL CAUSES OF ACTION**

25 Against all Defendants:

- 26 1. Compensatory damages in an amount according to proof at trial;
27 2. Interest in an amount according to proof at trial;
28 3. Restitution of any profits resulting to Defendants from the conduct alleged herein, in an

1 amount to be proven at trial;

2 4. Punitive damages;

3 5. A preliminary and permanent injunction ordering that Defendants immediately:

4 a. Remove from the Website all posts about Mr. Bleyer and/or the Plaintiffs,

5 b. Remove from the Website any and all identifying data, including without limitation
6 all meta-tags and source data, that would cause such posts to appear in a search for
7 any of the Plaintiffs;

8 c. Cease posting defamatory statements about Mr. Bleyer and/or the Plaintiffs;

9 d. Cease posting statements that would tend to place Mr. Bleyer and/or the Plaintiffs in
10 a false light;

11 e. Cease any and all interference with Plaintiffs' contractual, economic, and/or business
12 relationships, including without limitation publishing posts on the Website.

13 6. A declaratory judgment from this Court that the Defendants' postings about Plaintiffs are
14 defamatory and injurious to Plaintiffs' business or occupation; and

15 7. Attorney's fees and costs of suit herein incurred.

16 8. Such further relief as the Court deems just and proper.

17
18 **DEMAND FOR JURY TRIAL**

19 Plaintiffs hereby demand trial by jury of all issues so triable in this action.

20
21 DATED: _____, 2010

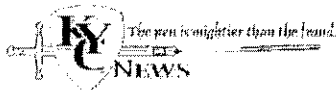
PICK & BOYDSTON, LLP

22 By: _____

23 Erik S. Syverson
24 Attorneys for Plaintiffs

OffshoreAlert 

EXHIBIT A



MESSAGE BOARD

This Message Board is intended to be a place where mature people can exchange information relevant to financial due diligence.

The editor reserves the right to delete messages, particularly those that he considers to be irrelevant, malicious and/or frivolous.

The IP addresses of the worst offenders will be banned from posting on the Message Board without any prior warning.

We wish to draw visitors' attention to the fact that most messages posted on Internet forums are done so anonymously and, as such, have limited value.

Also, it is not uncommon for the same person to post several messages under a variety of aliases to create the appearance that others support their views.

It is also worth pointing out that Internet message boards are often used by crooks to solicit their next victim and/or confuse existing victims by exposing them to false and/or misleading information.

Nevertheless, such forums can serve a useful purpose in the initial information gathering process when used responsibly.

Mack Allman Obioha, Wilfrado Saurin, et al. By ShoreLines on 7/24/2010 2:41:13 PM E-mail: shorelines@bluewin.ch

During November 1997 Robert John Skirving of FIDELITY INTERNATIONAL BANK INC. (FIB) introduced a fellow named Mack Allman Obioha (when he was about 50-yrs. old) to Gilbert Allen Ziegler (aka: Van Arthur Brink (Portland, Oregon, USA) of FIRST INTERNATIONAL BANK OF GRENADA LIMITED (FIBS).

Mack Allman Obioha was listed on several firms in Portland, Oregon, USA:

- HANES MORGAN & CO.; GEMSOURCE INTERNATIONAL INC.; GOLDENWEST CORP.; LINCOLN NATIONAL MORTGAGE CORP.

During November 1997, Mack Allman Obioha held himself out as a "trader" who along with Robert J. Skirving (Portland, Oregon, USA), Paul James Peiffer (aka: Jim Peiffer (Portland, Oregon, USA) and William Lesar IV (Falls Church, Virginia, USA) were hammering out agreements involving a gold deal and \$1,000,000 (USD) million private placement trading program scheme and amidst their communications almost 2-years later on August 27, 1999 Mack Allman Obioha (Portland, Oregon, USA) got arrested as did his criminal co-defendants Roland Beyer (Beverly Hills, California, USA), Jay Stevens (Los Angeles, California, USA), Tam McNamara (Ohio, USA) and Ann Henderson (Texas, USA) amidst their private placement investment deal that eventually involved a Sacramento, California victim losing almost \$1,000,000 (USD) he invested through Mack A. Obioha who was given \$500,000,000 (USD) towards a \$15,000,000 "construction loan" investment program that was to pay the victim \$650,000 (USD) in only 2-weeks.

The same Sacramento, California victim, after having lost \$500,000 (USD) with Mack Obioha, was approached by Roland Frank Beyer offering to assist the victim in recovering his previous loss if he invested another \$65,000 (USD) in another project. In total, the victim lost \$665,000 (USD) - almost \$1,000,000 (USD) million.

Things become real interesting, for:

- Jay Stevens (Los Angeles, California, USA); Mack Allman Obioha (Portland, Oregon, USA); and, Roland Beyer (Beverly Hills, California, USA).

It appears they got away with it because they all got arrested and released - one way or another - but that's not all. Within 2-weeks thereof (early September 1999), adding insult with even more injuries, Mack Obioha travels to California (USA) and then to Connecticut (USA) where he rips yet another victim, Ann DeAbate, for \$1,000,000 (USD) million dollars. Takes half of it - \$500,000 (USD) - and sends it to his previous Sacramento, California victim.

Matters did not fair so well for their remaining two (2) criminal co-defendants, Tam McNamara (Ohio, USA) and Ann Henderson (Texas, USA), a drag queen who posed as a former U.S. Secret Service agent, were sentenced.

Now as all this is going on - from mid 1999 all the way into mid 2000 - Mack Obioha is running his other firm as well as a 'publicly listed' firm named INTERNATIONAL CAPITAL PARTNERS LLC that he sells out his stock holding interest in for nearly \$4,000,000 (USD) million, and then Obioha disappears - no-doubt headed for his white sand beach.

Get this . . . No cops or feds are after Mack Allman Obioha (as of late 2007) ever though he was 'arrested and charged' with federal crimes, he mysteriously never got convicted, never got sentenced, and walked away with millions and was 54-years old when he did. No one knows 'how much' he walked-away with but if he can walk away in less than 1-month with \$1,000,000 (USD) million dollars 'net', imagine what he took down in total since he started - long before 1997.

How can characters like this get by with it? Where does their teflon come from? Many claim they are legitimate businessmen who are very good at what they do.

Anything ever happen to these guys?

Apparently activities like this being written about was somehow overlooked but it's nice to try and keep an eye on things from time to time to see if anything has changed.

In March 2008, a sizeable reward was offered just to locate Mack Allman Obioha. What's the use, I thought, if law enforcement lets 'em walk or claim no resources to perfect justice?

Sometimes I wonder 'how far' these characters are really allowed to continue walking, or whether they just eventually trip over the cord they're attached to.

At first, I recalled the case of Gabriel Francis MacEnroe but then quickly realized even that Swiss Irishman will be out of U.S. federal custody soon.

Some may live to see retirement while others may not be so lucky.

David, ever consider a book about fraudsters who appeared to have gotten away with it? What their lives turned out like?

- ShoreLines

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For a fast and meaningful recovery of stolen assets

Recovering a victim of financial fraud is easy. Tracking and securing stolen assets is not. Acting fast and targeted is an obvious necessity for hitting fraudsters where it hurts them most. Inside knowledge about local jurisdiction, regulations and proceedings will help you to succeed. "The FraudBait World Compendium" will show you how to successfully unravel and pierce legal structures in multiple jurisdictions and to get your

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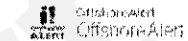
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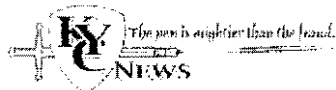
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Nevertheless, such forums can serve a useful purpose in the initial information gathering process when used responsibly.

Re: To all victims of Roland Bleyer

By Jaffer on 10/8/2006 11:40:23 AM
E-mail: jaffer10@hushmail.com

This is a "heads up" to beware of Roland Front BLEYER who hides behind several companies, one of which is Project Equity Services Group (PESG), whose address is Level 5, 44 Miller Street, North Sydney 2060 NSW, Australia and whose web site is www.projectequitygroup.com

The receptionist is Bleyer's niece.

Even though they appear to be a large and financially-strong company, there are only 3 people (Robert Charles POWER, Ian James BARDEN and Ian Charles ROBINSON) who comprise the companies which front for Bleyer.

The names of the other companies Bleyer hides behind are:

- Project Equity Nominees (PEN)
- Project Equity Trustees (PET)
- MM Securities Australia Pty. Ltd
- B&G Credit International (Singapore) Pte Ltd
- Rynwey Pty Limited
- Union Capital Pty
- Needlingrove Investments Pty Limited

These blokes are planning to have billions of dollars for project funding and to buy/sell Chinese cattle, Russian oil, Filipino gold, Nigerian refineries, etc.

After conducting due diligence on them over the past 60 days, I have concluded that these blokes have NO SUCH MONEY as they claim, and they have taken well over a million dollars from people as "advanced fees" for project funding, and have never performed as agreed.

I have names and coordinates of many of the victims, and I have the name and phone number of a Constable with the Queensland police who is aware of Mr. Bleyer's fraudulent schemes and the identities of some people who claim to be victims who have lost money to Bleyer and his band of thieves.

Here is a link to a web site that has been set up by a victim:

http://p101.ezboard.com/fbleyerscamprojectsfrm2

Here is info about Bleyer:

http://p101.ezboard.com/fbleyerscamprojectsfrm2.showmessage?topicID=5.topic

http://www.quations.com/Tax-Forums/viewtopic.php?t=1665133

Here is more info about PESG:

http://english.vietnamnet.vn/biz/2006/06/061285

I am continually seek information about Bleyer and/or his companies so if anyone has anything, let me know please.

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