

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. DIPLOMA, PRINCETON UNIVERSITY, Ph.D. IN MATHEMATICS, ISSUED TO ALANUM MATHISON TURING;
2. PHOTOGRAPH OF ALAN TURING IN COAT AND TIE, FACING RIGHT, BY ELLIOTT & FRY;
3. PHOTOGRAPH OF ALAN TURING IN COAT AND TIE, FACING LEFT, BY ELLIOTT & FRY;
4. ORDER OF THE BRITISH EMPIRE MEDAL, MINIATURE, AND INSTRUCTION SHEET CONTAINED IN BOX GILDED WITH O.B.E.;
5. LETTER FROM KING GEORGE VI PRESENTING O.B.E. TO ALAN M. TURING, ESQ.;
6. ALAN TURING'S HAZELHURST PREPATORY SCHOOL REPORT, DECEMBER 1924;
7. ALAN TURING'S SHERBORNE SCHOOL REPORT, FIRST-HALF SUMMER TERM 1926;
8. ALAN TURING'S SHERBORNE SCHOOL REPORT, SECOND-HALF SUMMER TERM 1926;
9. ALAN TURING'S SHERBORNE SCHOOL REPORT, FIRST-HALF MICHAELMAS TERM 1927;
10. ALAN TURING'S SHERBORNE SCHOOL REPORT, LENT TERM 1931;
11. ALAN TURING'S SHERBORNE SCHOOL REPORT, SUMMER TERM 1931;
12. PHOTOSTAT COPY OF PRÉCIS OF THE THEORY OF RELATIVITY BY ALBERT EINSTEIN PREPARED BY ALAN TURING FOR HIS MOTHER AT AGE FIFTEEN AND A HALF;
13. TAN POSTCARD, WITH CAPTION READING "THE UNIVERSAL ELECTRONIC COMPUTER INSTALLED AT MANCHESTER UNIVERSITY BY FERRANTI LIMITED, WHO ARE MANUFACTURING UNDER LICENCE FROM THE CORPORATION" WITH HANDWRITING "ALAN STANDING";
14. PHOTOGRAPH OF ALAN TURING, FACING RIGHT, VERSO READS "ALAN M. TURING 1936";
15. PHOTOGRAPH OF ALAN TURING, THREE-QUARTER PORTRAIT IN COAT AND TIE, FACING RIGHT;
16. PHOTOGRAPH OF ALAN TURING RUNNING; AND

17. PHOTOCOPY OF POSTCARD FROM ALAN TURING TO HIS MOTHER WITH BLUE INK NOTES,

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The United States of America, by and through United States Attorney Jason R. Dunn and Assistant United States Attorney Laura B. Hurd, pursuant to Supplemental Rules for Admiralty, Maritime and Asset Forfeiture Actions G(2), states:

JURISDICTION AND VENUE

1. The United States of America (the “United States”) has commenced this action pursuant to 19 U.S.C. § 1595a, 18 U.S.C. § 545, and 18 U.S.C. § 981(a)(1)(C), seeking forfeiture of defendant properties based upon violations of 18 U.S.C. §§ 1341, 1343, 2314, 2315, 542, and 545 and 19 U.S.C. § 1590.

2. This Court has jurisdiction under 28 U.S.C. §§ 1345 and 1355.

3. Venue is proper under 28 U.S.C. §§ 1355 and 1395 as the defendant properties are located and some of the acts described herein occurred in the District of Colorado.

DEFENDANT PROPERTY

4. Defendant property is more fully described as follows:

a. Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing (sometimes referred to herein as “defendant Princeton Ph.D. diploma”), more fully described as follows: Princeton University Diploma, Ph.D. in mathematics, issued to Alanum Mathison Turing on June 21, 1938, on vellum.

Defendant Princeton Ph.D. diploma was seized on February 16, 2018, from Ms. Julia Mathison Turing's residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

b. Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry (sometimes referred to herein as "defendant Photograph of Alan Turing in Coat and Tie, Facing Right"), more fully described as follows: a three-quarter portrait of Alan Turing in coat and tie, facing the right, measuring 6 ¼ by 4 ½ inches, in black and white bromide print on photographer's mount. Defendant Photograph of Alan Turing in Coat and Tie, Facing Right was seized on February 16, 2018, from Ms. Julia Mathison Turing's residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

c. Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry (sometimes referred to herein as "defendant Photograph of Alan Turing in Coat and Tie, Facing Left"), more fully described as follows: a three-quarter portrait of Alan Turing in coat and tie, with his body facing left and head facing the camera, in black and white bromide print on a photographer's mount. Defendant Photograph of Alan Turing in Coat and Tie, Facing Left was seized on February 16, 2018, from Ms. Julia Mathison Turing's residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

d. Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. (sometimes referred to herein as "defendant O.B.E. and Miniature"), more fully described as follows: Circa 1946, breast badge, "Officer of the Most Excellent Order of the British Empire" civil ribbon of gray and red,

Cross, King George V and Queen Mary Profile in center, “For God and the Empire” round, Miniature of the breast badge for formal wear, rectangular printed instruction card with handwritten “done” in blue ink, in rectangular case, labeled “O.B.E.” in the top, and “Royal Mint” in the inside. Defendant O.B.E. and Miniature was seized on February 16, 2018, from Ms. Julia Mathison Turing’s residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

e. Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. (sometimes referred to herein as “defendant Letter from King George VI”), more fully described as follows: Typed letter on Buckingham Palace Letterhead sending congratulations, with signature George R.I., with typed Alan M. Turing, Esq., O.B.E., located on lower right hand side. Defendant Letter from King George VI was seized on February 16, 2018, from Ms. Julia Mathison Turing’s residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

f. Alan Turing’s Hazelhurst Preparatory School Report, December 1924 (sometimes referred to herein as “defendant Hazelhurst School Report”), more fully described as follows: on yellow paper, filled by the hand of the teacher of each subject taken while Alan Turing was age 12. Defendant Hazelhurst School Report was seized on February 16, 2018, from Ms. Julia Mathison Turing’s residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

g. Alan Turing's Sherborne School Report, First Half Summer Term 1926 (sometimes referred to herein as "defendant Sherborne School Report, First-Half Summer Term"), more fully described as follows: on blue paper, filled by the hand of the teacher of each subject taken while Alan Turing was age 14. Defendant Sherborne School Report, First Half Summer Term 1926, was seized on February 16, 2018, from Ms. Julia Mathison Turing's residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

h. Alan Turing's Sherborne School Report, Second Half Summer Term 1926 (sometimes referred to herein as "defendant Sherborne School Report, Second Half Summer Term"), more fully described as follows: on blue paper, filled by the hand of the teacher of each subject taken while Alan Turing was age 15. Defendant Sherborne School Report, Second Half Summer Term 1926 was seized on February 16, 2018, from Ms. Julia Mathison Turing's residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

i. Alan Turing's Sherborne School Report, Michaelmas Term 1927 (sometimes referred to herein as "defendant Sherborne School Report, Michaelmas Term 1927"), more fully described as follows: on gray paper, filled by the hand of the teacher of each subject taken while Alan Turing was age 16. Defendant Sherborne School Report, Michaelmas Term 1927 was seized on February 16, 2018, from Ms. Julia Mathison Turing's residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

j. Alan Turing's Sherborne School Report, Lent Term 1931 (sometimes referred to herein as "defendant Sherborne School Report, Lent Term

1931”), more fully described as follows: on gray paper, filled by the hand of the teacher of each subject taken while Alan Turing was age 18. Defendant Sherborne School Report, Lent Term 1931 was seized on February 16, 2018, from Ms. Julia Mathison Turing’s residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

k. Alan Turing’s Sherborne School Report, Summer Term 1931 (sometimes referred to herein as “defendant Sherborne School Report, Summer Term 1931”), more fully described as follows: on gray paper, filled by the hand of the teacher of each subject taken while Alan Turing was age 19. Defendant Sherborne School Report, Summer Term 1931 was seized on February 16, 2018, from Ms. Julia Mathison Turing’s residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

l. Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half (sometimes referred to herein as “defendant Précis”), more fully described as follows: a 31 page Photostat Copy in a blue binder with two-hole binder clip of Alan Turing’s writings of Albert Einstein’s Theory of Relativity, made for Alan Turing’s mother, circa 1960. Alan Turing completed the defendant Précis at the age of fifteen and a half in 1927 and 1928. Defendant Précis was seized on February 16, 2018, from Ms. Julia Mathison Turing’s residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

m. Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, who are

manufacturing under licence from the corporation” with handwriting “Alan Standing” (sometimes referred to herein as “defendant Tan Postcard”), more fully described as follows: a postcard image of Alan Turing standing with two seated gentlemen, with a caption that reads, “The Universal Electronic Computer installed at Manchester University by Ferranti Limited, who are manufacturing under license from the Corporation”, with an additional caption reading “Alan Standing” in blue ink. Defendant Tan Postcard was seized on February 16, 2018, from Ms. Julia Mathison Turing’s residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

n. Photograph of Alan Turing, facing right, verso reads “Alan M. Turing 1936 (sometimes referred to herein as “defendant Photograph of Alan Turing, facing right, verso reads “Alan M. Turing 1936”), more fully described as follows: a three-quarter black and white portrait of Alan Turing, smiling, in coat and tie, facing the right, with a verso on the back that reads, “Alan M. Turing 1936”, in Mrs. Ethel Sara Turing’s handwriting. Defendant Photograph of Alan Turing, facing right, verso reads “Alan M. Turing 1936” was seized on February 16, 2018, from Ms. Julia Mathison Turing’s residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

o. Photograph of Alan Turing, three-quarter portrait in coat and tie, facing right (sometimes referred to herein as “defendant Photograph of Alan Turing, Three-Quarter Portrait”), more fully described as follows: a black and white three-quarter portrait of Alan Turing, at age sixteen, in coat and tie, facing the right. Defendant Photograph of Alan Turing, Three-Quarter Portrait was seized on February

16, 2018, from Ms. Julia Mathison Turing's residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

p. Photograph of Alan Turing Running, (sometimes referred to herein as "defendant Photograph of Alan Turing Running"), more fully described as follows: a black and white image of Alan Turing running. Defendant Photograph of Alan Turing Running was seized on February 16, 2018, from Ms. Julia Mathison Turing's residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

q. Photocopy of Postcard from Alan Turing to his mother with blue ink notes (sometimes referred to herein as "defendant Photocopy of Postcard"), more fully described as follows: a photocopy of post card from Alan Turing to his mother, while he was at Hazelhurst Preparatory School, dated November 5, 1924. Defendant Photocopy of Postcard was seized on February 16, 2018, from Ms. Julia Mathison Turing's residence in Conifer, Colorado, and is currently in the custody of Department of Homeland Security in Denver, Colorado.

INVESTIGATION

A. University of Colorado

5. In January 2018, the United States Department of Homeland Security ("HSI") received information that an individual had offered the University of Colorado, Boulder historical artifacts for display that were believed to be stolen.

6. A woman named Ms. Julia Mathison Turing ("Ms. Turing") had contacted the University of Colorado. Ms. Turing stated that she had items relating to Alan Mathison Turing ("Alan Turing"). Alan Turing was a British mathematician and pioneer

of theoretical computer science and artificial intelligence. Ms. Turing offered to loan the items to the University of Colorado for display.

7. As is customary at the University of Colorado when historical items are offered for display, a member of the University of Colorado researched the particular items being offered and discovered that they were likely stolen from the Sherborne School in Dorset, England, a school that Alan Turing attended as a youth.

8. Ms. Turing had represented herself as a relative of Alan Turing when she contacted the University of Colorado in 2018.

9. The Director of Special Collections, Archives and Preservation at the University of Colorado determined that Ms. Turing had not always gone by the name “Turing” and was unable to find any familial link between Ms. Turing and Alan Turing.

10. On approximately February 2, 1988, Ms. Turing legally changed her name from Julie Ann Schwinghamer to Julia Mathison Turing.

11. Ms. Turing is not a relative of Alan Turing.

12. The Director of Special Collections, Archives and Preservation at the University of Colorado was informed by the Sherborne School that a person identified as Julia Schinghomes¹ had visited the Sherborne School in 1984. During her visit, Ms. Schinghomes had stolen items related to Alan Turing from the school.

January 31, 2018 Meeting at University of Colorado

13. On January 31, 2018, members of the University of Colorado met with Ms. Turing in person to discuss displaying the Alan Turing items.

¹ Ms. Turing's name was Julie Ann Schwinghamer before it was legally changed. In correspondence with the Sherborne School Bursar, letters sent from Ms. Turing appear to be signed Julia Schinghomes. Ms. Turing admitted that her handwriting may have caused the confusion.

14. During the meeting, Ms. Turing expressed concern for the security of the items. She stated that she did not want her collection photographed.

15. Ms. Turing stated that she brought some of the original items and many reproductions, stating that she kept the originals at home to be safe, as it was too great a security risk to take them out.

16. Ms. Turing provided members of the University of Colorado with a reproduction of Alan Turing's Ph.D. diploma from Princeton University, which had the signatures removed and was covered with a protective film, which she stated would blur photographs if they were taken. She further stated she wanted to be able to track down whoever made unauthorized photos of the diploma.

17. Ms. Turing told members of the University of Colorado that she kept Alan Turing's Ph.D. diploma at home and stated that she had the original in a safe place.

18. Ms. Turing further showed University of Colorado representatives a graduation cap and gown Ms. Turing stated belonged to Alan Turing, explaining that it was an original, and pointing out the Princeton colors and math colors on the hood. In addition, she brought out a navy blue tie with white spots that Ms. Turing said belonged to Alan Turing and matched those items with a photo of Alan Turing wearing the items that she brought to the meeting.

19. Ms. Turing further showed members of the University of Colorado copies of letters from Alan Turing and said she had the original handwritten letters from Alan Turing at home beginning at age seven and continuing until later in his life.

20. Ms. Turing stated that she was working on a piece of art showing eight of Alan Turing's signatures over time, from childhood to graduate school. She stated that

she does original art with wax pencil on Arch paper, occasionally adding pastels and sells her art on the website eBay. She stated she wished to display her art, as well as the Alan Turing items, at the University of Colorado.

21. Ms. Turing then showed members of the University of Colorado a medal known as the Order of the British Empire (“O.B.E.”) that she said was Alan Turing’s O.B.E. The O.B.E. was in two boxes: an outer box which appeared to be faded army green, with a cardboard insert to protect the inner black box. The inner black box had gilt O.B.E. written on the outside of the box.

22. Inside the black box was a small card with instructions on how to wear the medals with various kinds of dress and what to do after the death of the owner. There was also a small note on the bottom written in blue ink. Ms. Turing said that Alan Turing’s mother had written the small note on the bottom.

23. The inner black box contained two medals, one was a larger gold-tone medal and the other was a smaller silver-toned medal.

24. In addition, a small letter approximately seven by five inches folded in half was in the box. The letter was from King George VI of Great Britain and was written on the King’s stationary. The letter is an apology for not presenting the award to Alan M. Turing, *Esq.*, in person.

25. Ms. Turing also showed the University of Colorado members photos, a poem she had written, and some pamphlets in Mylar sleeves that she said were original pamphlets containing Alan Turing’s running reports. She stated she did not bring them because they were too valuable.

26. According to Ms. Turing, Alan Turing became her father and she could always look to him for direction.

27. After the meeting, a University of Colorado member helped Ms. Turing carry the items to her car. Ms. Turing expressed concern that the University did not have a security guard at the library. In addition, Ms. Turing expressed her concern about how the University of Colorado would insure her pieces, and explained that the items were irreplaceable.

28. During the meeting, Ms. Turing never stated how she came into possession of the items. Ms. Turing also never mentioned Sherborne School.

B. Investigation of the Theft of Alan Turing Materials from the Sherborne School

29. Based on the information provided by the University of Colorado and the Sherborne School, HSI began an investigation into the theft of the Alan Turing items in Ms. Turing's possession that were taken from the Sherborne School in approximately 1984.

30. Sherborne School is an all-boys secondary boarding school, educating boys between the ages of 13 and 18, and is located in Dorset, England. Alan Turing attended Sherborne School from approximately 1926 to 1931.

31. According to open source information, Sherborne School is a boarding school overseen by a Board of Governors, as well as the Headmaster, who is responsible for the management of the school.

32. According to letters kept in the Sherborne School archives, Mrs. Ethel Sara Turing ("Mrs. Sara Turing"), Alan Turing's mother, wrote the Headmaster at

Sherborne School in approximately 1965 in order to set up a meeting to discuss items of Alan Turing's to be placed in the "Alan Turing Laboratories."

33. In one of the letters, Mrs. Sara Turing wrote, P.S. "Would you also, please let me know whether an enlargement of the frontispiece photo in Alan's biography would be a welcome addition? Or possibly the photo at the age of 16, opposite page 50, i.e. of a boy such as those working in the laboratory."

34. Mrs. Sara Turing also met with employees of Sherborne School to discuss the Alan Turing items that she was giving to the Sherborne School.

35. According to the Sherborne School Bursar, the core of the Alan Turing Archive held at Sherborne School was donated to the school between October 1965 and 1967 by Alan Turing's mother. At the same time, Alan Turing's mother also donated materials to King's College, now held at the King's College Archive Centre.

36. A representative of the Sherborne School provided HSI with a copy of a handwritten list provided to Sherborne School from Mrs. Sara Turing, which cataloged the items that she had given to the school from approximately 1965 to approximately 1967. (Attached as Exhibit A).

37. The list states "A.M. Turing" and "Contents of box" on the top.

38. The list included numerous items, including the following: Photostat copy of Précis of Einstein's Theory of Relativity prepared by Turing (aged 15 1/2) for his mother. Original in King's College, Cambridge Library; O.B.E. medal ([and] miniature) awarded for Secret War service 1939-1945 in Foreign Office; Princeton Ph.D. diploma 1937; Photo of Turing, aged 16 (in care it is required. Please return to Mrs. Turing, 6, Waterden Road, Guildford.); and some school reports.

39. The Alan Turing items in Sherborne School's possession were kept in a wooden box at the school.

40. The Sherborne School also provided HSI with information regarding the theft of items by an individual, who they believed was named Julia Schinghomes.

41. According to Sherborne School, in 1984 a woman by the name of Julia Schinghomes arrived at Sherborne School to look at the Alan Turing items in their possession that were given to the school by Alan Turing's mother.

42. Ms. Turing has admitted that she used the name Julie Ann Schwinghamer and the name Julia Schinghomes was likely due to her poor handwriting in letters to the Sherborne School Bursar.

43. Ms. Julia Schwinghamer contacted Sherborne School saying that she was visiting England and making a study of Alan Turing.

44. Ms. Julia Schwinghamer said that she had already visited the Universities of Manchester and Cambridge and would like to see the Alan Turing Archive held at the Sherborne School.

45. Colonel A.W. Gallon, who was the Sherborne School Bursar from 1981 to 1989, arranged for a member of the school staff to show her the Alan Turing items.

46. While unattended, Ms. Julia Schwinghamer stole items from the Alan Turing Archive held at Sherborne School.

47. Ms. Julia Schwinghamer returned to the United States with the stolen items from the Alan Turing archive in approximately 1984.

i. Letters in the Sherborne School Archives

48. After the theft of the Alan Turing items from Sherborne School, two similar, signed letters by Julia Shwingamer to A.W. Gallon were received and kept by Sherborne School in their archives.

49. One envelope has a postmark dated 1984 from Phoenix, Arizona, and was kept in the Sherborne School archive.

50. In both of the similar undated letters, Ms. Julia Schwingamer writes, "Please forgive me for what I did. I know what I did was wrong" She also writes, "I want you to know that it was very hard for me to steel [sic]. For I have never stolen before in my life and I did feel very badly for taking them." She also writes in both letters, "I had absolutely no intention of keeping them permanently."

51. In both letters, Ms. Julia Schwingamer writes that she had left a note attached to the bottom of the box where the Alan Turing items were stored.

52. On the bottom of the box containing the Alan Turing collection at Sherborne School, a note is attached stating the following: "Please forgive me for taking these materials into my possession. They will be well taken care of while under the care of my hands and shall one day all be returned to this spot."

53. In addition, in both letters, Ms. Julia Schwingamer writes that she is returning all the items she took, except for a photograph of Alan Turing.

54. According to a memorandum drafted by Colonel A.W. Gallon after he left the school and kept in the Sherborne School archives recollecting the events surrounding the theft of Alan Turing items, he wrote:

I joined Sherborne in 1981 and had my first hip operation in 1985. It was not as early as 1982, so must have been in the summer holiday of 1983 or 84, and I can't improve on that; unless the current Bursar kept a

file on which were the letters the guilty lady wrote to me, and those I wrote.

My secretary Doreen Beaton told me there was an American lady who wanted to see the Alan Turing 'collection'. I asked her in and she told me [she] was making a study of him. She had already been to Manchester and Cambridge Universities. I am familiar with the eccentricities of Americans but I got the impression that she has a 'crush' on Turing.

One of my staff took her over to the Librarian (Tony?) who gave her access to Turing's bits n pieces.

I did not see her again but she wrote expressing her joy at having a collection of Turing items, and included photo of them laid out on a table – his photo, OBE & so on. I was not aware that she had taken them, nor indeed was the librarian! I asked him to make a list of the missing items but it proved to be incomplete because we had no inventory anyway.

I phoned Manchester and Cambridge. They confirmed the visit of a strange American lady who gave a different surname to the one she gave me. Her first name was Julia, her second unpronounceable. They watched her closely and she took nothing. I wrote back to her and after a couple of weeks wrote to the Head of Police at Phoenix, Arizona, where she came from.

I gave up any hope of ever getting A.T.'s things back 'til one day she wrote saying she was sending them back. A parcel arrived. It contained more than the Librarian had listed which made me cross.

I wrote thanking her and she told me she intended to join the U.S. Army and was training hard for the U.S. Olympic team (track). I wished her luck and heard no more.

55. In another letter from Ms. Julia Schwinghamer to A.W. Gallon, kept in the Sherborne School archives, she writes, in part, the following:

I am very glad Alan's things arrived safely, for the safe arrival of his things filled my mind with much worry. I am very very grateful [sic] of your generosity in allowing me to keep the photo of Alan, the picture has taken an even greater meaning since it was given to me by Sherborne. Someday I will come back to return the photo to the proper place from which I took it, in the mean time it will be very well taken care of.

56. According to Sherborne School, the following original items donated by Mrs. Sara Turing were not returned to the Alan Turing archive at Sherborne School: defendant Princeton Ph.D. diploma; defendants Photograph of Alan Turing in Coat and Tie, Facing Right, by Elliott & Fry and Photograph of Alan Turing in Coat and Tie,

Facing Left, by Elliott & Fry; defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E.; defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq.; defendant Hazelhurst School Report; defendant Sherborne School Report, First-Half Summer Term; defendant Sherborne School Report, Second Half Summer Term; defendant Sherborne School Report, Michaelmas Term 1927; defendant Sherborne School Report, Lent Term 1931; defendant Sherborne School Report, Summer Term 1931; defendant Sherborne School Report, Summer Term 1931; defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E.; defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq.; defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half.

57. Several additional letters and records were kept in the archives at Sherborne School related to the theft in 1984. The following is a summary of some of the items and their content:

- a. An undated note written by Mr. John Robert Lloyd, a biology teacher at Sherborne School, to Mr. Duncan Barker for the Archives, stating, "(This Girl stole various pictures etc of Alan Turing when she visited Sherborne). I showed her round!!"
- b. A June 22, 1984 memorandum from Cambridge University to the Sherborne School librarian concerning Julia Schwinghamer and stating that she had visited King's College, Cambridge, using the name Katheryn Turner, where she was told she must make an appointment and produce identification, but she

did not return. A note on the memorandum states, “This is referring to the theft of some material from the Turing Archive which was subsequently returned by the woman concerned.”

C. Morro Bay Police Department

58. In approximately 1988, Ms. Julia Turing's mother, Ms. Virginia McKenzie, received a telephone call from Sherborne School. During the conversation, Sherborne School informed Ms. Virginia McKenzie that they wanted the Alan Turing items back that were taken from the school by Ms. Turing.

59. A relative of Ms. Turing, took items, including Alan Turing's Ph.D. from Princeton University and photos of Alan Turing to the Morro Bay Police Department.

60. The Morro Bay Police Department sent two color polaroid photographs to Sherborne School of items in Morro Bay Police Department's possession that were taken from Sherborne School by Ms. Turing. One polaroid photograph depicts defendant Alan Turing's Princeton Ph.D. and the other polaroid photograph depicts defendants Photograph of Alan Turing in Coat and Tie, Facing Right, by Elliott & Fry and Photograph of Alan Turing in Coat and Tie, Facing Left, by Elliott & Fry.

61. After the Morro Bay Police Department received the items, Ms. Turing wrote the following letter to A.W. Gallon. The letter is written on United States Army stationary and is signed Julia M. Turing. In it, she writes, in part, the following:

At this point in which I write this letter, I am extremely worried about the fate of Alan's Ph.D. After I got off the phone from talking to you I called Morro Bay Police to find out what they did to Alan's diploma. Sgt. Buer [sic] has given me several stories and has not been cooperative in giving me the information I need to place a trace on it in the event it may have been lost in the mail. The police have been rather nasty about the whole situation, saying it is out of their hands and don't care if it makes it's destination or not. They said it was not insured nor packed very well. I am

extremely [sic] concerned for it's safety and whereabouts. I therefore have contacted a Congressman in Washington D.C. to force the police to be cooperative in providing the information as to the where Alan's Ph.D could be. I have spent all day long making calls all over the nation to get help to recover his diploma. At this point I will do everything in my power to find Alan's diploma, it means everything to me, I place my very life on it. Though the police were very careless with it and have lied to me several time [sic] about what has happened to it, I consider myself ultimately responsible for the well being of Alan's diploma, and as I have written in my diary I will take my life if Alan's Ph.D cannot be returned. I have protected it with my life in the past, I have given up much for it's safety and I will do so again if necessary. I would like to express how very grateful [sic] to you I am for your extreme generosity, you are truly [sic] a man of humanity and kind understanding. I only hope I will get it back into my hands again.

62. In another letter dated September 15, 1988, Ms. Turing wrote a letter to A.W. Gallon. In it she states, in part:

But now that I have lost Alan's Ph.D I feel as though I have lost my soul, ruthlessly taken away by my own family with the intention of destroying my life. His Ph.D was the only actual belonging of Alan I had, it meant so very much to me that I can't explain in words how much it meant to me. Since talking to you on the Phone, you had told me there wasn't any problem that you would allow the police to return Alan back to me where he has always been well taken care of. I made a promise to you that I would come back to England to return anything I took and add to Alan's collection anything I had to the collection you have. I had hoped you would be more understanding of my tremendous love and devotion for Alan Turing.

Everyone including the police wished they could give it back to me, they told me they called you again to see if there was some way you could allow Alan's Ph.D to remain with me. They could see the pain and torment I was in when I learned that you wanted it sent back.

63. In addition, later in the letter dated September 15, 1988, Ms. Turing writes, in part:

Now that I have lost Alan I just hope and pray that his Ph.D. arrives safely. I am terribly worried about it getting damaged or lost. Please write to me, let me know if it made it safely to you. Will you ever allow me to see it again? Please take very good care of it. I hope it will be placed in a very safe and secure place. For myself I am going into the Army as an officer, then I will be working for the government under secret classification. I

have cut off my family forever I will never have anything to do with them ever again. I have forgiven them so many times in the past but the loss of Alan's Ph.D. has been too much pain for me to bear. I'm very thankful that you allowed the photographs to remain with me, losing [sic] them as well would have been too much for me to handle. I know that Alan would want me to have his Ph.D. he knows how very important it is to me and if he was still alive it would make him very happy to give it to me because he would know how very special he is to me. He would know he wasn't giving it away to just anyone, but to someone who cares about him deeply. I am sure that Alan is as sorrowful as I am over my terrible loss of his Ph.D. If there was only some way you could understand just how much Alan means to me. I believe maybe you would allow Alan's Ph.D. to remain with me until I would eventually return it as I had promised, because you have shown me your generosity to me before.

D. February 16, 2018 Search Warrant

64. On February 16, 2018, a federal search warrant was executed at Ms. Turing's home.

i. Interview of Ms. Turing

65. While the search was being conducted, Ms. Turing spoke with law enforcement agents.

66. During the conversation, Ms. Turing admitted that she had two other names that she used, Julia Elliot and Julia Schwinghamer.

67. During the conversation, Ms. Turing stated that she visited the Sherborne School in 1984.

68. Ms. Turing said that she visited Sherborne School with the intent of talking to Mr. A.W. Gallon who she stated was in charge of the school. She said she wanted to talk about the items the school had regarding Alan Turing.

69. Ms. Turing stated while at Sherborne School she was given Alan Turing's Ph.D. diploma and she said she had a letter proving her claim. She stated she was

unable to remember where the letter was or where the Ph.D. diploma was. She denied that the documents were at her house.

70. Ms. Turing further stated the Ph.D. was far away, and initially denied having any other items belonging to Alan Turing.

71. Ms. Turing told the HSI agents that the “Ph.D. was given to me” and “they belong to me they weren’t stolen, they were stolen from me by my family members and some photos that I’ve had all my life.”

72. Ms. Turing also said that she had an Order of the British Empire Medal that she bought off Craigslist adding, “I don’t have Alan Turing’s O.B.E.”

73. She recalled that the last time she wrote to Sherborne School was in 1987, then Ms. Turing joined the U.S. Army and was sent to Germany where she was stationed.

74. When asked about the name “Julia Schinghomes,” a signature which appeared to be on some of the letters to Mr. A.W. Gallon, Ms. Turing stated that it was her bad handwriting.

75. Ms. Turing said that she had letters from Mr. A.W. Gallon apologizing to her when Alan Turing’s Ph.D. diploma was taken away from her.

76. Ms. Turing also stated that some original photographs and Alan Turing’s Ph.D. were given to her at Sherborne School. When asked how Ms. Turing was given Alan Turing’s Ph.D., she said the items were given to her in 1984 in a private ceremony when she visited the school by an older unidentified gentleman at the school.

77. Ms. Turing stated that “I asked if I may be able to look at them, I told them how important Alan was to me” adding, “I saw his O.B.E. and photostat copies of his letters” and “I was allowed to keep the Ph.D.”

78. Regarding the photographs Ms. Turing stated were given to her, she stated, “I had them copyrighted so they belong to me.”

79. Ms. Turing denied having Alan Turing’s O.B.E. or other items belonging to him that were at Sherborne School.

80. Ms. Turing said she bought an O.B.E. off ebay because she wanted a “display of things that looked real close, with the understanding they were not his.”

ii. Items Recovered during the Search

81. During the search of Ms. Turing’s residence, law enforcement officers located several black boxes that contained at least one Order of the British Empire medal. These items were in the dresser drawer in Ms. Turing’s bedroom.

82. Law enforcement officers also located a plastic bucket with several black leather cases containing Commander of the British Empire Medals and military O.B.E.s.

83. In addition, copies of Alan Turing photographs, copies of Alan Turing’s school reports, and diaries written by Ms. Turing were also found throughout the residence.

Defendant Diploma, Princeton University, Ph.D. in Mathematics, issued to Alanum Mathison Turing

84. In Ms. Turing’s bedroom, law enforcement officers located defendant Diploma, Princeton University, Ph.D in Mathematics, issued to Alanum Mathison Turing behind a dresser.

Defendants Photograph of Alan Turing in Coat and Tie, Facing Right, by Elliott & Fry and Photograph of Alan Turing in Coat and Tie, Facing Left, by Elliott & Fry

85. Law enforcement officers also located defendants Photograph of Alan Turing in Coat and Tie, Facing Right, by Elliott & Fry and Photograph of Alan Turing in Coat and Tie, Facing Left, by Elliott & Fry.

86. Defendants Photograph of Alan Turing in Coat and Tie, Facing Right, by Elliott & Fry and Photograph of Alan Turing in Coat and Tie, Facing Left, by Elliott & Fry were depicted in the polaroid photographs sent by Morro Bay Police Department to Sherborne School in the 1980s.

87. During the search of the residence, law enforcement officers were unable to locate some of the items listed on the search warrant.

88. One of the law enforcement agents asked Ms. Turing if she would help locate the items listed on the warrant. She agreed, and began looking through a box, but appeared to be distracted. She appeared to be looking toward the bathroom located on the ground floor. When it became apparent that she would not tell law enforcement officers where the items on the search warrant were located, she was escorted outside.

89. Based on what law enforcement agents observed of Ms. Turing's behavior, a second search of the ground floor bathroom was conducted. During the second search of the ground floor bathroom, agents discovered a portion of the wall that was removable.

90. After removing that portion of the wall, a space under the stairs was found. In the space under the stairs, an old leather briefcase was found. Next to the briefcase,

several compact discs marked “Alan Turing photographs” and black bound diaries were located.

91. Inside the briefcase hidden behind the wall, items belonging to Sherborne School were found.

Defendants Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E and Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq.

92. Defendant Order of the British Empire Medal, Miniature, and Instruction Sheet was located in the briefcase. The defendant Order of the British Medal and Miniature were contained in a black box with gilded O.B.E. on the top.

93. Inside the black box containing the defendant O.B.E. and miniature was an instruction sheet titled, “THE MOST EXCELLENT ORDER OF THE BRITISH EMPIRE.” Under the title it states, “Instructions as to wearing Insignia.” In the lower right corner, in blue ink, which appears to be in Mrs. Sara Turing’s handwriting the word “done.” is written after the last line of the instructions reading, “The Insignia are not returnable on death, but are retained by the relatives of the deceased, who should notify the Registrar, Central Chancery of the Orders of Knighthood, St. James’s Palace, London, S.W. 1, of the date of decease.”

94. The defendant O.B.E. and miniature both stated “FOR GOD AND THE EMPIRE” on the medals.

95. In addition, an envelope was found with defendant O.B.E. and miniature containing defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. In the center of the outside of the envelop is written:

Alan M. Turing
O.B.E.

(Letter from King George)

96. On the bottom right-hand side of the envelope is written “property of: J.M. Turing.”

97. Inside of the envelope is a typewritten note on Buckingham Place letterhead stating the following:

I greatly regret that I am unable to give you personally the award which you have so well earned.

I now send it to you with my congratulations and my best wishes for your future happiness.

98. The letter has a signature of King George VI, specifically, “George R.I.”

99. The R.I. stands for Rex Imperator or King-Emperor.

100. Below the signature of King George VI, “Alan M. Turing, Esq., O.B.E.” is typewritten on the bottom of the letter.

Defendants School Reports

101. In addition, law enforcement agents discovered original Alan Turing school reports in the briefcase.

102. The school reports were identified as defendants Alan Turing’s Hazelhurst Preparatory School Report, December 24; Alan Turing’s Sherborne School Report, First-Half Summer Term 1926; Alan Turing’s Sherborne School Report, Second-Half Summer Term 1926; Alan Turing’s Sherborne School Report, First-Half Michaelmas Term 1927; Alan Turing’s Sherborne School Report, Lent Term 1931; and Alan Turing’s Sherborne School Report, Summer Term 1931.

Defendant Photostat Copy of Précis of The Theory of Relativity by Albert Einstein prepared by Alan Turing for his Mother at age fifteen and a half

103. Law enforcement agents also discovered the defendant Photostat copy of Précis of The Theory of Relativity by Albert Einstein prepared by Alan Turing for his Mother at age fifteen and a half (“defendant Photostat Copy of Précis”) in the briefcase.

104. The defendant Photostat Copy of Précis was bound in a blue cover. A white page in Mrs. Sara Turing’s handwriting is affixed to the front cover, stating the following:

Photostat copy of The Précis of ‘The Theory of Relativity’ by Albert Einstein made for his mother by Alan M. Turing at the age of fifteen and a half.

105. The defendant Photostat Copy of Précis is bound with a silver clip. The silver clip is engraved with “Twinlock-No828cm-ENGLAND.”

Defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, who are Manufacturing under Licence from the Corporation” with Handwriting, “Alan Standing”

106. Law enforcement officers also discovered defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, who are Manufacturing under Licence from the Corporation” with Handwriting, “Alan Standing” (“defendant Tan Postcard”) in the briefcase.

107. On the front of the postcard, “Alan Standing” is written. The handwriting appears to be Mrs. Sara Turing’s handwriting.

108. On the back of defendant Tan Postcard, in blue handwriting appearing to be that of Mrs. Sara Turing is written, “Please return to Mrs. Sara Turing G. WATERDEN ROAD GUILDFORD Surrey England.”

109. The first words “Please return to Mrs. Sara Turing” are struck-through in black ink.

Defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936”

110. Law enforcement agents recovered defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” in the briefcase.

111. The handwriting on the back stating “Alan M. Turing 1936” is in blue ink and appears to be the handwriting of Mrs. Sara Turing.

Defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right

112. Law enforcement agents recovered defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right (“defendant Photograph of Alan Turing, Three Quarter Portrait”) in the briefcase.

113. On the center back of defendant Photograph of Alan Turing, Three Quarter Portrait, “ALAN TURING Aged 16 Graduating class of 1931 from Sherborne School.” is written in Ms. Turing’s handwriting.

114. On the bottom left corner of defendant Photograph of Alan Turing, Three Quarter Portrait, “Kindly given to me by the Bursar of Sherborne School England.” is written in Ms. Turing’s handwriting. Under the notation, it is signed by Julia Schwinghamer.

Defendant Photograph of Alan Turing Running

115. Law enforcement agents recovered defendant Photograph of Alan Turing running in the briefcase.

Defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes

116. Law enforcement officers also recovered defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes (“defendant Photocopy of Postcard”).

117. On top of defendant Photocopy of Postcard, in blue ink, is written the following: “Copy of Postcard from Alan M. Turing. Hazelhurst Frank Sussex” with a date. The blue writing appears to be Mrs. Sara Turing’s handwriting.

118. The writing on the postcard by Alan Turing is in black ink.

119. After the defendant items were seized during the search of Ms. Turing’s home, law enforcement agents took the briefcase outside where Ms. Turing was standing and showed her the briefcase.

120. When asked if there was anything else, Ms. Turing stated, “you got it all” and looked down toward the ground.

iii. Letters and Diaries

121. After the search of Ms. Turing’s home, Ms. Turing provided law enforcement letters from 1984.

122. In a letter dated, August 7, 1984, it states the following:

Dear Miss Schwinghamer,

I do hope that I have your name right. We had all deduced that it was Kathryn Turner. Thank you for writing. If the Turing memorabilia arrived safely then all will be forgotten as far as we are concerned. I think I can understand how you have felt and what motivated you is an action out of character with your normal self. Thank you for phoning. It was such a great relief for us when you chose to respond, and I repeat my invitation to come and continue and research in the future.

With best wishes,

Yours sincerely Tony Gallon

PS And now famous alumni is Jeremy Irons. Now acting on Broadway!”

123. In a letter dated, August 20, 1984, it states the following:

Dear Miss Schwinghamer,

You will be pleased to know that the parcel arrived safely and I am grateful to you for what is a very [] gesture and one of which Alan Turing [] would be proud. I am sorry that you have retained the one photograph. Particularly as there was a negative among the collection from which you could have had another one done. I have now [] here, and because of your action, you may keep the photograph. I have told the police here that you have returned all but the photograph and that as far as we are concerned, the matter is closed. I hope that they will pass this on to the police there, but you will have this letter to show them in case you are questioned. Thank you for your photography of your sculpture which I will show to the Headmaster when he returns – everyone is on holiday at present.

Yours Sincerely, Tony Gallon

124. During the search, law enforcement officers located three photocopied letters enclosed in a paper pouch taped to the back of the frame holding Alan Turing's Ph.D. from Princeton University found in Ms. Turing's bedroom.

125. The first letter is a hand-written letter dated 19 November, but does not indicate the year. The letterhead states "The Bursar Sherborne School Abbey Road, Sherborne Dorset, DT 9 3LF." The contents of the letter are as follows:

Dear Miss Turing:

Thank you for your long letter and the press cuttings. I have written to Sgt. Beuer of the Morro Bay Police saying that you may keep the diploma. If I am too late and it arrives here, I will sent it back to you.

Good luck with the Olympic selection. We shall be looking out for you in 1992.

Your [illegible]

Tony Gal [illegible]

126. The second letter recovered, is a typewritten letter, dated January 11, 1989. The letterhead states, "The Bursar Sherborne School Abbey Road, Sherborne Dorset, DT9 3LF" The contents of the letter are as follows:

SC/126/AWG/DB

11 January 1989
Lt Julia M Turing
A Co 84 CML
Ft McClellan LA 36205
USA

Dear Miss Turing

Thank you for your letter. You will be pleased to hear that the parcel containing the diploma arrived here (by sea-mail) just after Christmas, and I sent it straight back to you, again by sea-mail. It obviously took several weeks to get here so you might not receive it until February or March.

You probably do not know that there was recently a play in London about Alan Turing called "Breaking the Code" and that this is to be made into a film in the near future.

With best wishes for your military career. I served in the British Army for 31 years, retiring as what you call a "bird-Colonel."

Yours sincerely
[illegible signature]

A W Gallon
Bursar

127. A third letter recovered is a typewritten letter dated January 4, 1988, and addressed to the Mayor of Morro Bay. The letter states the following:

January 4, 1988

Staff Judge Advocate
(Legal Assistance)

Mayor
City Hall
City of Morro Bay
Morro Bay, California 93442

Re: Lieutenant Julia M. Turing

Dear Sir:

On January 3, 1988, Second Lieutenant Julia M. Turing came to our office concerning a problem she is having with the City of Morro Bay Police Department. She stated that in late August of 1988, her sister, Carol Elliot, broke into her home and stole

several items. Lieutenant Turing contacted the Morro Bay Police Department for assistance when her sister demanded money in exchange for the items. Sergeant Beur, from the Morro Bay Police, worked on her case. He was able to have the sister return some of the items, but not all of them. One particular item, a framed diploma from Sherborne School in Great Britain, was held by the police because the ownership of it was disputed by the parties. The school has now confirmed in writing to the police that the diploma belongs to Lieutenant Turing. Lieutenant Turing attempted to contact Sergeant Beur to find out the current whereabouts of the diploma in order that it can be sent to her. When questioned, Sergeant Beur has been unwilling to tell her any details of the location of the diploma or if, when, where or how the diploma was mailed. He has refused to provide any documentation to her.

Due to the police's lack of cooperation, I am requesting your assistance in this matter. As you are aware, a governmental agency has a duty to safeguard any items it assumes responsibility for, especially potential evidence in a criminal case. Please advise me as soon as possible on the exact whereabouts of the diploma. If it is [sic] has been sent, please provide me with when and where it was shipped, who is the carrier and the invoice number so that it can be traced.

Your assistance in this matter is greatly appreciated. I may be reached at (205) 848-5334/3414 or at the address above.

Sincerely,

Edward M. Williams, Jr.
Captain, U.S. Army
Legal Assistance Officer

Copy Furnished:
Lieutenant Julia M. Turing

128. Based on the letter purportedly from Edward M. Williams, Jr., Captain U.S. Army, the U.S. Army Criminal Investigation Division was contacted by HSI.

129. The U.S. Army Criminal Investigation Division could find no record of a Captain or officer by the name of Edward M. Williams, Jr.

130. In addition, based on the content of the letter, the U.S. Army Criminal Investigation Division further indicated that they have never known a U.S. Department of Defense ("DoD") legal assistance attorney to overstep their bounds in such a manner. According to U.S. Army Criminal Investigation Division, the legal assistance attorneys have a very limited scope of duties while in that position. Further, they also indicated

that if the DoD were to be involved it should have been one of the criminal investigative units of the DoD and the U.S. Army Criminal Investigation Division reporting system did not reflect it.

131. A Post Office of Great Britain Customs Declaration was also found enclosed in a paper pouch taped to the back of the frame holding Alan Turing's Ph.D. The Declaration says the country of origin of the goods is Britain and the detailed description of the contents states "Documents & Photographs." The value is listed as 30 British Pounds. There is no listed UK export license.

Review of Ms. Turing's Diary Entries

132. Law enforcement agents reviewed Ms. Turing's diaries seized during the search of her residence on February 16, 2018.

133. In several diary entries, Ms. Turing mentions that she has had the Ph.D. and photographs from 1986 to 2014.

134. On April 10, 1987, Ms. Turing writes that she wishes she would not have to hide Alan Turing's things. She further writes that the items are beyond priceless.

135. On September 13, 1988, Ms. Turing writes, "I went to the police station . . . he told me I could have my photographs but he kept coming back to say he couldn't get to them....I found out this morning they want it back."

136. On February 1, 1990, Ms. Turing writes that she plans to return all of Alan Turing things safely to the archives.

137. On July 28, 2012, Ms. Turing writes the following addressed to Alan Turing, "A museum could find out and claim they are stolen and try to force me to give your things to them."

138. On June 23, 2013, she writes about holding Alan Turing's O.B.E. and Ph.D.

139. In various entries in 2012 and 2013, Ms. Turing states she is concerned that police will come to take away Alan Turing's Ph.D., O.B.E. and photographs.

140. In an entry from 2014, Ms. Turing writes about having Alan's Ph.D., O.B.E., and photographs, amongst other items.

141. In a 2014 entry, Ms. Turing mentions carrying Alan Turing's O.B.E. in her pocket to keep it close.

142. In another entry on May 20, 2014, Ms. Turing writes that she has had Alan Turing's Ph.D., O.B.E. and photographs for 32 years and some photos for 44 years.

E. INTERVIEWS AND CORRESPONDENCE

Dr. Andrew P. Hodges, PhD

143. As part of the investigation, Andrew P. Hodges, Ph.D. ("Dr. Hodges") was contacted. Dr. Hodges is a Professor Emeritus in Mathematics at Wadham College, Oxford University and an author. Amongst other publications, Dr. Hodges is the author of *Alan Turing: The Enigma*, first published in 1983.

144. In January 1978, Dr. Hodges wrote to Mr. A.D. Childs, the Sherborne School librarian at that time, requesting copies of Alan Turing's Sherborne School reports that were given to the School by Alan Turing's mother.

145. In response on February 27, 1978, Mr. A.D. Childs wrote back to Dr. Hodges, stating that the main contents of the box that contained Alan Turing's materials included: medals (OBE and School Mathematics gold medal); Certificates (School Certificates, Cambridge B.A., etc.); Offprints of Turing's published writings; a large file of

Turing letters from 1923 onwards (all photocopies); and Sherborne School reports, for the years 1926-1931 (18 in all, together with 1 report from Hazelhurst). In addition, Mr. A.D. Childs wrote that the reports are on blue paper and in some cases written in blue ink, and the school's Xerox copier may be unsuccessful in reproducing them.

146. Dr. Hodges recalled that while researching his book, he saw Alan Turing's O.B.E. at Sherborne School. According to Dr. Hodges, the medal had a small typescript letter sent on behalf of King George VI, stating that the King was ill and would not be presenting the medal.

147. Dr. Hodges was sent six photographs taken of the O.B.E. medal, miniature, and letter from King George VI seized from Ms. Turing's home. After reviewing the photographs, he stated that the photographs were consistent with what he recalled seeing at Sherborne School. In addition, he stated that he recalled the inscription "for God and Empire" on the O.B.E. He also stated that the letter from King George VI was not exactly as he thought he recalled, because he did not remember it being personally signed by the King.

Mr. John Robert Lloyd

148. Mr. John Robert Lloyd ("Mr. Lloyd") was a former biology teacher at the Sherborne School. Mr. Lloyd was at the school when the materials related to Alan Turing were given to Sherborne School by Mrs. Sara Turing. Mr. Lloyd was also at the Sherborne School in 1984 when Alan Turing's items were stolen from the school.

149. According to Mr. Lloyd, he had dinner with Mrs. Sara Turing and Mr. Shor, who was Alan Turing's physics teacher. During the dinner, they discussed Alan Turing's items that Mrs. Sara Turing intended to gift to Sherborne School.

150. Mr. Lloyd recalled that Alan Turing's memorabilia was kept in a wooden box and kept in the Biology Lab for many years.

151. According to Mr. Lloyd, he saw Alan Turing's medals, school reports, and photographs, including photographs taken when Alan Turing became a member of the Royal Society as well as a photograph of him at age 16. In addition, he also recalled the letter from Alan Turing's mother that lists all the items given to the Sherborne School.

152. Mr. Lloyd recalled that in 1984, a young American woman visited Sherborne School. Mr. Lloyd described the woman as early 20s with long hair. She spoke to Mr. Lloyd and stated that she would like to see the Turing archive.

153. At that time, the box was located in the biology lab. Mr. Lloyd showed her around the Biology Laboratory.

154. Mr. Lloyd found out that items were missing and felt "duped" by the young woman who he was attempting to help.

155. Mr. Lloyd stated that currently many of the school reports are missing. According to Mr. Lloyd prior to Ms. Turing's theft, the school had many of the school reports and now only a few remain at the school.

Sir John Dermot Turing

156. Sir John Dermot Turing is the nephew of Alan Turing. Sir John Dermot Turing attended Sherborne School until he was 17 years old.

157. According to Sir John Dermot Turing, Alan Turing's own role in the war effort was not known before 1982 and until the publications of Dr. Andrew Hodges's and Gordon Welchman's books.

158. Sir John Dermot Turing recalled the O.B.E. medal and the Sherborne school reports. He stated that he recalled the school reports being blue in color.

Mr. Gregg B. Beuer

159. On January 30, 2018 and August 17, 2018, HSI spoke with Mr. Gregg B. Beuer, formerly a Sergeant with the Morro Bay Police Department in California.

160. Mr. Beuer was involved in the 1988 case involving Alan Turing items turned over to them that were in possession of Ms. Turing.

161. Mr. Beuer recalled Ms. Turing and stated that Ms. Turing told him that she was related to Alan Turing.

162. Mr. Beuer was asked about any complaints he received from the U.S. Army or Mayor of Morro Bay. Mr. Beuer stated he did not remember any such complaint and stated that it would be something he would remember.

163. Mr. Beuer was also asked if he received any letter from the Bursar at Sherborne School. Mr. Beuer stated he did not receive any correspondence from the Bursar at Sherborne School, but he did speak directly with the Headmaster at Sherborne School who did not confirm that Ms. Turing could have the Ph.D. diploma.

F. Sherborne School Authority and Valuation

164. Sherborne School indicates that they believe Ms. Turing returned some items to the school, but also returned items that were not originals, including a tarnished O.B.E. medal, which was not in the original box, did not include a miniature, and did not include King George VI's letter.

165. The theft or taking of all defendant assets from Sherborne School without authority is a violation of the United Kingdom's Theft Act of 1968.

166. Based on the information obtained in the investigation, law enforcement agents contacted Sherborne School regarding the authority of a Bursar to give away or gift school property.

167. According to Sherborne School, no Bursar would have the sole authority to gift or otherwise dispose of items or property of Sherborne School.

168. Sherborne School stated that the Board of Governors would have that authority. A review of all of the Board of Governors meetings was conducted by Sherborne School between 1984 and 1989 and there was no meeting in which Alan Turing's items were mentioned or any authority given to A.W. Gallon to gift or dispose of Alan Turing's items.

169. The Sherborne School has requested the return of all of defendant assets.

170. According to Sherborne School, the defendant properties are of significant historical value to their institution and they would not have sold any of the defendant assets for any price.

G. Valuation

171. The fair market value of defendant properties is approximately \$37,775.00.

172. Based in information provided to HSI, Alan Turing manuscript items are very scarce in the auction marketplace. An autographed letter signed by Alan Turing sold for \$136,122.00 in February 2016. A wartime manuscript of mathematical notes by Alan Turing sold for \$1,025,000.00 in April 2015.

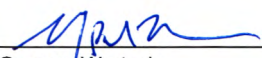
CONCLUSION

173. Based on the investigation, there is reason to believe that all defendant properties were stolen, smuggled, or clandestinely imported into the United States

contrary to law. In addition, there is reason to believe that defendant properties are proceeds obtained as a result of a scheme to defraud Sherborne School.

VERIFICATION OF GREGORY WERTSCH
SPECIAL AGENT, U.S. DEPARTMENT OF HOMELAND SECURITY

I, Special Agent Gregory Wertsch, hereby state and aver under the pains and penalties of perjury that I have read the foregoing Factual Basis for Forfeiture and that the facts and information contained therein are true.

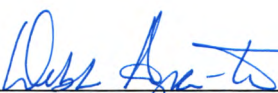


Gregory Wertsch
Special Agent
U.S. Department of Homeland Security

STATE OF COLORADO)
) ss
COUNTY OF DENVER)

The foregoing was acknowledged before me this 17th day of January, 2020 by Gregory Wertsch, Special Agent, U.S. Department of Homeland Security.





Notary Public - Colorado
My Commission Expires: 7/11/20

FIRST CLAIM FOR RELIEF

174. The Plaintiff repeats and incorporates by reference the paragraphs above.

175. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced, into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SECOND CLAIM FOR RELIEF

176. The Plaintiff repeats and incorporates by reference the paragraphs above.

177. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced, into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

THIRD CLAIM FOR RELIEF

178. The Plaintiff repeats and incorporates by reference the paragraphs above.

179. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced, into the United States contrary to law, to wit 19 U.S.C. § 542. Therefore, defendant Diploma, Princeton

University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

FOURTH CLAIM FOR RELIEF

180. The Plaintiff repeats and incorporates by reference the paragraphs above.

181. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced, into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

FIFTH CLAIM FOR RELIEF

182. The Plaintiff repeats and incorporates by reference the paragraphs above.

183. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 542. Therefore, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 18 U.S.C. § 545.

SIXTH CLAIM FOR RELIEF

184. The Plaintiff repeats and incorporates by reference the paragraphs above.

185. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or

concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 18 U.S.C. § 545.

SEVENTH CLAIM FOR RELIEF

186. The Plaintiff repeats and incorporates by reference the paragraphs above.

187. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 18 U.S.C. § 545.

EIGHTH CLAIM FOR RELIEF

188. The Plaintiff repeats and incorporates by reference the paragraphs above.

189. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 18 U.S.C. § 545.

NINTH CLAIM FOR RELIEF

190. The Plaintiff repeats and incorporates by reference the paragraphs above.

191. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes proceeds obtained

directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TENTH CLAIM FOR RELIEF

192. The Plaintiff repeats and incorporates by reference the paragraphs above.

193. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ELEVENTH CLAIM FOR RELIEF

194. The Plaintiff repeats and incorporates by reference the paragraphs above.

195. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWELFTH CLAIM FOR RELIEF

196. The Plaintiff repeats and incorporates by reference the paragraphs above.

197. By the foregoing and other acts, defendant Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 542. Therefore, defendant

Diploma, Princeton University, Ph.D. in Mathematics, Issued to Alanum Mathison Turing is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

THIRTEENTH CLAIM FOR RELIEF

198. The Plaintiff repeats and incorporates by reference the paragraphs above.

199. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

FOURTEENTH CLAIM FOR RELIEF

200. The Plaintiff repeats and incorporates by reference the paragraphs above.

201. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

FIFTEENTH CLAIM FOR RELIEF

202. The Plaintiff repeats and incorporates by reference the paragraphs above.

203. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to

law, to wit 19 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SIXTEENTH CLAIM FOR RELIEF

204. The Plaintiff repeats and incorporates by reference the paragraphs above.

205. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SEVENTEENTH CLAIM FOR RELIEF

206. The Plaintiff repeats and incorporates by reference the paragraphs above.

207. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

EIGHTEENTH CLAIM FOR RELIEF

208. The Plaintiff repeats and incorporates by reference the paragraphs above.

209. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes merchandise that was

fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 545.

NINETEENTH CLAIM FOR RELIEF

210. The Plaintiff repeats and incorporates by reference the paragraphs above.

211. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWENTIETH CLAIM FOR RELIEF

212. The Plaintiff repeats and incorporates by reference the paragraphs above.

213. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWENTY-FIRST CLAIM FOR RELIEF

214. The Plaintiff repeats and incorporates by reference the paragraphs above.

215. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWENTY-SECOND CLAIM FOR RELIEF

216. The Plaintiff repeats and incorporates by reference the paragraphs above.

217. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWENTY-THIRD CLAIM FOR RELIEF

218. The Plaintiff repeats and incorporates by reference the paragraphs above.

219. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWENTY-FOURTH CLAIM FOR RELIEF

220. The Plaintiff repeats and incorporates by reference the paragraphs above.

221. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWENTY-FIFTH CLAIM FOR RELIEF

222. The Plaintiff repeats and incorporates by reference the paragraphs above.

223. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWENTY-SIXTH CLAIM FOR RELIEF

224. The Plaintiff repeats and incorporates by reference the paragraphs above.

225. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWENTY-SEVENTH CLAIM FOR RELIEF

226. The Plaintiff repeats and incorporates by reference the paragraphs above.

227. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry constitutes proceeds obtained directly or

indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Right, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWENTY-EIGHTH CLAIM FOR RELIEF

228. The Plaintiff repeats and incorporates by reference the paragraphs above.

229. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWENTY-NINTH CLAIM FOR RELIEF

230. The Plaintiff repeats and incorporates by reference the paragraphs above.

231. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

THIRTIETH CLAIM FOR RELIEF

232. The Plaintiff repeats and incorporates by reference the paragraphs above.

233. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes merchandise that was stolen,

smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

THIRTY-FIRST CLAIM FOR RELIEF

234. The Plaintiff repeats and incorporates by reference the paragraphs above.

235. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

THIRTY-SECOND CLAIM FOR RELIEF

236. The Plaintiff repeats and incorporates by reference the paragraphs above.

237. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

THIRTY-THIRD CLAIM FOR RELIEF

238. The Plaintiff repeats and incorporates by reference the paragraphs above.

239. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 545.

THIRTY-FOURTH CLAIM FOR RELIEF

240. The Plaintiff repeats and incorporates by reference the paragraphs above.

241. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 545.

THIRTY-FIFTH CLAIM FOR RELIEF

242. The Plaintiff repeats and incorporates by reference the paragraphs above.

243. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 545.

THIRTY-SIXTH CLAIM FOR RELIEF

244. The Plaintiff repeats and incorporates by reference the paragraphs above.

245. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 545.

THIRTY-SEVENTH CLAIM FOR RELIEF

246. The Plaintiff repeats and incorporates by reference the paragraphs above.

247. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 545.

THIRTY-EIGHTH CLAIM FOR RELIEF

248. The Plaintiff repeats and incorporates by reference the paragraphs above.

249. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

THIRTY-NINTH CLAIM FOR RELIEF

250. The Plaintiff repeats and incorporates by reference the paragraphs above.

251. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FORTIETH CLAIM FOR RELIEF

252. The Plaintiff repeats and incorporates by reference the paragraphs above.

253. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FORTY-FIRST CLAIM FOR RELIEF

254. The Plaintiff repeats and incorporates by reference the paragraphs above.

255. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FORTY-SECOND CLAIM FOR RELIEF

256. The Plaintiff repeats and incorporates by reference the paragraphs above.

257. By the foregoing and other acts, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing in Coat and Tie, Facing Left, By Elliott and Fry is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FORTY-THIRD CLAIM FOR RELIEF

258. The Plaintiff repeats and incorporates by reference the paragraphs above.

259. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

FORTY-FOURTH CLAIM FOR RELIEF

260. The Plaintiff repeats and incorporates by reference the paragraphs above.

261. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

FORTY-FIFTH CLAIM FOR RELIEF

262. The Plaintiff repeats and incorporates by reference the paragraphs above.

263. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

FORTY-SIXTH CLAIM FOR RELIEF

264. The Plaintiff repeats and incorporates by reference the paragraphs above.

265. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

FORTY-SEVENTH CLAIM FOR RELIEF

266. The Plaintiff repeats and incorporates by reference the paragraphs above.

267. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes merchandise that was stolen, smuggled, or clandestinely imported or

introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

FORTY-EIGHTH CLAIM FOR RELIEF

268. The Plaintiff repeats and incorporates by reference the paragraphs above.

269. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 18 U.S.C. § 545.

FORTY-NINTH CLAIM FOR RELIEF

270. The Plaintiff repeats and incorporates by reference the paragraphs above.

271. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 18 U.S.C. § 545.

FIFTIETH CLAIM FOR RELIEF

272. The Plaintiff repeats and incorporates by reference the paragraphs above.

273. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 18 U.S.C. § 545.

FIFTY-FIRST CLAIM FOR RELIEF

274. The Plaintiff repeats and incorporates by reference the paragraphs above.

275. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 18 U.S.C. § 545.

FIFTY-SECOND CLAIM FOR RELIEF

276. The Plaintiff repeats and incorporates by reference the paragraphs above.

277. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18

U.S.C. § 1343. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 18 U.S.C. § 545.

FIFTY-THIRD CLAIM FOR RELIEF

278. The Plaintiff repeats and incorporates by reference the paragraphs above.

279. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FIFTY-FOURTH CLAIM FOR RELIEF

280. The Plaintiff repeats and incorporates by reference the paragraphs above.

281. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FIFTY-FIFTH CLAIM FOR RELIEF

282. The Plaintiff repeats and incorporates by reference the paragraphs above.

283. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E.

constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FIFTY-SIXTH CLAIM FOR RELIEF

284. The Plaintiff repeats and incorporates by reference the paragraphs above.

285. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FIFTY-SEVENTH CLAIM FOR RELIEF

286. The Plaintiff repeats and incorporates by reference the paragraphs above.

287. By the foregoing and other acts, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Order of the British Empire Medal, Miniature, and Instruction Sheet, Contained in Box Gilded with O.B.E. is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

FIFTY-EIGHTH CLAIM FOR RELIEF

288. The Plaintiff repeats and incorporates by reference the paragraphs above.

289. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

FIFTY-NINTH CLAIM FOR RELIEF

290. The Plaintiff repeats and incorporates by reference the paragraphs above.

291. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SIXTIETH CLAIM FOR RELIEF

292. The Plaintiff repeats and incorporates by reference the paragraphs above.

293. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SIXTY-FIRST CLAIM FOR RELIEF

294. The Plaintiff repeats and incorporates by reference the paragraphs above.

295. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SIXTY-SECOND CLAIM FOR RELIEF

296. The Plaintiff repeats and incorporates by reference the paragraphs above.

297. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SIXTY-THIRD CLAIM FOR RELIEF

298. The Plaintiff repeats and incorporates by reference the paragraphs above.

299. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 18 U.S.C. § 545.

SIXTY-FOURTH CLAIM FOR RELIEF

300. The Plaintiff repeats and incorporates by reference the paragraphs above.

301. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 18 U.S.C. § 545.

SIXTY-FIFTH CLAIM FOR RELIEF

302. The Plaintiff repeats and incorporates by reference the paragraphs above.

303. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 18 U.S.C. § 545.

SIXTY-SIXTH CLAIM FOR RELIEF

304. The Plaintiff repeats and incorporates by reference the paragraphs above.

305. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Letter from

King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 18 U.S.C. § 545.

SIXTY-SEVENTH CLAIM FOR RELIEF

306. The Plaintiff repeats and incorporates by reference the paragraphs above.

307. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 18 U.S.C. § 545.

SIXTY-EIGHTH CLAIM FOR RELIEF

308. The Plaintiff repeats and incorporates by reference the paragraphs above.

309. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

SIXTY-NINTH CLAIM FOR RELIEF

310. The Plaintiff repeats and incorporates by reference the paragraphs above.

311. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Letter from

King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

SEVENTIETH CLAIM FOR RELIEF

312. The Plaintiff repeats and incorporates by reference the paragraphs above.

313. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

SEVENTY-FIRST CLAIM FOR RELIEF

314. The Plaintiff repeats and incorporates by reference the paragraphs above.

315. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

SEVENTY-SECOND CLAIM FOR RELIEF

316. The Plaintiff repeats and incorporates by reference the paragraphs above.

317. By the foregoing and other acts, defendant Letter from King George VI Presenting O.B.E. to Alan M. Turing Esq. constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Letter from

King George VI Presenting O.B.E. to Alan M. Turing Esq. is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

SEVENTY-THIRD CLAIM FOR RELIEF

318. The Plaintiff repeats and incorporates by reference the paragraphs above.

319. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SEVENTY-FOURTH CLAIM FOR RELIEF

320. The Plaintiff repeats and incorporates by reference the paragraphs above.

321. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SEVENTY-FIFTH CLAIM FOR RELIEF

322. The Plaintiff repeats and incorporates by reference the paragraphs above.

323. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SEVENTY-SIXTH CLAIM FOR RELIEF

324. The Plaintiff repeats and incorporates by reference the paragraphs above.

325. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SEVENTY-SEVENTH CLAIM FOR RELIEF

326. The Plaintiff repeats and incorporates by reference the paragraphs above.

327. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

SEVENTY-EIGHTH CLAIM FOR RELIEF

328. The Plaintiff repeats and incorporates by reference the paragraphs above.

329. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

SEVENTY-NINTH CLAIM FOR RELIEF

330. The Plaintiff repeats and incorporates by reference the paragraphs above.

331. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

EIGHTIETH CLAIM FOR RELIEF

332. The Plaintiff repeats and incorporates by reference the paragraphs above.

333. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

EIGHTY-FIRST CLAIM FOR RELIEF

334. The Plaintiff repeats and incorporates by reference the paragraphs above.

335. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

EIGHTY-SECOND CLAIM FOR RELIEF

336. The Plaintiff repeats and incorporates by reference the paragraphs above.

337. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

EIGHTY-THIRD CLAIM FOR RELIEF

338. The Plaintiff repeats and incorporates by reference the paragraphs above.

339. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

EIGHTY-FOURTH CLAIM FOR RELIEF

340. The Plaintiff repeats and incorporates by reference the paragraphs above.

341. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

EIGHTY-FIFTH CLAIM FOR RELIEF

342. The Plaintiff repeats and incorporates by reference the paragraphs above.

343. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

EIGHTY-SIXTH CLAIM FOR RELIEF

344. The Plaintiff repeats and incorporates by reference the paragraphs above.

345. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

EIGHTY-SEVENTH CLAIM FOR RELIEF

346. The Plaintiff repeats and incorporates by reference the paragraphs above.

347. By the foregoing and other acts, defendant Alan Turing's Hazelhurst School Report, December 1924 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Alan Turing's Hazelhurst School Report, December 1924 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

EIGHTY-EIGHTH CLAIM FOR RELIEF

348. The Plaintiff repeats and incorporates by reference the paragraphs above.

349. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

EIGHTY-NINTH CLAIM FOR RELIEF

350. The Plaintiff repeats and incorporates by reference the paragraphs above.

351. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

NINETYIETH CLAIM FOR RELIEF

352. The Plaintiff repeats and incorporates by reference the paragraphs above.

353. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

NINETY-FIRST CLAIM FOR RELIEF

354. The Plaintiff repeats and incorporates by reference the paragraphs above.

355. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

NINETY-SECOND CLAIM FOR RELIEF

356. The Plaintiff repeats and incorporates by reference the paragraphs above.

357. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

NINETY-THIRD CLAIM FOR RELIEF

358. The Plaintiff repeats and incorporates by reference the paragraphs above.

359. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

NINETY-FOURTH CLAIM FOR RELIEF

360. The Plaintiff repeats and incorporates by reference the paragraphs above.

361. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

NINETY-FIFTH CLAIM FOR RELIEF

362. The Plaintiff repeats and incorporates by reference the paragraphs above.

363. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

NINETY-SIXTH CLAIM FOR RELIEF

364. The Plaintiff repeats and incorporates by reference the paragraphs above.

365. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore,

defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

NINETY-SEVENTH CLAIM FOR RELIEF

366. The Plaintiff repeats and incorporates by reference the paragraphs above.

367. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

NINETY-EIGHTH CLAIM FOR RELIEF

368. The Plaintiff repeats and incorporates by reference the paragraphs above.

369. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

NINETY-NINTH CLAIM FOR RELIEF

370. The Plaintiff repeats and incorporates by reference the paragraphs above.

371. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Alan

Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDREDTH CLAIM FOR RELIEF

372. The Plaintiff repeats and incorporates by reference the paragraphs above.

373. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND FIRST CLAIM FOR RELIEF

374. The Plaintiff repeats and incorporates by reference the paragraphs above.

375. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND SECOND CLAIM FOR RELIEF

376. The Plaintiff repeats and incorporates by reference the paragraphs above.

377. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND THIRD CLAIM FOR RELIEF

378. The Plaintiff repeats and incorporates by reference the paragraphs above.

379. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND FOURTH CLAIM FOR RELIEF

380. The Plaintiff repeats and incorporates by reference the paragraphs above.

381. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND FIFTH CLAIM FOR RELIEF

382. The Plaintiff repeats and incorporates by reference the paragraphs above.

383. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne

School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND SIXTH CLAIM FOR RELIEF

384. The Plaintiff repeats and incorporates by reference the paragraphs above.

385. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDREDDTH AND SEVENTH CLAIM FOR RELIEF

386. The Plaintiff repeats and incorporates by reference the paragraphs above.

387. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND EIGHTH CLAIM FOR RELIEF

388. The Plaintiff repeats and incorporates by reference the paragraphs above.

389. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or

concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND NINTH CLAIM FOR RELIEF

390. The Plaintiff repeats and incorporates by reference the paragraphs above.

391. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND TENTH CLAIM FOR RELIEF

392. The Plaintiff repeats and incorporates by reference the paragraphs above.

393. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND ELEVENTH CLAIM FOR RELIEF

394. The Plaintiff repeats and incorporates by reference the paragraphs above.

395. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes merchandise that was

fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND TWELFTH CLAIM FOR RELIEF

396. The Plaintiff repeats and incorporates by reference the paragraphs above.

397. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND THIRTEENTH CLAIM FOR RELIEF

398. The Plaintiff repeats and incorporates by reference the paragraphs above.

399. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND FOURTEENTH CLAIM FOR RELIEF

400. The Plaintiff repeats and incorporates by reference the paragraphs above.

401. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes proceeds obtained directly

or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND FIFTEENTH CLAIM FOR RELIEF

402. The Plaintiff repeats and incorporates by reference the paragraphs above.

403. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND SIXTEENTH CLAIM FOR RELIEF

404. The Plaintiff repeats and incorporates by reference the paragraphs above.

405. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND SEVENTEENTH CLAIM FOR RELIEF

406. The Plaintiff repeats and incorporates by reference the paragraphs above.

407. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Second-Half Summer Term 1926 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Alan

Turing's Sherborne School Report, Second-Half Summer Term 1926 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND EIGHTEENTH CLAIM FOR RELIEF

408. The Plaintiff repeats and incorporates by reference the paragraphs above.

409. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND NINETEENTH CLAIM FOR RELIEF

410. The Plaintiff repeats and incorporates by reference the paragraphs above.

411. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND TWENTIETH CLAIM FOR RELIEF

412. The Plaintiff repeats and incorporates by reference the paragraphs above.

413. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States

contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND TWENTY-FIRST CLAIM FOR RELIEF

414. The Plaintiff repeats and incorporates by reference the paragraphs above.

415. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND TWENTY-SECOND CLAIM FOR RELIEF

416. The Plaintiff repeats and incorporates by reference the paragraphs above.

417. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND TWENTY-THIRD CLAIM FOR RELIEF

418. The Plaintiff repeats and incorporates by reference the paragraphs above.

419. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes merchandise that was

fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND TWENTY-FOURTH CLAIM FOR RELIEF

420. The Plaintiff repeats and incorporates by reference the paragraphs above.

421. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND TWENTY-FIFTH CLAIM FOR RELIEF

422. The Plaintiff repeats and incorporates by reference the paragraphs above.

423. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND TWENTY-SIXTH CLAIM FOR RELIEF

424. The Plaintiff repeats and incorporates by reference the paragraphs above.

425. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND TWENTY-SEVENTH CLAIM FOR RELIEF

426. The Plaintiff repeats and incorporates by reference the paragraphs above.

427. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND TWENTY-EIGHTH CLAIM FOR RELIEF

428. The Plaintiff repeats and incorporates by reference the paragraphs above.

429. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND TWENTY-NINTH CLAIM FOR RELIEF

430. The Plaintiff repeats and incorporates by reference the paragraphs above.

431. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND THIRTIETH CLAIM FOR RELIEF

432. The Plaintiff repeats and incorporates by reference the paragraphs above.

433. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND THIRTY-ONE CLAIM FOR RELIEF

434. The Plaintiff repeats and incorporates by reference the paragraphs above.

435. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND THIRTY-TWO CLAIM FOR RELIEF

436. The Plaintiff repeats and incorporates by reference the paragraphs above.

437. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 constitutes proceeds obtained directly

or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, First-Half Michaelmas Term 1927 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND THIRTY-THREE CLAIM FOR RELIEF

438. The Plaintiff repeats and incorporates by reference the paragraphs above.

439. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND THIRTY-FOUR CLAIM FOR RELIEF

440. The Plaintiff repeats and incorporates by reference the paragraphs above.

441. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND THIRTY-FIVE CLAIM FOR RELIEF

442. The Plaintiff repeats and incorporates by reference the paragraphs above.

443. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19

U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND THIRTY-SIXTH CLAIM FOR RELIEF

444. The Plaintiff repeats and incorporates by reference the paragraphs above.

445. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND THIRTY-SEVENTH CLAIM FOR RELIEF

446. The Plaintiff repeats and incorporates by reference the paragraphs above.

447. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND THIRTY-EIGHTH CLAIM FOR RELIEF

448. The Plaintiff repeats and incorporates by reference the paragraphs above.

449. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan

Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND THIRTY-NINTH CLAIM FOR RELIEF

450. The Plaintiff repeats and incorporates by reference the paragraphs above.

451. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND FORTIETH CLAIM FOR RELIEF

452. The Plaintiff repeats and incorporates by reference the paragraphs above.

453. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND FORTY-FIRST CLAIM FOR RELIEF

454. The Plaintiff repeats and incorporates by reference the paragraphs above.

455. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after

importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND FORTY-SECOND CLAIM FOR RELIEF

456. The Plaintiff repeats and incorporates by reference the paragraphs above.

457. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND FORTY-EIGHTH CLAIM FOR RELIEF

458. The Plaintiff repeats and incorporates by reference the paragraphs above.

459. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND FORTY-NINTH CLAIM FOR RELIEF

460. The Plaintiff repeats and incorporates by reference the paragraphs above.

461. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne

School Report, Lent Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND FIFTIETH CLAIM FOR RELIEF

462. The Plaintiff repeats and incorporates by reference the paragraphs above.

463. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND FIFTY-FIRST CLAIM FOR RELIEF

464. The Plaintiff repeats and incorporates by reference the paragraphs above.

465. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, Lent Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND FIFTY-SECOND CLAIM FOR RELIEF

466. The Plaintiff repeats and incorporates by reference the paragraphs above.

467. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Lent Term 1931 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne

School Report, Lent Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND FIFTY-EIGHTH CLAIM FOR RELIEF

468. The Plaintiff repeats and incorporates by reference the paragraphs above.

469. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND FIFTY-NINTH CLAIM FOR RELIEF

470. The Plaintiff repeats and incorporates by reference the paragraphs above.

471. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND SIXTIETH CLAIM FOR RELIEF

472. The Plaintiff repeats and incorporates by reference the paragraphs above.

473. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND SIXTY-FIRST CLAIM FOR RELIEF

474. The Plaintiff repeats and incorporates by reference the paragraphs above.

475. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND SIXTY-SECOND CLAIM FOR RELIEF

476. The Plaintiff repeats and incorporates by reference the paragraphs above.

477. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND SIXTY-THIRD CLAIM FOR RELIEF

478. The Plaintiff repeats and incorporates by reference the paragraphs above.

479. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND SIXTY-FOURTH CLAIM FOR RELIEF

480. The Plaintiff repeats and incorporates by reference the paragraphs above.

481. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND SIXTY-FIFTH CLAIM FOR RELIEF

482. The Plaintiff repeats and incorporates by reference the paragraphs above.

483. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND SIXTY-SIXTH CLAIM FOR RELIEF

484. The Plaintiff repeats and incorporates by reference the paragraphs above.

485. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND SIXTY-SEVENTH CLAIM FOR RELIEF

486. The Plaintiff repeats and incorporates by reference the paragraphs above.

487. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND SIXTY-EIGHTH CLAIM FOR RELIEF

488. The Plaintiff repeats and incorporates by reference the paragraphs above.

489. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND SIXTY-NINTH CLAIM FOR RELIEF

490. The Plaintiff repeats and incorporates by reference the paragraphs above.

491. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND SEVENTIETH CLAIM FOR RELIEF

492. The Plaintiff repeats and incorporates by reference the paragraphs above.

493. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND SEVENTY-FIRST CLAIM FOR RELIEF

494. The Plaintiff repeats and incorporates by reference the paragraphs above.

495. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND SEVENTY-SECOND CLAIM FOR RELIEF

496. The Plaintiff repeats and incorporates by reference the paragraphs above.

497. By the foregoing and other acts, defendant Alan Turing's Sherborne School Report, Summer Term 1931 constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Alan Turing's Sherborne School Report, Summer Term 1931 is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND SEVENTY-THIRD CLAIM FOR RELIEF

498. The Plaintiff repeats and incorporates by reference the paragraphs above.

499. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND SEVENTY-FOURTH CLAIM FOR RELIEF

500. The Plaintiff repeats and incorporates by reference the paragraphs above.

501. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND SEVENTY-FIFTH CLAIM FOR RELIEF

502. The Plaintiff repeats and incorporates by reference the paragraphs above.

503. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by

Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND SEVENTY-SIXTH CLAIM FOR RELIEF

504. The Plaintiff repeats and incorporates by reference the paragraphs above.

505. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND SEVENTY-SEVENTH CLAIM FOR RELIEF

506. The Plaintiff repeats and incorporates by reference the paragraphs above.

507. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND SEVENTY-EIGHTH CLAIM FOR RELIEF

508. The Plaintiff repeats and incorporates by reference the paragraphs above.

509. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND SEVENTY-NINTH CLAIM FOR RELIEF

510. The Plaintiff repeats and incorporates by reference the paragraphs above.

511. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND EIGHTIETH CLAIM FOR RELIEF

512. The Plaintiff repeats and incorporates by reference the paragraphs above.

513. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photostat Copy of Précis of the

Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND EIGHTY-FIRST CLAIM FOR RELIEF

514. The Plaintiff repeats and incorporates by reference the paragraphs above.

515. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND EIGHTY-SECOND CLAIM FOR RELIEF

516. The Plaintiff repeats and incorporates by reference the paragraphs above.

517. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND EIGHTY-THIRD CLAIM FOR RELIEF

518. The Plaintiff repeats and incorporates by reference the paragraphs above.

519. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND EIGHTY-FOURTH CLAIM FOR RELIEF

520. The Plaintiff repeats and incorporates by reference the paragraphs above.

521. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND EIGHTY-FIFTH CLAIM FOR RELIEF

522. The Plaintiff repeats and incorporates by reference the paragraphs above.

523. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age

Fifteen and a Half is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND EIGHTY-SIXTH CLAIM FOR RELIEF

524. The Plaintiff repeats and incorporates by reference the paragraphs above.

525. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND EIGHTY-SEVENTH FOR RELIEF

526. The Plaintiff repeats and incorporates by reference the paragraphs above.

527. By the foregoing and other acts, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Photostat Copy of Précis of the Theory of Relativity by Albert Einstein Prepared by Alan Turing for his Mother at age Fifteen and a Half is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND EIGHTY-EIGHTH CLAIM FOR RELIEF

528. The Plaintiff repeats and incorporates by reference the paragraphs above.

529. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND EIGHTY-NINTH CLAIM FOR RELIEF

530. The Plaintiff repeats and incorporates by reference the paragraphs above.

531. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND NINETY CLAIM FOR RELIEF

532. The Plaintiff repeats and incorporates by reference the paragraphs above.

533. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND NINETY-FIRST CLAIM FOR RELIEF

534. The Plaintiff repeats and incorporates by reference the paragraphs above.

535. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND NINETY-SECOND CLAIM FOR RELIEF

536. The Plaintiff repeats and incorporates by reference the paragraphs above.

537. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

ONE HUNDRED AND NINETY-THIRD CLAIM FOR RELIEF

538. The Plaintiff repeats and incorporates by reference the paragraphs above.

539. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND NINETY-FOURTH CLAIM FOR RELIEF

540. The Plaintiff repeats and incorporates by reference the paragraphs above.

541. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND NINETY-FIFTH CLAIM FOR RELIEF

542. The Plaintiff repeats and incorporates by reference the paragraphs above.

543. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND NINETY-SIXTH CLAIM FOR RELIEF

544. The Plaintiff repeats and incorporates by reference the paragraphs above.

545. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND NINETY-SEVENTH CLAIM FOR RELIEF

546. The Plaintiff repeats and incorporates by reference the paragraphs above.

547. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 18 U.S.C. § 545.

ONE HUNDRED AND NINETY-EIGHTH CLAIM FOR RELIEF

548. The Plaintiff repeats and incorporates by reference the paragraphs above.

549. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

ONE HUNDRED AND NINETY-NINTH CLAIM FOR RELIEF

550. The Plaintiff repeats and incorporates by reference the paragraphs above.

551. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDREDDTH CLAIM FOR RELIEF

552. The Plaintiff repeats and incorporates by reference the paragraphs above.

553. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND FIRST CLAIM FOR RELIEF

554. The Plaintiff repeats and incorporates by reference the paragraphs above.

555. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND SECOND CLAIM FOR RELIEF

556. The Plaintiff repeats and incorporates by reference the paragraphs above.

557. By the foregoing and other acts, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Tan Postcard, with Caption Reading “The Universal Electronic Computer Installed at Manchester University by Ferranti Limited, Who Are Manufacturing Under Licence from the Corporation” With Handwriting “Alan Standing” is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND THIRD CLAIM FOR RELIEF

558. The Plaintiff repeats and incorporates by reference the paragraphs above.

559. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND FOURTH CLAIM FOR RELIEF

560. The Plaintiff repeats and incorporates by reference the paragraphs above.

561. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan

Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND FIFTH CLAIM FOR RELIEF

562. The Plaintiff repeats and incorporates by reference the paragraphs above.

563. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND SIXTH CLAIM FOR RELIEF

564. The Plaintiff repeats and incorporates by reference the paragraphs above.

565. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND SEVENTH CLAIM FOR RELIEF

566. The Plaintiff repeats and incorporates by reference the paragraphs above.

567. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States

contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND EIGHTH CLAIM FOR RELIEF

568. The Plaintiff repeats and incorporates by reference the paragraphs above.

569. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND NINTH CLAIM FOR RELIEF

570. The Plaintiff repeats and incorporates by reference the paragraphs above.

571. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND TENTH CLAIM FOR RELIEF

572. The Plaintiff repeats and incorporates by reference the paragraphs above.

573. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes merchandise that was

fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND ELEVENTH CLAIM FOR RELIEF

574. The Plaintiff repeats and incorporates by reference the paragraphs above.

575. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND TWELFTH CLAIM FOR RELIEF

576. The Plaintiff repeats and incorporates by reference the paragraphs above.

577. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND THIRTEENTH CLAIM FOR RELIEF

578. The Plaintiff repeats and incorporates by reference the paragraphs above.

579. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND FOURTEENTH CLAIM FOR RELIEF

580. The Plaintiff repeats and incorporates by reference the paragraphs above.

581. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND FIFTEENTH CLAIM FOR RELIEF

582. The Plaintiff repeats and incorporates by reference the paragraphs above.

583. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND SIXTEENTH CLAIM FOR RELIEF

584. The Plaintiff repeats and incorporates by reference the paragraphs above.

585. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes proceeds obtained directly

or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND SEVENTEENTH CLAIM FOR RELIEF

586. The Plaintiff repeats and incorporates by reference the paragraphs above.

587. By the foregoing and other acts, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing, Facing Right, Verso Reads “Alan M. Turing 1936” is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND EIGHTEENTH CLAIM FOR RELIEF

588. The Plaintiff repeats and incorporates by reference the paragraphs above.

589. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND NINETEENTH CLAIM FOR RELIEF

590. The Plaintiff repeats and incorporates by reference the paragraphs above.

591. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States

contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND TWENTIETH CLAIM FOR RELIEF

592. The Plaintiff repeats and incorporates by reference the paragraphs above.

593. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND TWENTY-FIRST CLAIM FOR RELIEF

594. The Plaintiff repeats and incorporates by reference the paragraphs above.

595. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND TWENTY-SECOND CLAIM FOR RELIEF

596. The Plaintiff repeats and incorporates by reference the paragraphs above.

597. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes merchandise that was

fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND TWENTY-THIRD CLAIM FOR RELIEF

598. The Plaintiff repeats and incorporates by reference the paragraphs above.

599. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND TWENTY-FOURTH CLAIM FOR RELIEF

600. The Plaintiff repeats and incorporates by reference the paragraphs above.

601. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND TWENTY-FIFTH CLAIM FOR RELIEF

602. The Plaintiff repeats and incorporates by reference the paragraphs above.

603. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND TWENTY-SIXTH CLAIM FOR RELIEF

604. The Plaintiff repeats and incorporates by reference the paragraphs above.

605. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND TWENTY-SEVENTH CLAIM FOR RELIEF

606. The Plaintiff repeats and incorporates by reference the paragraphs above.

607. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND TWENTY-EIGHTH CLAIM FOR RELIEF

608. The Plaintiff repeats and incorporates by reference the paragraphs above.

609. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND TWENTY-NINTH CLAIM FOR RELIEF

610. The Plaintiff repeats and incorporates by reference the paragraphs above.

611. By the foregoing and other acts, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing, Three-Quarter Portrait in Coat and Tie, Facing Right is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND THIRTIETH CLAIM FOR RELIEF

612. The Plaintiff repeats and incorporates by reference the paragraphs above.

613. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND THIRTY-FIRST CLAIM FOR RELIEF

614. The Plaintiff repeats and incorporates by reference the paragraphs above.

615. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes merchandise that was stolen, smuggled, or clandestinely imported

or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND THIRTY-SECOND CLAIM FOR RELIEF

616. The Plaintiff repeats and incorporates by reference the paragraphs above.

617. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND THIRTY-THIRD CLAIM FOR RELIEF

618. The Plaintiff repeats and incorporates by reference the paragraphs above.

619. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND THIRTY-FOURTH CLAIM FOR RELIEF

620. The Plaintiff repeats and incorporates by reference the paragraphs above.

621. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore,

defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND THIRTY-FIFTH CLAIM FOR RELIEF

622. The Plaintiff repeats and incorporates by reference the paragraphs above.

623. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND THIRTY-SIXTH CLAIM FOR RELIEF

624. The Plaintiff repeats and incorporates by reference the paragraphs above.

625. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND THIRTY-SEVENTH CLAIM FOR RELIEF

626. The Plaintiff repeats and incorporates by reference the paragraphs above.

627. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND THIRTY-EIGHTH CLAIM FOR RELIEF

628. The Plaintiff repeats and incorporates by reference the paragraphs above.

629. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND THIRTY-NINTH CLAIM FOR RELIEF

630. The Plaintiff repeats and incorporates by reference the paragraphs above.

631. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND FORTIETH CLAIM FOR RELIEF

632. The Plaintiff repeats and incorporates by reference the paragraphs above.

633. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND FORTY-FIRST CLAIM FOR RELIEF

634. The Plaintiff repeats and incorporates by reference the paragraphs above.

635. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2315. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND FORTY-SECOND CLAIM FOR RELIEF

636. The Plaintiff repeats and incorporates by reference the paragraphs above.

637. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND FORTY-EIGHTH CLAIM FOR RELIEF

638. The Plaintiff repeats and incorporates by reference the paragraphs above.

639. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND FORTY-NINTH CLAIM FOR RELIEF

1. The Plaintiff repeats and incorporates by reference the paragraphs above.

2. By the foregoing and other acts, defendant Photograph of Alan Turing Running constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Photograph of Alan Turing Running is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND FIFTIETH CLAIM FOR RELIEF

640. The Plaintiff repeats and incorporates by reference the paragraphs above.

641. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND FIFTY-FIRST CLAIM FOR RELIEF

642. The Plaintiff repeats and incorporates by reference the paragraphs above.

643. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND FIFTY-SECOND CLAIM FOR RELIEF

644. The Plaintiff repeats and incorporates by reference the paragraphs above.

645. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photocopy of Postcard from Alan

Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND FIFTY-THIRD CLAIM FOR RELIEF

646. The Plaintiff repeats and incorporates by reference the paragraphs above.

647. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND FIFTY-FOURTH CLAIM FOR RELIEF

648. The Plaintiff repeats and incorporates by reference the paragraphs above.

649. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes merchandise that was stolen, smuggled, or clandestinely imported or introduced into the United States contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 19 U.S.C. § 1595a.

TWO HUNDRED AND FIFTY-FIFTH CLAIM FOR RELIEF

650. The Plaintiff repeats and incorporates by reference the paragraphs above.

651. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or

concealed after importation, contrary to law, to wit 19 U.S.C. § 1590. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND FIFTY-SIXTH CLAIM FOR RELIEF

652. The Plaintiff repeats and incorporates by reference the paragraphs above.

653. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2314. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND FIFTY-SEVENTH CLAIM FOR RELIEF

654. The Plaintiff repeats and incorporates by reference the paragraphs above.

655. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 2315. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND FIFTY-EIGHTH CLAIM FOR RELIEF

656. The Plaintiff repeats and incorporates by reference the paragraphs above.

657. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes merchandise that was

fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1341. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND FIFTY-NINTH CLAIM FOR RELIEF

658. The Plaintiff repeats and incorporates by reference the paragraphs above.

659. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes merchandise that was fraudulently or knowingly imported or brought into the United States or received or concealed after importation, contrary to law, to wit 18 U.S.C. § 1343. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 18 U.S.C. § 545.

TWO HUNDRED AND SIXTIETH CLAIM FOR RELIEF

660. The Plaintiff repeats and incorporates by reference the paragraphs above.

661. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 2314. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND SIXTY-FIRST CLAIM FOR RELIEF

662. The Plaintiff repeats and incorporates by reference the paragraphs above.

663. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes proceeds obtained directly or

indirectly as a result of violation of 18 U.S.C. § 2315. Therefore defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND SIXTY-SECOND CLAIM FOR RELIEF

664. The Plaintiff repeats and incorporates by reference the paragraphs above.

665. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1341. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND SIXTY-THIRD CLAIM FOR RELIEF

666. The Plaintiff repeats and incorporates by reference the paragraphs above.

667. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1343. Therefore, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

TWO HUNDRED AND SIXTY-FOURTH CLAIM FOR RELIEF

668. The Plaintiff repeats and incorporates by reference the paragraphs above.

669. By the foregoing and other acts, defendant Photocopy of Postcard from Alan Turing to his Mother with Blue Ink Notes constitutes proceeds obtained directly or indirectly as a result of violation of 18 U.S.C. § 1590. Therefore, defendant Photocopy

of Postcard from Alan Turing to his Mother with Blue Ink Notes is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE, the United States prays for entry of a final order of forfeiture for the Defendant property in favor of the United States, that the United States be authorized to dispose of the defendant property in accordance with law, and that the Court enter a finding of probable cause for the seizure of the defendant property and issue a Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465.

DATED this 17th day of January, 2020.

Respectfully submitted,

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