

2. The Citi 8948 account was owned by Kim Tim Jim Vestor, also known as Kim Dotcom, and had a balance of 52,189 HKD. From April 29, 2009 to November 16, 2009, the DBS 0320 account made the following wire transfers to the Citi 8948 account: three transfers totaling 19,397,500 HKD; one wire transfer totaling 108,069.16 Euro; and five wire transfers totaling \$449,000 USD. *Id.* at 50.
3. The Citi 9938 account was owned by Kim Tim Jim Vestor, also known as Kim Dotcom, and had a balance of 135,464,800 HKD. *Id.* at 51. The account was opened around May 2008 and every transfer into the account came from either the Citi 8921 or the Citi 8948 account. *Id.* at 52.
4. The DBS 6160 account, held in the name of Vestor Limited, had a balance of 520,185 HKD. This account received the following wire transfers from the DBS 0320 account: 1,000,000 HKD on February 1, 2010; 17,000,000 HKD on February 8, 2011; \$100,000 U.S. dollars on February 1, 2010.
5. The HSBC 9833 account was held in the name of Bencko and had a balance of 4,824,622. The account received the following transfers from the DBS 0320 account: 3,750,100 HKD on January 21, 2010; 7,942,690 on March 17, 2011; and 10 wire transfers totaling 58,890 EUR from November 2, 2009 to May 4, 2011. *Id.* at ¶¶ 55-56.
6. The DBS 0894 account was held in the name of Megamedia Limited. The account received the following wire transfers from the DBS 0320 account: 1.6 million HKD on July 10, 2009; 2.7 million HKD on September 24, 2009; two transfers totaling 575,153.54 EUR on June 17, 2009 and January 17, 2011; and 1.05 million USD on September 7, 2009. *Id.* at ¶¶ 57-58.

7. The HSBC 7833 account was held in the name of Echternach and had a balance of 6,510,966 HKD. From June 5, 2008 to July 50, 2011, the account received three transfers from the DBS 0320 account totaling 4,921,177.21 HKD. *Id.* at ¶¶ 59-60.
8. The DBS 4440 account was owned by Megapay Limited and had a balance of 7,159,308 HKD. Between April 22, 2010 and April 19, 2011, the account received the following transfers from the DBS 0320 account: one transfer of 1.5 million HKD; four transfers totaling \$700,000 USD. *Id.* at ¶¶ 61-62.
9. The HSBC 3833 account was held in the name of van der Kolk and had a balance of 16,096,412 HKD. From April 27, 2009 to December 20, 2012, the account received the following transfers from the DBS 0320 account: three transfers totaling 23,511,383 HKD; two transfers totaling 105,010 EUR. *Id.* at ¶¶ 63-64.
10. The HSBC 5833 account was held in the name of Batato and had a balance of 2,291,348 HKD. The account received a wire transfer from the DBS 0320 account on June 3, 2008 of 150,000 HKD and two transfers on December 1 and 20, 2010 totaling 23,605.42 EUR. *Id.* at ¶¶ 65-66.
11. The HSBC 4833 account was held in the name of Ortmann and had a balance of 101,680,294 HKD. From February 10, 2009 to April 4, 2011, it received 18 wire transfers from the DBS 0320 account totaling 109,064,765 HKD. *Id.* at ¶¶ 67-68.
12. The ICBC 8434 account was held in Ortmann's name and had a balance of 11,202,268. On March 17, 2011 and July 5, 2011, the account received transfers from the DBS 0320 account of 1.2 million HKD and 10 million HKD respectively. *Id.* at ¶¶ 69-70.

13. The HSBC 2088 account was held in van der Kolk's name and had a balance of 533,349.55 NZD. From April 26, 2011 to May 32, 2011, the account received four transfers from the HSBC 3833 account totaling 407,500 NZD. *Id.* at 73-74.
14. The ANZ 5900 account was held in the name of Megastuff Limited and had a balance of 407,500 NZD. From May 13, 2010 to March 17, 2011, the account received the following transfers: 17 transfers from the DBS 0320 account totaling 70,825,100 HKD and one transfer from the DBS 6160 account totaling 5,315,000 HKD. Funds from the ANZ 5900 account were used to purchase many of the properties listed below. *Id.* at 75.

New Zealand Bank Accounts

15. The Westpac account was held in the name of Simpson Grierson Trust Account, holder Kim Dotcom. From January 1, 2010 to December 16, 2011, the account received the following transfers: multiple transfers from the DBS 0320 account totaling 1.2 million NZD; and multiple transfers totaling over 31 million NZD from the DBS 6160 account. A number of properties listed below were purchased using funds from the Westpac account. *Id.* at ¶ 76.
16. The ASB 2100 account was held in the name of Kim Tim Jim Vestor, also known as Kim Dotcom. From February 8, 2010 to May 3, 2010, the account received seven wire transfers from the DBS 0320 account totaling 15,041,700 HKD. The funds in the account were used to purchase some of the properties listed below. *Id.* at ¶ 77.
17. The BNZ 0004 account, held in the name of Cleaver Richards Limited Trust Account for Megastuff Limited, received six wire transfers from the DBS 0320 account totaling

8,632,850 HKD. These transfers occurred from about May 11, 2011 to July 21, 2011.

Id. at 78. The funds were used to purchase a vehicle listed below. *Id.* at ¶ 78.

Vehicles

The following vehicles were purchased using funds from the ANZ 5900 account: (*Id.* at 75).

1. The 2009 Calcite White Mercedes Benz was registered to Megastuff Limited and purchased on May 28, 2010 with 130,000 NZD transferred from the ANZ 5900 account.
2. The 2005 Silver Mercedes Benz CLK DTM was purchased around May 28, 2010 using 400,000 NZD transferred from the ANZ 5900 account. The vehicle was registered to an individual named Wayne Tempero.
3. Two Black Mini cooper S coupes were registered to Megastuff and were purchased around November 12, 2010 using 45,218 NZD transferred from the ANZ 5900 account, and in part through a trade-in of two other Mini Coopers valued at 76,000 NZD. On November 23, 2012, the vehicles were sold at auction for a total of 66,000 NZD.
4. The 2010 Mercedes Benz was registered to Wayne Tempero and purchased for 160,000 NZD on January 6, 2011. The vehicle was sold at auction for 83,000 NZD on November 23, 2012, and the funds were deposited into the Official Assignee's trust account.
5. The 2011 Black Toyota Hilux was purchased on January 24, 2011 for 62,555 NZD and registered to an individual named Neil Stratful.
6. The 2010 Black Mercedes Benz CL 63 was purchased for 320,000 NZD on February 9, 2011 and registered to Wayne Tempero.
7. The Victor Conti Dutch Angel Bike was purchased for 68,679.35 NZD on July 19, 2010.

8. The 2004 Silver Mercedes Benz CLK DTM was purchased around November 12, 2010 for a total of around \$ 312,784.86 using funds transferred from the ANZ 5900 account.

The following vehicles were purchased using funds from the ASB 2100 account: (*Id.* at 77)

9. The 2008 Black Rolls Royce Phantom was purchased around March 30, 2010 for 535,000 NZD and registered to Wayne Tempero.
10. The 2004 Silver Mercedes Benz CLK DTM was purchased on April 16, 2010 for 310,000 NZD and was registered to Wayne Tempero.
11. The 2010 Black Mercedes Benz E63 was purchased on February 26, 2010 for 231,000 NZD and was registered to Megastuff.
12. The 2009 Black Mercedes Benz ML63 was purchased on March 11, 2010 for 155,000 NZD and was registered to Wayne Tempero.
13. The 1957 Black Cadillac El Dorado was purchased on March 5, 2010 for 144,400 NZD.
14. The 1959 Pink Cadillac series 62 was purchased on May 4, 2010 for 150,000 NZD.
15. The 2010 Black Mercedes Benz S65 was purchased on November 2, 2009 for 323,000 NZD. Funds from the DBS 0320 account were also used for the purchase of this vehicle. The vehicle was registered to an individual named Andrew Bowden.
16. The 2010 Black Mercedes Benz CL 65 was purchased on March 18, 2010, using funds from both the ASB 2100 account and the DBS 0320 account, for a total of over 600,000 NZD. The vehicle was registered to Wayne Tempero.

The following vehicles were purchased using funds from the BNZ 0004 account, which was held in the name of Cleaver Richards Limited Trust Account for Megastuff Limited: (*Id.* at 78)

17. The 2011 Black Mercedes Benz G55 AMG was purchased on December 8, 2011 for about 149,200 NZD. The cost of the vehicle was offset through a trade-in of a 2009 Mercedes Benz ML63. The vehicle was registered to Tempero.

18. The 2011 Mercedes Benz G55 was purchased in 2011 using funds from the BNZ 0004 account and the DBS 0320 account. It was registered to Tempero.

Other vehicles

19. The 2005 Silver Mercedes Benz A170 was purchased on May 2, 2011 and registered to van der Kolk. Van der Kolk had no reported legitimate income during that time period for purchasing the vehicle.

20. The 2005 Silver Mercedes Benz ML500 was purchased on May 16, 2011 and registered to van der Kolk. Van der Kolk had no reported legitimate income during that time period for purchasing the vehicle.

Miscellaneous

1. Four jet skis were purchased around November 19, 2010 using approximately 82,229.65 NZD from the ANZ 5900 account.


2. Two sharp 108 LCD TV screens were purchased on November 30, 2009 using 2.3 million HKD from the DBS 0320 account.

3. Three Samsung 82" LCD TVs were purchased around November 18, 2010 using 1,238,000 HKD from the DBS 0320 account.

4. One Devon Works time piece was purchased around December 1, 2010 using \$10,000 U.S. dollars from the DBS 0320 account.

5. An artwork was purchased on March 3, 2010 for about 1.06 million HKD from the DBS 0320 account.

Date: March 25, 2015
Alexandria, Virginia


/s/ _____
Liam O'Grady
United States District Judge