

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ONE WHITE CRYSTAL-COVERED "BAD
TOUR" GLOVE AND OTHER MICHAEL
JACKSON MEMORABILIA;
REAL PROPERTY LOCATED ON
SWEETWATER MESA ROAD IN MALIBU,
CALIFORNIA; ONE 2011 FERRARI 599
GTO,

Defendants.

No. CV 11-3582-GW-SS

Consolidated With CV 13-9169-GW-SS

Hon. George H. Wu

**DECLARATION OF THE HON. SUSAN N.
STEVENSON**

Hearing Date: July 8, 2021

Time: 8:30 a.m.

Place: Courtroom No. 9D

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1) I am the United States Ambassador to the Republic of Equatorial Guinea, a position I have held since March 2019. In that capacity, I represent the interests and policies of the United States in Equatorial Guinea. I am responsible for coordinating the activities of all foreign services officers and locally employed staff in Equatorial Guinea, as well as the activities of representatives of other U.S. government departments and agencies in Equatorial Guinea.

2) I personally have been involved in negotiations to distribute funds from the resolution of this matter to the people of Equatorial Guinea pursuant to the terms of the Settlement Agreement.

3) From March 2019 through January 2021, I participated in negotiations to distribute funds to two non-profit organizations operating within Equatorial Guinea. Those efforts failed when

1 Teodoro Nguema Obiang Mangue (Mr. Obiang Mangue) attempted to make
2 material changes to the memorandum of understanding regarding the
3 disbursement of funds at the last minute. A copy of the unexecuted
4 memorandum of understanding, including the changes made by Mr. Obiang
5 Mangue, is attached as Ex. A.

6 4) On February 25, 2021, during a meeting with Foreign
7 Minister Simeon Oyono Esono Angue, I was shown a copy of a check made
8 out to Mr. Obiang Mangue in the amount of \$1.4 million. I was told
9 by Minister Esono Angue that these funds were being provided to Mr.
10 Obiang Mangue as part of the resolution of a lawsuit regarding the
11 sale of his Malibu mansion, which was sold as part of the settlement
12 agreement in this matter. Minister Esono Angue told me Mr. Obiang
13 Mangue was having difficulty taking the funds out of the United
14 States and asked me to investigate what was preventing this.

15 5) I have since learned that representatives of Mr. Obiang
16 Mangue deposited \$6.4 million in funds, representing the settlement
17 of the lawsuit concerning the sale of the Malibu mansion, into a
18 trust account held by U.S. lawyers for the government of Equatorial
19 Guinea.

20 6) In January 2021, I was selected to be the United States
21 representative to the three-member panel formed to distribute
22 proceeds of the settlement of the above captioned matter. Mr. Obiang
23 Mangue's panel representative is the Hon. Miguel Ntutumu Evuna, the
24 ambassador from Equatorial Guinea to the United States, and the panel
25 chair is the Hon. Alberto Fernandez.

26 7) After multiple meetings, the panel on May 4, 2021,
27 unanimously agreed verbally to approve directing \$19.25 million in
28

1 settlement funds to the United Nations for Covid-19 vaccination
2 efforts in Equatorial Guinea.

3 8) I signed the panel decision prepared by Ambassador Evuna on
4 May 4, 2021. Mr. Fernandez also signed the panel decision on May 4,
5 2021. A true and correct copy of the panel decision, signed by a
6 majority of the members of the panel, is attached hereto as Ex. B.

7 9) On May 6, 2021, I met with Ambassador Evuna to discuss,
8 among other things, how best to proceed following the panel vote.
9 During this meeting Ambassador Evuna stated that Mr. Obiang Mangué
10 had not approved the panel decision and wanted to explore using
11 another entity to provide Covid-19 vaccination efforts in Equatorial
12 Guinea.

13 10) On May 14, 2021, I received an email from Ambassador Evuna,
14 also addressed to Mr. Fernandez. The email stated that Equatorial
15 Guinea would not support the panel decision to provide the United
16 Nations with \$19.25 million to provide Covid-19 vaccinations to the
17 people of Equatorial Guinea. A true and correct copy of the May 14,
18 2021 email and my response is attached as Ex. C.

19 I declare under penalty of perjury under the laws of the United
20 States of America that the foregoing is true and correct. Executed on
21 May 21, 2021 in Malabo, Republic of Equatorial Guinea.
22

23
24 
25 Susan N. Stevenson
26 United States Ambassador to the
27 Republic of Equatorial Guinea
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