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Date: January 31, 2019

ATF
Bureau of Alcohol, Tobacco, Firearms and Explosives
ATTN: Deputy Director Thomas E. Brandon
99 New York Avenue, NE
Washington, DC 20226

VIA CERTIFIED MAIL AND EMAIL TO: ATFTips@atf.gov

RE: REPORT OF ILLEGAL FIREARMS AND EXPLOSIVE PROCUREMENT, TRANSPORTATION, AND DISTRIBUTION BY IVO TANKU TAPANG FOR HIS AMBAZONIA DEFENSE FORCES ORGANIZATION AND CHRISTOPHER ANU FOBENEH FOR HIS AMBAZONIA INTERIM “GOVERNMENT” ORGANIZATION

Dear Mr. Brandon:

Our firm represents a group of dozens of families (see their website: www.cameroonvictims.org) whose parents, spouses, siblings, have been brutally murdered using firearms, ammunitions, and explosives, some of which were procured, purchased, and exported through the material and logistics support and donation from IVO TANKU TAPANG of San Jose, CA, and CHRISTOPHER ANU FOBENEH of Houston, TX.

Mr. Fobeneh engages in his criminal firearms and ammunitions purchases and exportation from, on information and belief, his residence at 3354 Rogerdale Rd Apt. 224, Houston, TX 77042-5027. Mr. Tanku does likewise from his residence at 5055 Dent Ave Apt. 97, San Jose, CA 95118-2288.

FACTS ESTABLISHING PROBABLE CAUSE AGAINST IVO TANKU TAPANG



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Mr. Tapang has publicly admitted and declared that he is the spokesperson of the Ambazonia Defense Forces “ADF” (**Exhibit “A”**), a terrorist/criminal group that has killed and terrorized our clients family members. In a public declaration posted on Facebook in Exhibit A, he notes that he raised \$21,653 USD through the website www.nchangshoeboys.org , and “18 boxes of cartridges for magazines were airdropped.....”. His post follows with pictures of the ammunition he exported for his fighters. Witnesses have noted that, using firearms and ammunition purchased and exported by Mr. Tapang, and he admitted to these purchases, **Exhibit B** (Mr. Tapang stating “we are now supplying bullets to load the guns ...”), our clients family members were killed, at varying times, in Cameroon, Africa. He has also publicly noted that he has an elite armed fighters squad named “Red Dragons”, which he controls, arms, funds, to execute his violent and terrorist murders, kidnappings, and torture. (**Exhibit “C”** regarding his affirmation of his purchases of weapons and funding for this “Red Dragons” army which news organizations like Amnesty International have noted to be committing inhuman atrocities.). On information and belief, Mr. Tapang has supplied, whether by himself or through his accomplices and co-conspirators, firearms and ammunition worth hundreds of thousands USD to his fighters in Cameroon.

We have searched the databases of licensees and firearm dealers, and we could not locate any permits associated with Mr. Tapang. We therefore believe he is in violation of all laws, federal and local, related to the purchases, exportation, licensure of firearms and explosives.

In addition, due to his status as admitted to the USA under a nonimmigrant visa, Mr. Tapang is prohibited from purchasing firearms. See 18 U.S.C. 922 (d)(5), (g)(5) and (y)(2); 27 CFR 478.11 and 478.32(a)(5). See also [18 U.S.C. 922(g) and (n); 27 CFR 478.32.

Mr. Tapang, on information and belief, given his forces also use minor or “child soldiers”, provides them with firearms and ammunition in violation of 18 U.S.C. 922(x). We have videos and will forward the links upon request showing his armies recruiting child soldiers.

FACTS ESTABLISHING PROBABLE CAUSE AGAINST CHRISTOPHER ANU FOBENEH

Mr. Fobeneh created an illegal non-profit organization, sought and obtained, Internal Revenue Service (“IRS”) tax-free benefits (501c status) in order to facilitate his fund raising activities for his criminal enterprise, a RICO criminal enterprise, which includes the procurement/purchase, importation, transportation, and delivery of firearms and explosives to his fighters in Cameroon. In



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fact, Mr. Fobeneh recently brought all the fighters whose numbers are in the thousands in Cameroon under his umbrella organization “Ambazonia Interim Government”. **Exhibit D.**

In seeking to arm his fighters, some of whom had killed our clients, and also killed about 600 innocent civilians and tortured many according to United Nations estimates, Mr. Fobeneh has violated all State and Federal laws related to firearms and explosives purchases, license requirements, transportation, exportation, and dealership. Certainly, he is in violation of, for example, The Gun Control Act (“GCA”), [18 U.S.C. 923(d), 27 CFR 478.47]

Mr. Fobeneh is also in violation of 18 U.S.C. 921(a)(17), 922(a)(1)(B) and 923(a); 27 CFR 478.11 with regards to the importation of ammunition he acquires for his armed groups. He has used his illegal purchases and importation of firearms and ammunition to further his public declared goals of “war” in Cameroon, “kidnappings,” and “hit and run attacks” which he publicly declared – his verbatim exact words - to be his strategy. **Exhibit E.**

ADDITIONAL VIOLATIONS OF FIREARMS, AMMUNITION, AND LICENSE LAWS OF BOTH IVO TANKU TAPANG AND CHRISTOPHER ANU FOBENEH

1. **Arms Export Control Act of 1976:** Firearms and ammunition must be exported in accordance with the provisions of the Arms Export Control Act of 1976. Regulations implementing this Act generally require a license to be obtained from the U.S. Department of State, Directorate of Defense Trade Controls. On information and belief, Mr. Fobeneh does not comply with this Act because he has no such permit for exporting firearms issued by the ATF, nor did he apply for such permit, as required under 22 U.S.C. 2778; 27 CFR 479.114 and 479.116.
2. **License:** Neither Mr. Fobeneh nor his 501c IRS organization (also violating IRS laws on non-profit organizations and their operations) called “Ambazonia Interim Government” have obtained a license to purchase firearms, in violation of 18 U.S.C. 923(a); 27 CFR 478.41.
3. **Machine Guns:** Mr. Fobeneh and his organization have procured machine guns in violation of 18 U.S.C. 922(o)(2); 27 CFR 479.105(e).
4. **Records:** Persons engaged in firearms purchases, import/export, sales, donation, other dispositions, are required to comply with certain record keeping requirements. 18



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U.S.C. 923(g)(1)(A); 27 CFR 478.122, 123, and 125. On information and belief, neither Mr. Fobeneh nor his organization has complied with these record keeping requirements.

5. **Nonimmigrant alien:** An alien admitted to the United States under a nonimmigrant visa is prohibited from shipping, transporting, receiving, or possessing a firearm or ammunition. 18 U.S.C. 922(g)(5)(B) and 922(y)(2); 27 CFR 478.11 and 478.32.

The numerated violations above are a non-exhaustive list of their criminal violations of firearms, ammunition, and explosives laws. My firm's investigations are ongoing.

With the foregoing in mind, on behalf of certain victims, U.S. citizens and residents of Cameroon origin, whose parents, siblings, children have been killed, maimed, tortured, body parts cut with a machete, property burnt, and for others, their children prevented from going to school for the past two years (See **Exhibit F** for sample images of what their firearms and ammunition achieve), we hereby submit this request to have Mr. TAPANG and Mr. FOBENEH thoroughly investigated because they both are, upon information and belief, committing flagrant violations of all State and Federal laws and regulations regarding the licensure, purchase, exportation, use, etc, of firearms and explosives.

We thank you in advance for your anticipated professional courtesy and cooperation.

Very truly yours,
NSAHLAI LAW FIRM

By: *Emmanuel Nsahlai*

nsahlai.e@nsahlailawfirm.com

Enclosures: Exhibits A-F (Material support sample evidence of international terrorism conducted by Christopher Anu Fobeneh)

EXHIBIT A

**(Documentary evidence showing
Mr. Tapang admitting to the
purchase and exportation of
firearms and ammunition)**



Ivo Tanku Tapang



Oct 21 at 23:46 • 🌐



ADF summary report for the week:

1. A total of \$21,653 USD was raised through www.nchangshoeboys.org
The info is public and verifiable.
2. 18 boxes of cartridges for magazines were airdropped into our zones with special classified coordinates, after a negotiated deal that cost us thousands of dollars.
3. The bullets were shared among four ADF and non-ADF general including General Knife and Satan.
4. The bullets could last a long time depending on the need.
5. The bullets are from Israel as can be clearly seen. Israel partners.
6. We instructed all non-ADF recipients that the bullets are meant to be used against La Republique ONLY. Those are our only enemies,



Write a comment...



 Publications 

national order.

4. Any citizen caught paying taxes to any La Republique official must be punished with a fine of up to 200 Amba (about 3 million FCFA) and a jail term for up to 3 days.

** Tapang Ivo Tanku, military spokesman and strategist at the office of the president of the Ambazonia Governing Authority H. E. Dr. **Ayaba Cho Lucas**



J'aime



Commenter



Partager



Ambas Bay et 56 autres personnes



Voir les commentaires précédents



Wayne Austin

Better money bro

1 h

J'aime

Répondre



Damon Bile



Votre commentaire...

5.56 MM M193
LOT: 000000

5.56 MM M193
LOT: 000000

5.56 MM M193
LOT: 000000

5.56 MM M193
LOT: 000000





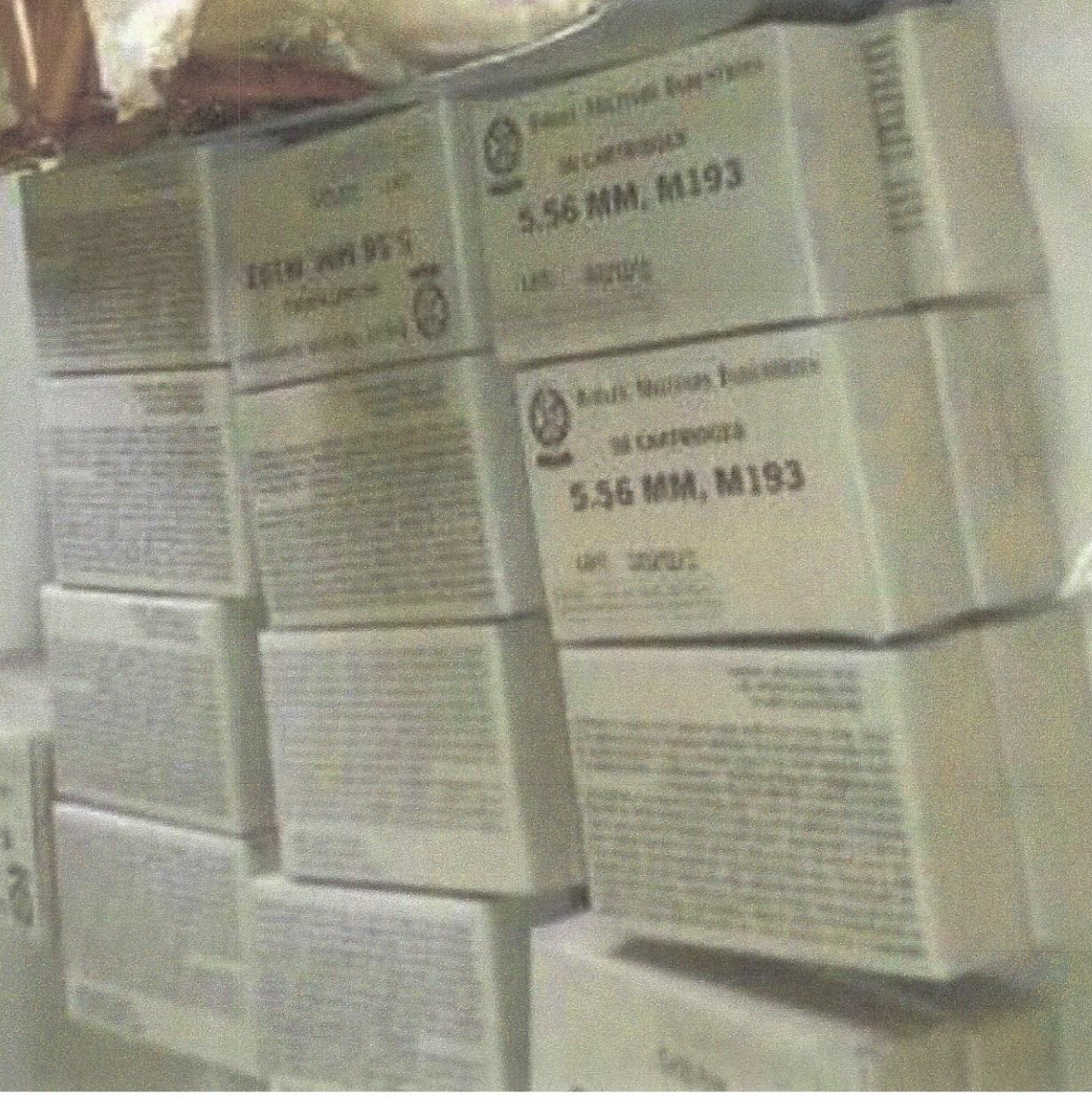


EXHIBIT B

**(Supplemental documentary
evidence regarding Mr. Tapang
admitting to the supply of firearms
and ammunition)**



Tweet



Tapang Ivo Tanku

@Tapang_Ivo

Let the world know that we are now supplying bullets to load the guns we've seized from La Republique du Cameroun terrorists called soldiers. We will kill any terrorist just to protect our women and children. Enough! I will continue funding my Red Dragons in Lebialem.

3:03 · 22 Apr 18 · [Twitter for iPhone](#)

EXHIBIT C

**(documentary evidence regarding
Mr. Tapang leadership and supply
of firearms and ammunition to Red
Dragons group)**



Tweet



Tapang Ivo Tanku

@Tapang_Ivo

I was a radical staunch Federalist. You all know that & hated me for my stance. Now, I am a radical Nationalist with no option to peace but a full-scale war. The Red Dragons, an elite squad of the Ambazonia army are under my control. When I set out to do my job, I see it through.

0:23 · 24 Apr 18 · [Twitter for iPhone](#)

30 Retweets **106** Likes

EXHIBIT D

**(documentary evidence regarding
Mr. Chris Fobeneh combining all
armed secession groups under his
organizations' leadership)**

61. June 25, 2018 - Need for a unique collaborative platform for all ground zero forces.



Chris Anu
25 June · 🌐

...

About a month ago, I made a strong case for a unique collaborative platform for all ground zero forces. Shortsighted people didn't see what I saw. They were quick to nail the idea! But they can see it now... ADF attacking SOCADEF in a full blown battle in Mator. Now, the whole village is in the bush, not because of any invading Irc terrorists, but because of the ADF. Yes, the ADF!! Can all of us now come back to our senses and INSIST on a single defense platform under the ASC? It will stop this MADNESS of group warring against another. Groups that refuse to come under the umbrella should be denied DONATIONS - as simple as that. We should stop funding loners who perhaps are all about fame and power grab. What the hell is going on in Mator, is that the "Block by Block" they promised Ambazonians?
C.ANU

👍👎🔗 121

480 comments 106 shares

EXHIBIT E

**(Documentary evidence regarding
Mr. Chris Fobeneh publicly
declaring his strategy for “war”,
“kidnappings”, and “hit and run”,
and he purchased and exported
weapons to achieve these goals)**



The Debate

Disagreeing to Agree

03/12/2018

Brother, everything you have said is on point except that I have exceptions on paragraph 2.

The people don't care about the strategy? And we should not condemn certain practices? If it were left for you and me, I absolutely won't mind what croquet tactic we employ to get to Buea. But we cannot and must not encourage groups to do so because of the dicey nature of the struggle.

Our people have never known a civil war. They have always seen it on TV. It is easy to sit afar and say let them persevere, let them fight, not until the fight gets to your neck of the woods and your neighbors start to die and then you yourself start to cave in.

This fatigue element and a drain in moral is the reason why we have to discourage right now some actions that are not well thought out before execution. The wisdom here is that we are still in the early morning of the struggle and how long we still have to go is still very cloudy.

We are not even prepared yet to keep or occupy a small territory if LRC left one and ran away. How can we then provoke or encourage a situation that kills moral before we even figure out how to contain the outcome?

I have said that hit and run and kidnappings are good strategies as far as the targets are certain institutions and very high profile individuals like SDOs and some of these recalcitrant politicians. And you know where hit and run can be most effective too? Of course, LRC territory and their economic interests.

My simple point is that while we still figuring out real and effective direction, we should very much intentionally discourage anything that will get our own very people disillusioned. It is wisdom, not weakness. Villages are easy targets for LRC terrorists. You pick up theirs in there, and they come in daylight and burn down the place. But you target say Bamenda and kidnap a person there, it's impossible for them to come back and decimate Bamenda.

We must encourage groups to pick their targets very carefully so that collateral damage is minimized while at the same time our people see us as in action. That argues well for sustainability, especially of moral among our people in ground 0

EXHIBIT F

(Sample picture, authenticated by individual victims and their families we represent, of the use of firearms by groups controlled by Mr. Tapang and Mr. Fobeneh to commit terrorism and other violence)





Yesterday in Ekona Was Come And See. The Head Of Two Tight Friends Were Cut Off By Amba Boys After The Find Out That These Two Friends Were The One Communicating With Cameroon Army To Bring Them Down, After The Incident Happend The People In Ekona Were very Scared To Stay Back Many Have Leave The Town, Some Are Saying My Home Is My Home I Better Stay And Die.

2 hrs · 🌐

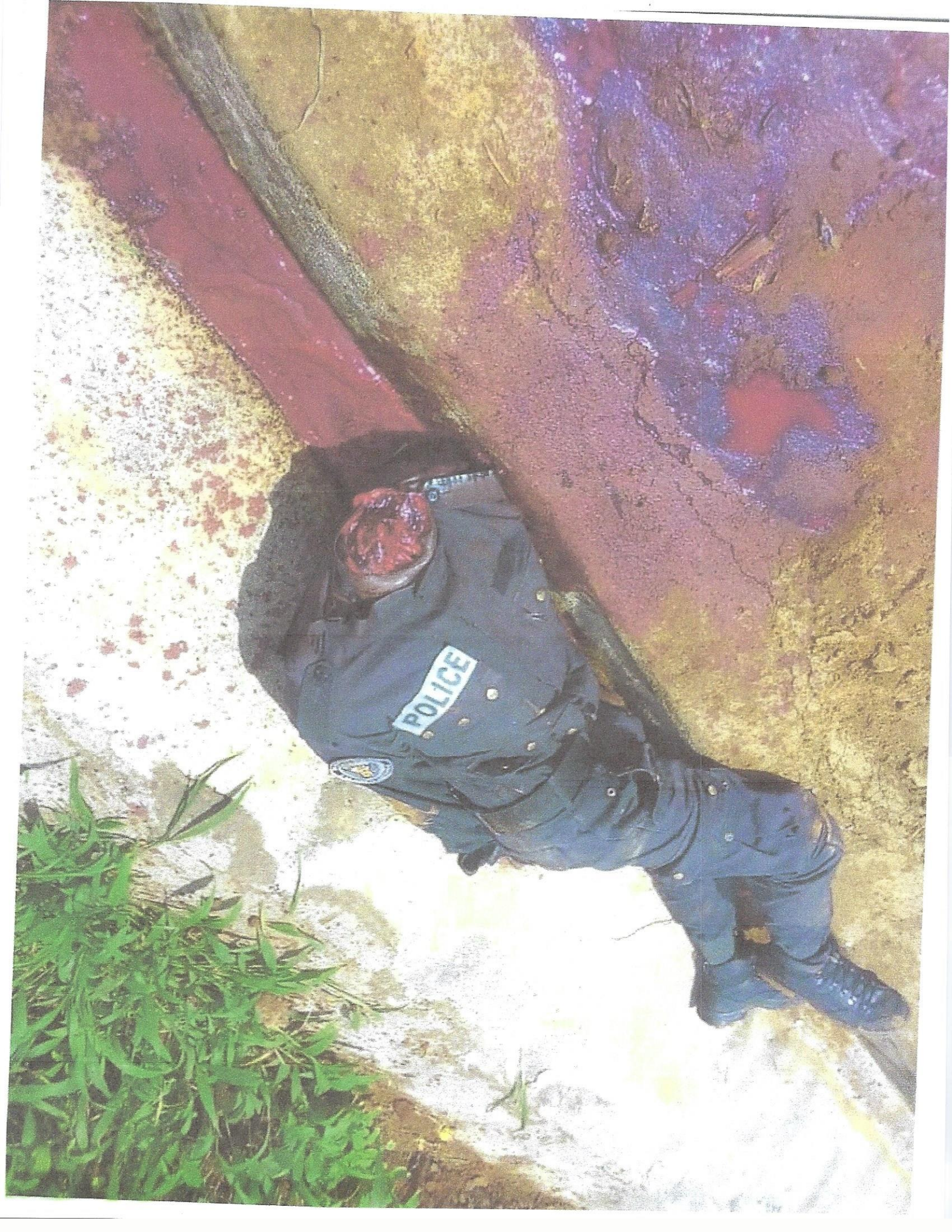


Luam Valentine is 🙄 feeling sad in Ekona.

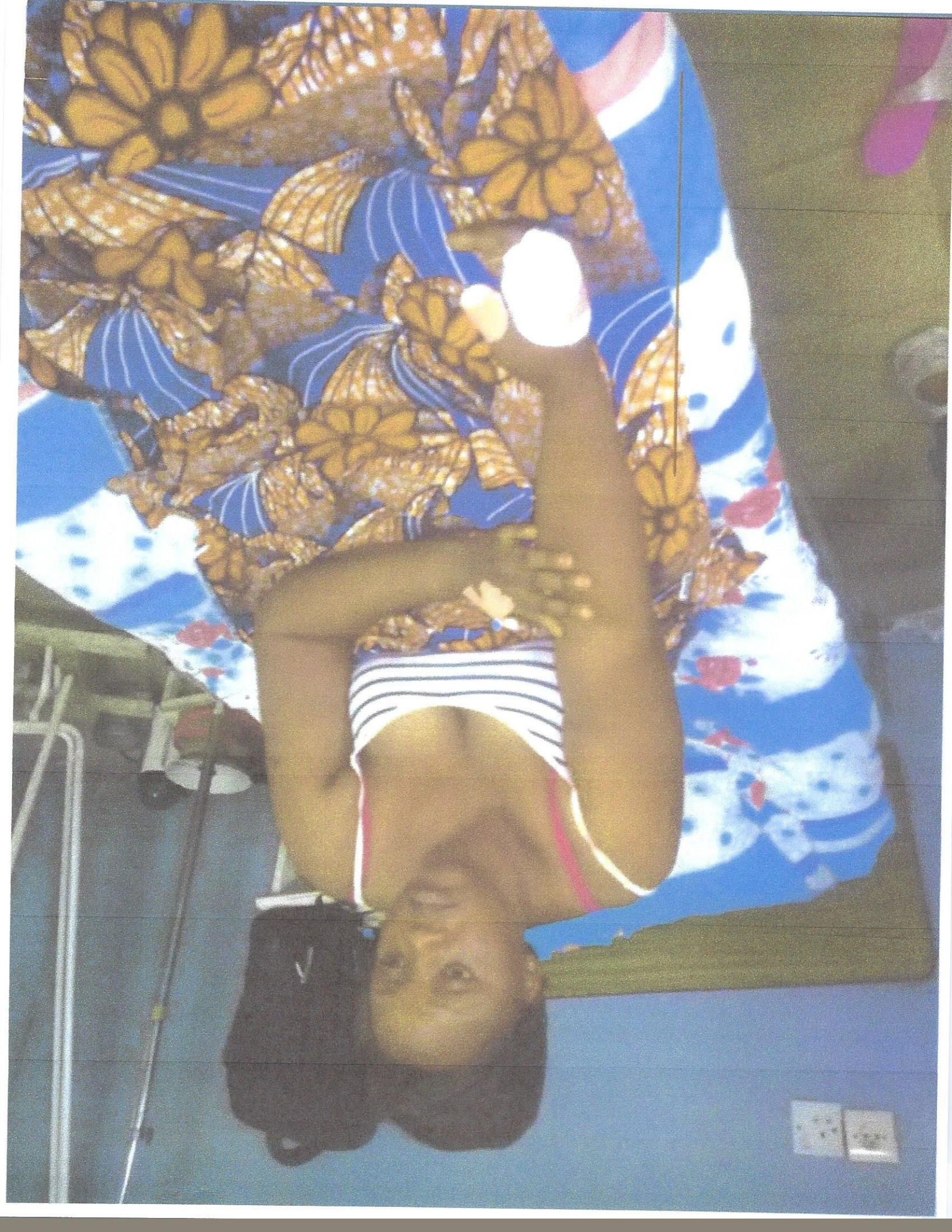
...



















Rechercher dans We Love Yo...

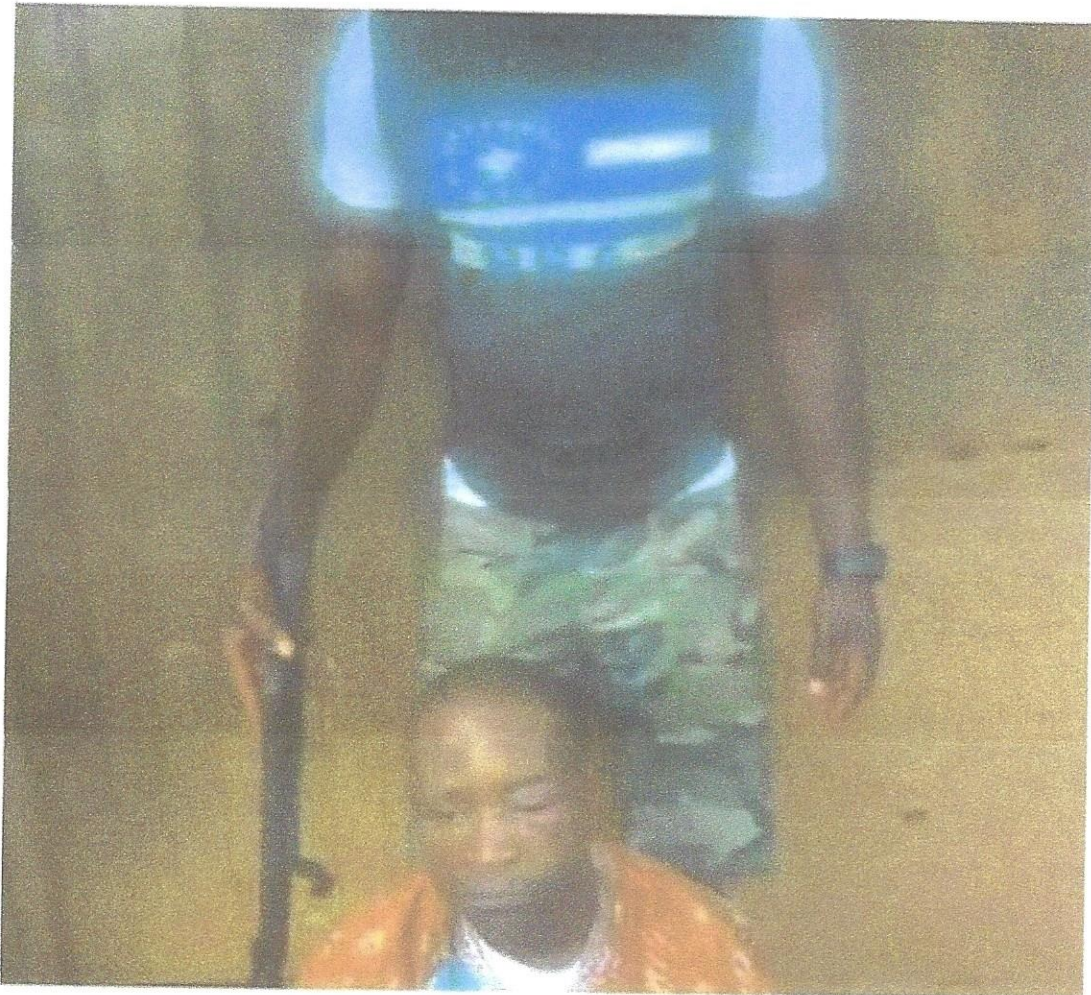


À PROPOS

DISCUSSION

WHAT PUNISHMENT CAN WE GIVE TO THIS BAMELEKE PIG WHO CAME TO AMBAZONIA JUST TO CAMPAIGN FOR PAUL BIYA

[Voir la traduction](#)



ANNULER LA DEMANDE D'ADHÉSION



← Rechercher dans les publications,...

