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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

vs

GENERAL MANUEL A. NORIEGA,

Defendant.

CASE NO: 88-79-CR-HOEVELER

**MOTION FOR INVENTORY AND
RETURN OF STOLEN PROPERTY**

FILED BY
90 FEB -2 1990
S.D. OF FLA.

COMES NOW, the Defendant, GENERAL MANUEL ANTONIO NORIEGA, by and through his undersigned counsels, hereby files this, his Motion For Inventory And Return Of Stolen Property.

Sometime after the United States armed military invasion of the Republic of Panama, on December 20, 1989, a group of United States Army soldiers unlawfully and illegally broke into and entered the personal residence of General Manuel Antonio Noriega and his office at the Comandancia. This group of soldiers was led by Lieutenant Colonel Terry Jones. These soldiers ransacked General Noriega's residence and stole numerous articles of personal property belonging to General Noriega.

United States Army Lieutenant Colonel Terry Jones and Sergeant Mark Peterson, as well as numerous other unknown and unnamed soldiers participated in this thievery.

By information and belief, this writer has learned that one Joel Peterson, brother of Sergeant Mark Peterson, is selling stolen business cards of General Noriega in Southern California.

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By information and belief, this writer states that there was a United States Army policy during operation "Just Cause" which allowed United States soldiers to steal the personal property of General Noriega, as long as they turned in drugs, or anything that the government believed would have evidentiary value in the criminal case.

Conduct of this nature, by the United States Army, is reminiscent of ancient times when **Attila the Hun** and **barbarians** sacked and burned cities and later divvied up the booty among themselves.

This conduct by members of the United States Army should be absolutely shocking to the conscious of the Court and to all decent people.

United States Magistrate, William C. Turnoff, has previously granted a defense Motion For An Inventory Of All Items Seized from General Noriega's residence, office, and other buildings within his control.

WHEREFORE, we now ask this Honorable Court to order the United States Government to provide an inventory of all items stolen by officers and enlisted men of the United States Army or any other branch of the United States military. It is further requested that this Honorable Court issue its order to the United States Government to return to General Manuel Antonio Noriega, all items stolen from his residence, the Comandancia or any other area under his control.

By the filing of this motion, General Manuel Antonio Noriega does not abandon any previously made challenges to the jurisdiction of this Court, but, in fact, preserves all such arguments.

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Respectfully submitted,
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed on this 2nd day of February, 1990, to:

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