UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Case No.: 08-61603-CIV-ALTONAGA/Brown

UNITED STATES OF AMERICA
Plaintiff,

v.

ONE 1990 Beechcraft 1900C TWIN ENGINE Twin-Turbo Prop Aircraft, Serial UC118, Venezuelan Registration No. YV219T

Defendant.
_____/

VERIFIED CLAIM OF OWNERSHIP BY INTERNATIONAL AVIATION, LLC

COMES NOW the Claimant, **International Aviation, LLC**, by and through his undersigned counsel and files this his Claim pursuant to Rule G(5), of the Supplemental Rules for Certain Admiralty or Maritime and Asset Forfeiture Claims, for the immediate return of the subject aircraft, and as grounds therefore would show:

1. The Claimant has an interest in the subject property superior to that of the United States of America. The aircraft of the present action represents the Claimants' property by virtue of its legal purchase of the same.

2. The Claimant's interests constitutes a lien and valid claim on the subject property which must be satisfied in any subsequent disposition of the subject property.

3. The Claimant asserts that the subject aircraft was not used in manner violating any federal, state or local law, and, if the aircraft was so used in this manner, it was without its actual or constructive knowledge or consent of the same. Moreover, if the aircraft was used to

commit a crime, it had no reason to believe that it would be used in such a manner.

4. The Claimant request the immediate return of the aircraft pursuant to 18 U.S.C. § 983(f) as the continued seizure of the aircraft during the pendency of the forfeiture represents an extreme hardship to the Claimant.

WHEREFORE the Claimant pray this Honorable Court will award the immediate return of the aircraft and inventory therein illegally seized by U.S. Customs and Border Protection and Drug Enforcement Administration.

Respectfully submitted,

PERCY MARTINEZ, P. A.
Attorneys for Claimants
2 Alhambra Plaza
Suite 112
Coral Gables, Florida 33134
Telephone:(305) 529-0001
Fax: (305) 448-0554

By: s/s Percy Martinez
Percy Martinez, Esq.

I HEREBY DECLARE, CERTIFY, VERIFY AND STATE, UNDER PENALTY OF PERJURY THAT THE FOREGOING FACTS ARE TRUE AND CORRECT.

Carlos Enriquez Gonzalez, Director
International Aviation, LLC, CLAIMANT

EXECUTED ON 24th OCTOBER 2008 BY CARLOS ENRIQUEZ GONZALEZ.

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BE IT KNOWN, that on this 24th day of October 2008, before me, the undersigned authority, personally appeared, **Carlos Enriquez Gonzalez** who executed the

within Verified Claim, and they acknowledged it to be true and accurate.

NOTARY PUBLIC, State of Florida at Large

My Commission Expires:

Eduardo R Guerrero
My Commission DD356152
Expires October 25, 2008