

PRESS RELEASE

For Immediate Release

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MONEY LAUNDERING & BANKRUPTCY FRAUD CONSPIRACY EXPOSED INVOLVING GEORGE SOROS'S INVISIBLE INTEREST IN CONSECO FINANCE & THE GM BUILDING

NEW YORK, NY – Law Offices of David H. Relkin, Esq. on behalf of Leslie Dick Worldwide Ltd. has filed a Federal RICO Complaint in the United States District Court for the Southern District of New York (Case No. 08-CV-7900) against George Soros, Deutsche Bank, Vornado Realty Trust, Fortress Investment Group, Donald J. Trump & 12 other RICO conspirators for \$4.2 Billion in damages.

The Complaint and Compendium may be accessed as PDF documents on the web site of the Law Offices of David H. Relkin at: www.DavidRelkinLaw.com or on PACER.

Excerpts from the 95 page RICO (Racketeering Influenced and Corrupt Organization Act) and Bid Rigging Complaint follow:

NATURE OF ACTION

The action seeks to recover damages arising out of and relating to an ongoing, global RICO Enterprise which engaged in predicate acts of a pattern of racketeering and conspiracy to commit RICO, through and by means of Money Laundering, Bankruptcy Fraud, and Bid Rigging. ¶1.

The RICO conspiracy and unlawful predicate acts of the defendants were to invest in, operate, and acquire control of various entities involved in continuing fraudulent transactions and surreptitious and conspiratorial alliances and agreements involving numerous parties whereby the Enterprise, assisted in part by conspirators, through unlawful means, including but not limited to Money Laundering, Bankruptcy Fraud, and Bid Rigging, acquired Conseco's prime assets, including Conseco Finance and the General Motors Building in New York City, and thereafter attempted to conceal their illicit activities. ¶4.

Conseco's Purchase of The General Motors Building With Donald J. Trump

In or about May 1998, Conseco and Donald J. Trump entered into a contract to purchase the General Motors Building in New York City, located at 767 Fifth Avenue between 57th and 58th Street, across the street from the Plaza Hotel. ¶49.

The unlawful Money Laundering through the sale of the General Motors Building, orchestrated and carried out by the RICO Enterprise, including George Soros, Soros Fund Management, SFM Management, Vornado Realty Trust, German American Capital, Fortress Investment Group, Donald J. Trump, and the RICO conspirators Conseco, Deutsche Bank, Lazard, Eastdil Realty, Harry Macklowe, Cerberus Capital Management, Lazard, Kirkland & Ellis, Fried, Frank, Harris, Shriver & Jacobson, Carmel Fifth and 767 Manager, and, upon information and belief, other members of the Enterprise and co-conspirators, operated through a pattern of racketeering and forms one of the cornerstones of the defendants' illicit activities of Money Laundering and Bankruptcy Fraud, predicate acts of RICO alleged herein and Bid Rigging. ¶51.

**The Documented SEC Violations
By Conseco to Inflate Its Earnings**

From March 1999 through February 2000, Conseco and its wholly-owned subsidiary Conseco Finance, made false and misleading public statements about their earnings, overstating their profits by hundreds of millions of dollars.¶62.

On or about March 10, 2004, the Securities and Exchange Commission filed civil fraud charges against Rollin S. Dick and James S. Adams for their fraudulent manipulations with respect to the interest-only securities and the fraudulent topside adjustments to the income of Conseco and Conseco Finance. (See Exhibit “H” in the accompanying Compendium of Exhibits.) ¶82.

**Gary C. Wendt Attempts
To Reduce Conseco's Debt**

On June 29, 2000, Conseco announced that it had appointed Gary C. Wendt, former CEO of GE Capital Services, to the position of CEO and Chairman of the Board of Conseco. ¶87.

**The Orchestrated Dispute
Regarding The
General Motors
Building Between Conseco
And Donald J. Trump**

Upon information and belief, this was because, at or about the beginning of March 2001, the mastermind of the RICO Enterprise, George Soros, had contacted, among others to be found in discovery, Gary C. Wendt and Donald J. Trump to contrive a Money Laundering scheme to launder money through the sale of the General Motors Building by Conseco, a co-conspirator, through a pattern of racketeering activity. ¶97.

**Behind The Scenes
Of The General Motors Dispute George Soros
And Conseco Implement The Rico Activity**

Upon information and belief, on June 7, 2002 Conseco retained Lazard to assist it with its grave financial difficulties. Lazard would later participate in the RICO conspiracy to analyze the value of Conseco Finance and provide such information to the RICO Enterprise including, Fortress Financial, to enable the RICO Enterprise to acquire and maintain an interest in Conseco's affiliate Conseco Finance. ¶163.

Upon information and belief, at or about this time, the head of the Enterprise, George Soros, or someone else acting on behalf of the Enterprise, began implementing the pattern of racketeering activities which could be accomplished by having Conseco file for Bankruptcy protection under Chapter 11 of the Bankruptcy Code, so as to acquire Conseco's assets at a discount price, including Conseco Finance and the General Motors Building and launder money through these entities. ¶164.

During secret negotiations that ensued between the members of the RICO Enterprise and its co-conspirators, George Soros, SFM Management, Soros Fund Management, Fortress Investment Group, Harry Macklowe, Vornado, Donald J. Trump, Cerberus Capital Management, the RICO Enterprise engaged in a pattern of racketeering activity involving interstate commerce to acquire an interest in Conseco, to invest proceeds of a pattern of racketeering activities in Conseco, and to conduct the affairs of Conseco through a pattern of racketeering, through Money Laundering, Bankruptcy Fraud and Bid Rigging. ¶165.

The next maneuver in the pattern of racketeering, orchestrated by Soros and the other members of the Enterprise, was to use the RICO Enterprise to ensure the sale of the General Motors Building was to the co-conspirator designee of the Enterprise, Harry Macklowe, so that Soros and the Enterprise could launder money through the rigged sale of General Motors Building. ¶167.

In addition, George Soros' and the other members of the Enterprise employed Money Laundering to purchase the General Motors Building in the name of Harry Macklowe, which laundered proceeds flowed thereafter into a real estate venture of Donald J. Trump's in Chicago, named Trump International Hotel & Tower.¹ ¶171.

¹ Among the other investors in Trump International Hotel & Tower are virtually the same defendants in this action: Deutsche Bank, AG, Blackacre Institutional Capital Management, LLC, which is the real estate affiliate of Cerberus Capital Management, LP, Grove Capital, LLP, which manages Soros Fund Management, Fortress Investment Group, LLC, which is a partner of Mapeley Holdings, Ltd., one of George Soros' companies, and George Soros. (See Exhibit "Q" in the accompanying Compendium of Exhibits.)

**George Soros And
His Pattern of Money
Laundering Activities
In Interstate Commerce**

Upon information and belief, George Soros is the Chairman of Soros Fund Management, a private investment management firm that serves as a principal advisor to the Quantum Group of Funds, based in the tax free Caribbean Country of Curaçao, a Caribbean tax haven, and a possession of the Netherlands Antilles, which protects the identity of investors from disclosure. ¶173.

Upon information and belief, the Netherland Antilles has repeatedly been cited by the Task Force on Money Laundering of the Organization for Economic Cooperation and Development as one of the world's most important centers for laundering illegal proceeds of Latin American cocaine and other drug traffic. ¶174.

In August of 1990, according to Reuters News Agency, the US Drug Enforcement Agency agents claimed that Banco de Columbia and other banks were conduits for Latin American drug money. ¶177.

In or about August 1994, according to Reuters, Soros acquired a nine percent interest in Banco de Columbia. ¶178.

According to the BBC, Soros was found guilty of felony criminal insider trading in France on January 29, 2002, and from profiting from inside knowledge of a 1998 takeover bid for Soci t  Generale, a French Bank, and was fined 2.9 Million Dollars, which felony conviction was upheld by the French Court of Appeals, the Cour de Cassation, France's highest Court, on June 14, 2006. ¶179.

**George Soros Manipulates
The Conseco Bankruptcy
To Maximize The Acquisitions
Of the RICO Enterprise
To Launder Money and
To Engage In Bid Rigging**

Upon information and belief, from June 2002 to December 2002, the six month period prior to the planned Bankruptcy filing of Conseco, the Enterprise engaged in a pattern of racketeering activity with Soros, SFM Management, Soros Fund Management, Fortress Investment Group, Cerberus, Conseco, Lazard, Kirkland & Ellis, Fried Frank Harris Shriver & Jacobson, to prepare the Conseco bankruptcy proceeding to allow George Soros and the RICO Enterprise to Launder Money through the Conseco Bankruptcy using the purchase of Conseco Finance and the Debtor in Possession Financing to gain complete control of the Bankruptcy proceeding, and ultimately allowing Soros and the Enterprise to purchase the General Motors Building, to launder money through its sale. ¶182.

Upon information and belief, the RICO Enterprise also set up FPS DIP, LLC (“FPS DIP”) to obtain the valuable position of Debtor in Possession financier to Conseco to Launder Money in the Conseco Bankruptcy. ¶190.

Upon information and belief, FPS DIP was also controlled by Fortress Investment Group and George Soros, who had been, and, upon information and belief, remain co-conspirators in Money Laundering through partnerships they maintain in Curaçao, N.A. ¶191.

The Rico Enterprise Takes Control Of The Conseco Bankruptcy

The Bankruptcy filing of Conseco was the third largest Bankruptcy proceeding, smaller only than Enron and WorldCom. ¶202.

Upon information and belief, since the members of CFN Holdings had been reviewing the assets of Conseco Finance since at least July 2002, only CFN Holdings and the RICO Enterprise, George Soros, Fortress Investment Group, Conseco and Lazard knew the true worth of Conseco Finance, which facts were never disclosed by CFN Holdings or Conseco to the third parties who attempted to bid on the purchase of Conseco Finance. ¶204.

The RICO Enterprise Commences The Flood of Motions To Take Control of The Bankruptcy of Conseco

On December 19, 2002, Conseco made an emergency motion for an Order seeking to allow FPS DIP and U.S. Bank to act as the Debtor in Possession financiers of Conseco to approve the Secured Super-Priority Debtor in Possession Credit Agreement dated December 19, 2002 between Conseco Finance and FPS DIP to obtain secured post-petition financing up to the principal amount of 125 Million from FPS DIP. ¶208.

In connection with the aforesaid motions, Conseco, by its counsel, Kirkland & Ellis, represented that it Fortress/Flowers as the potential purchaser of Conseco Finance² but that without the approval of the FPS DIP financing order, Conseco “will not be able to continue operations for more than a few days, and will not allow them to fund the completion of their restructuring process.” (See Exhibit “T” annexed to the Compendium of Exhibits.) ¶210.

² Fortress Investment Group LLC and J.C. Flowers & Co, LLC would later act through their limited liability company named “CFN Holdings LLC” in which Cerberus Capital Management, LP was also a member.

**The Illegal Acquisition of
Conseco Finance By
The Soros RICO Enterprise**

On January 13, 2003, Conseco, through its counsel, Kirkland & Ellis, responded to the objections of the Committee of Unsecured Creditors of Conseco Finance by, *inter alia*, by falsely representing that the CFN Holdings Asset Purchase Agreement was entered into “at arms’ length,” which constituted Bankruptcy Fraud. ¶224.

Since CFN Holdings had assessed the true value of Conseco Finance before the Bankruptcy, and since the Bankruptcy Court had granted CFN Holdings certain protections in connection with the purchase of Conseco Finance, only CFN Holdings had a realistic chance of acquiring Conseco Finance, on behalf of the RICO Enterprise. ¶235.

**The Machinations of Trump
And Conseco to Resolve
The Ownership of the
General Motors Building
In Furtherance
Of the RICO Enterprise**

Upon information and belief, as part of the racketeering activity engineered by the RICO Enterprise, Soros or someone else on behalf on behalf of the RICO Enterprise approached Trump with a proposal to use Bankruptcy Fraud to acquire the General Motors Building and, once acquired by the Enterprise, Soros and the other individuals associated in fact with Soros, including Trump, to engage in a Money Laundering scheme through which they could launder money through the General Motors Building sale. ¶241.

[After the dispute between Conseco and Trump was resolved by the American Arbitration Association in favor of Conseco] Despite the fact that Carmel Fifth could have entered judgment upon the Arbitration Award against Donald J. Trump which would have netted Trump approximately only 15 Million Dollars, and created a massive windfall for Conseco and Carmel Fifth, on or about June 24, 2003, in furtherance of the racketeering activity of the Enterprise, Carmel Fifth and 767 Manager and Donald J. Trump instead agreed to dismiss the state court proceeding to confirm the Arbitration Award with prejudice and entered into “a confidential agreement.” (See Exhibit “JJ” annexed to the Compendium of Exhibits.) ¶331.

Upon information and belief, the confidential agreement concerned the division of the proceeds of the sale of the General Motors Building by paying Trump 275 Million Dollars. ¶332.

This confidential agreement was in furtherance of the pattern of racketeering to launder money through the sale of the General Motors Building. ¶333.

**The Money Laundering
Is Set In Place By The Creation
Of Ephemeral Entities
And Illusory Obligations³**

During the twenty-eight days between the announcement that Macklowe had won the bidding and the closing date, Soros with the other members of the racketeering Enterprise and conspirators therewith engineered the creation of shell entities and various illusory obligations and transactions which would make it appear that Macklowe was buying the General Motors Building instead of the actual purpose of Money Laundering. ¶374.

**The Soros RICO Enterprise
Continues as Macklowe Purchases
Seven Buildings And
Uses the General Motors
Building As Collateral**

In 2007, Macklowe purchased seven office buildings from Blackstone through Eastdil Realty in New York City, upon information and belief, for approximately 7 Billion Dollars with only 50 Million Dollars of equity. ¶417.

Upon information and belief, these highly leveraged transactions were in furtherance of the RICO Enterprise to launder proceeds of a pattern of racketeering by disguising the source, origin, ownership or control of the proceeds of unlawful activity. ¶424.

According to the New York Times, George Soros has been linked to money laundering operations involving Global Telesystems, based in McLean, Virginia, doing business in Russia. “Federal Investigators, who thought they had a possible case of money laundering, were dismayed. The case was not aggressively pursued, said one senior law enforcement official. An investigator from another Federal Agency said that the case had been prematurely closed.” (See Exhibit “OO” annexed to the Compendium of Exhibits.) ¶425

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³ A chart of these activities is annexed hereto as Exhibit “LL” annexed to the Compendium of Exhibits.