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ASST. CLERK OF COURTS
REPUBLIC OF MARSHALL ISLANDS

**IN THE HIGH COURT
OF THE
REPUBLIC OF THE MARSHALL ISLANDS**

Eigigu Holdings Corporation

Plaintiff,

v.

**Leander Leander and Lijun
Leander**

Defendants.


Civil Action No.: 2014-067

**PLAINTIFF'S FILING OF
AFFIDAVIT**

COMES NOW the plaintiff by and through counsel Gordon C. Benjamin and hereby files the attached May 26, 2014 Affidavit of James Keppa and Jamaica Adeang in this matter, as evidence that illegal activities are occurring in the areas of the Eastern Gateway Hotel that were leased by the Defendants.


So submitted,

Date: November 6, 2014


Gordon C. Benjamin, Plaintiff's Attorney

Certificate of Service

I, Gordon C. Benjamin, counsel to Plaintiff, do hereby certify that I emailed a copy of this **“PLAINTIFF’S FILING OF AFFIDAVIT”** to Defendants’ counsel, Mr. Russell Kun, Chief Public Defender, at his email address **“rkun2405@gmail.com”** on November 6, 2014.



Gordon C. Benjamin, Plaintiff’s Attorney

AFFIDAVIT

We, James Keppa and Jamaica Adeang, do solemnly declare and affirm under the penalties of perjury that the matters and facts set forth below are true to the best of our knowledge, information and belief:

Regarding the matter of a visit to the Eastern Gateway Hotel on Wednesday May 21, 2014:

1. We, Jamaica Adeang born on December 7, 1992 and James born on December 2, 1988, are adults, citizens of the Republic of Nauru, visiting Majuro;
2. A relative of ours, who we know is a Director of Eigigu Holdings Corporation, the leaseholder of the Eastern Gateway Hotel area in Majuro asked us to find out if there was any prostitution going on at the Eastern Gateway Hotel;
3. So on Wednesday May 21, 2014 at about 7:30pm, our Nauruan friend, Mr. Sankey Amram, who is an observer on a fishing boat, who was staying at the RRE Hotel called a taxi driver who came and picked us up, including Mr. Sankey Amram;
4. Our friend, Mr. Sankey Amram, asked the taxi driver to take us, James Keppa and Jamaica Adeang, to anywhere where we can find Chinese prostitute girls, and the taxi driver said he knows a place, and he drove us, including Mr. Sankey Amram, to the Eastern Gateway Hotel;
5. The taxi driver first pulled into a parking lot at the Eastern Gateway Hotel where there was a big store with "AA" in the name, and the taxi driver exited the taxi and he went into one of the stores and talked to someone, but we could not see who he talked to;
6. The taxi driver then got back into the taxi and drove us over to an adjacent parking lot at the Eastern Gateway Hotel, where we could see a business on the ground floor marked with a big "Z Brothers" or similar markings;
7. The taxi driver parked and he and we, James Keppa and Jamaica Adeang, got out of the taxi and the taxi driver asked some people some questions in his native language and then he just motioned for us to follow him, and we three, the taxi driver and James Keppa and Jamaica Adeang, walked up some stairs in the corner of the building up to the second floor;
8. Our friend, Mr. Sankey Amram, remained in the taxi;

9. On the second floor we saw a young woman, who looked ethnically Marshallese to us, and the taxi driver asked her if there were any Chinese girls available for us;
10. The Marshallese woman asked us to follow her and she led us down the hall to a door painted pink and she knocked on the door and someone opened the door and let her into that room and closed the door, but we could not see who the person was that opened the door because we were standing at an angle that prevented our sight;
11. While standing outside the room we could see an open doorway not far from where we were standing and there was loud music coming from the other side, which sounded like someone trying to sing karaoke;
12. The Marshallese woman came out of the room after a short while and shut the door behind her and then told us it was okay for us to go through the doorway close to the room where she had just exited.
13. We went through the doorway and we saw a bar counter on the right side and behind the bar counter was what looked like a Chinese woman, maybe in her late 30s or early 40s, in regular clothes, and about seven Marshallese, or who looked like Marshallese, young girls maybe in their late teens to early 20s;
14. Further to the right in the bar we could see the room where someone was still singing karaoke rather loudly, and we saw an older man, Chinese-looking, sitting at a chair in the bar;
15. I, James Keppa, asked the Chinese lady if there were any girls available for sexual favors and the Chinese lady asked us where we were from. I, James Keppa, told the Chinese lady that I was from Tuvalu, and my friend, Jamaica Adeang was from Kiribati. One Marshallese girl responded with “Maori” which is “hello” in the Kiribati language, and I, James Keppa, responded “Maori”;
16. The Chinese lady told us to go have a seat, so we sat at a low table that had some chairs around it and we ordered two Bud Light beers;
17. A local girl, one of the seven that we had seen behind the bar, brought the beers over to us and I, James Keppa, asked her name, and she responded something that sounded like “Selmina”. I, James Keppa, introduced myself to Selmina, but I did not introduce Jamaica, and Selmina went back to the bar counter area;
18. I, James Keppa, then got up and walked to the Chinese lady behind the bar and asked her if she had any cigarettes for sale and the Chinese lady told me to have a

- seat and she'll bring the cigarettes. After I sat down then Selmina brought over a pack of cigarettes, "USA" brand;
19. When Selmina brought over the cigarettes, and after some light conversation, I, James Keppa, asked Selmina if I can buy any of the girls for sex, and Selmina said yes and asked us to wait and she walked back to the bar counter area;
 20. Selmina returned with another local girl who was introduced as what sounded like "Mimi" and Mimi sat across from Jamaica Adeang and Selmina sat down next to James Keppa. Then a third local girl, who introduced herself as "Kimberly" came over and sat down at our table;
 21. I, James Keppa, then ordered three beers for the three girls, Selmina, Mimi, and Kimberly, who began drinking the beer;
 22. At that time we noticed a Chinese-looking man, maybe in his 30s and two younger Chinese-looking males come into the bar and stand behind Jamaica Adeang and just looked at both of us for about a minute, and then all three of those Chinese-looking males left the bar;
 23. I, James Keppa, then told the three girls that Jamaica and I had a cousin who was getting married so we were having our own little bachelor party by coming up there looking for sex with some girls;
 24. We chatted for about three to our minutes, and one of the things the girls told us was that no local Marshallese were allowed in the bar. Their clients normally consisted of Chinese seamen, and other nationalities.
 25. Then I, James Keppa, asked Selmina how much would it cost for sex with the girls, and Selmina told me to go ask the Chinese lady at the bar;
 26. I, James Keppa, waited a little while before approaching the Chinese lady because she was chatting with three of the Marshallese girls behind the bar, and when the Chinese lady looked like she had stopped her conversation with the three local girls, I asked Selmina if I could go and chat with the Chinese lady and Selmina said yes;
 27. I, James Keppa, then got up and walked to the Chinese lady and asked her if she had any Chinese girls available for sex and she pointed back toward the hallway and said that someone else handles the Chinese girls;
 28. So I, James Keppa, then asked the Chinese lady if she had any local girls available for sex and she said yes;

29. The Chinese lady asked me, James Keppa, how long we wanted the girls for, and I responded that we wanted them for one night;
30. I, James Keppa, asked the Chinese lady for three girls and the Chinese lady asked why three when there was only two of us, so I told her that we were going to go pick up my cousin;
31. So the Chinese lady said OK, how about the three girls who were sitting at our table, and I said OK, but also can we have the young girl sitting beside the Chinese lady at the bar as a fourth girl. The Chinese lady said OK and then turned and talked to the fourth girl and then turned back to me and said the fourth girl is not available because she has her period;
32. The Chinese lady asked me, James Keppa, where we wanted to take the girls, and I asked her if she had any rooms there, and the Chinese lady said she had rooms there where we can go and have sex but we had to leave by 7:30 in the morning;
33. I, James Keppa, then asked how much does it cost for the girls, and the Chinese lady responded that she will charge us sixty dollars per night for the girl and the room, but it is up to us to help the girl if the girl "helps" us;
34. I, James Keppa, then asked the Chinese lady if the sixty dollars included the room, and the Chinese lady said yes that the sixty dollars included the room;
35. I, James Keppa, told the Chinese lady that we will come back with our cousin and the Chinese lady said OK, but when we come back each of the three of us can choose which girl we wanted
36. I, James Keppa, then I pulled out some money to pay for the beers and the pack of cigarettes and fanned the two one hundred dollar bills and a fifty dollar bills so that the Chinese lady could see I had money;
37. I, James Keppa, asked how much was the bill for the five beers and the pack of cigarettes and the Chinese lady said the total was \$19, so I gave her the \$50 bill and told her to use the change to buy beers for the girls;
38. Then we walked out of the bar. As we walked away, the fourth girl, who supposedly was having her period said to us something like "hey make sure you come back, I love you"
39. We walked down the hallway and down the stairs and out into the parking lot and met the Director of Eigigu in front of the M&K Store on the Eastern Gateway Hotel

Affidavit of James Keppa and Jamaica Adeang

premises, and he drove us back to the RRE Hotel room occupied by our friend, Mr. Sankey Amram, where we then discussed the night's events, with no intention of returning to that bar.

Further these Affiants saith not.

Affiants, Mr. James Keppa and Mr. Jamaica Adeang, having been sworn, affirm under oath that the above is true and correct. Done this 26th day of May, 2014.

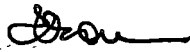


James Keppa



Jamaica Adeang

This affidavit, by both individuals signing above, was subscribed and sworn to before me on this 26th day of May, 2014.



Notary Public

