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Date: 01/09/19

**U.S. Immigration and Customs Enforcement
Homeland Security Investigation**

SAC San Francisco
630 Sansome Street Room 890
San Francisco, CA, 94111

Phone: (415) 844-5455
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VIA CERTIFIED MAIL AND FASCIMILE

**RE: REPORT OF POSSIBLE IMMIGRATION AND FEDERAL CRIMES –
INCLUDING VIOLATIONS OF TERRORISM LAWS – AGAINST IVO
TANKU TAPANG, AND REQUEST FOR AN INVESTIGATION.**

Date of Incident: October 2016 to present.

Dear ICE:

We present to you a matter involving U.S. national security, terrorism, immigration law violations, and violent crimes. The United States is **not** a safe harbor for natives of foreign countries, such as the person reported IVO TANKU TAPANG, to engage in material support of terrorism, international terrorism, aiding and abetting in a long list of federal crimes, that occur in Cameroon, but pose an existential threat to tens of thousands of US citizens of Cameroon origin, and US citizens generally. A terrorist harboring in our midst is a most dangerous proposition, and such a possible scenario must be investigated comprehensively. On information and belief, MR. IVO TANKU TAPANG is in violation of all immigration laws regarding violent crimes and terrorist acts or support of same, against intending immigrants, or even naturalized citizens, and he along with all those residing in the



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USA who act in agency, joint venture, conspiracy, with him must be investigated and brought to justice.

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, we hereby submit this tip/report/complaint against **IVO TANKU TAPANG** who, upon information and belief, is committing multiple terrorism and other federal crimes from his residence in San Jose, California, listed below:

A. VIOLATIONS

On information and belief, Mr. Tapang has committed the following violations, without limitation:

1. “International terrorism,” according to 18 U.S.C. § 2331 is defined as “activities that involve acts or acts dangerous to human life that are in violation of the criminal laws of the United States or of any State, that would be a criminal violation if committed within the jurisdiction of the United States or of any State.”
2. 18 U.S.C. §2(a) — Aiding, abetting, counseling, commanding, inducing or procuring a federal crime;
3. 18 U.S.C. §371 — Conspiring to commit a federal crime;
4. 18 U.S.C. §2332b — Conspiring to commit an act of terrorism;
5. 18 U.S.C. §2339A - Providing material support to terrorists;
6. 18 U.S.C. §2339C - Prohibitions against the financing of terrorism;
7. CA Penal Code §31 — Accomplice liability – Aiding and Abetting Law;
8. CA Penal Code §182 - Criminal Conspiracy (to crimes of murder, kidnappings, arson, assault, battery, without limitation)
9. CA Penal Code §32 – Accessory after the fact ((to crimes of murder, kidnappings, arson, assault, battery, without limitation)
10. Other crimes, including accessory before the fact, murder, kidnapping, arson, robbery, assault and battery, and seeking the overthrow of a foreign government through the use of force and war in violation of 18 U.S.C. §2385.

B. FACTS ESTABLISHING PROBABLE CAUSE



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We have attached as **Exhibit A** a chart comprising captions and video links of conduct and actions of Mr. Tapang, where he admits being the spokesperson of the Ambazonia Defense Forces (“ADF”), and engages in conduct and actions constituting “material support” (as defined by the Supreme Court of the United States, “ material support” means providing “training”, “expert advice or assistance”, “service” or “personnel” to armed organizations) of terrorism that harms parents, siblings, children and other families of US citizens of Cameroon origin. Mr. Tapang, as evidenced in these videos, provides “expert advise” “service” “training” and “personnel” to the ADF on how to intimidate civilians into submission, carry out killings, terrorize innocent civilians in hotels and students in dormitories in the French speaking regions of Cameroon, burn down houses of those who do not cooperate and other atrocities. The videos are indisputable evidence, with Mr. Tapang personally bragging and boasting of his criminal actions and accomplishment, and giving direct orders to his ADF fighters and followers.

Mr. Tapang is the official spokesperson of the ADF. We have attached as **Exhibit B** certain documentary evidence as well as videos which illustrate the killings, torturing, destruction of property, arson, maiming, cutting hands of government workers and students, destruction of roads, and other actions that the ADF has engaged in, meeting the definition of terrorism and criminality. Mr. Tapang has aided and abetted the ADF in all these acts, by advising them on what actions to take, providing them with fund raising activities and financial support, providing them with a platform to air their views and propaganda via his facebook page, providing them with personnel, both administrative and fighters, to execute their missions. The brutal actions and atrocities committed by the ADF are well documented by credible news organizations such as the BBC, RFI, Reuters, Amnesty International. Attached as Exhibit B to this report is selected links to documentary videos and evidence of the terrorist and criminal acts of the ADF.

Additional specific material support of crimes, terrorism, and aiding and abetting in a long laundry list of federal crimes which, upon information and belief, is committed by Mr. Tapang includes:

1. Fund raising for the ADF and related armed militia organizations whose official conduct and policies are all crimes under USA laws
2. Using his facebook posts to provide instructions on strategy, policy, and ADF regulations



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3. Recruiting of fighters
4. Assistance with procuring and providing weapons, equipment, and other tangible materials.
5. Coordination with other separatists groups abroad and in Cameroon
6. Leadership of the ADF in the USA
7. Expert advise and assistance on how to obtain separation by violence and force and war from Cameroon
8. Assistance with the training of ADF fighters
9. Using other social media such as email, twitter, skype, whatsapp to promote ADF violent agenda, plan the dates and times of attacks, and other activities in violation of USA laws.
10. Intimidation, threats, and killings of anyone who opposes their goal of secession; and so on and forth.

C. SUFFERINGS OF THOUSANDS OF US CITIZENS OF CAMEROON ORIGIN BECAUSE OF THE ACTIONS OF MR. TAPANG AND ADF

According to most reputable organizations such as Amnesty International, Human Rights Watch, or the International Crisis Groups, it is estimated as of December 2017 that the conflict in Cameroon – which we report as being directly caused, incited, participated, materially supported by the actions of Mr. Tapang and his ADF, acting in a joint venture, aiding and abetting each other, acting in agency - has resulted in 500 civilians who have died in the violence, and the United Nations counts 30,000 Cameroon Anglophone refugees in Nigeria and 437,000 internally displaced in Cameroon. An incredible half a million Cameroonians are suffering a life of abject misery, poverty, and nastiness, away from their homes, due to the actions and conduct of Mr. Tapang, and his ADF and related organizations.

The United States citizens victims we represent, as well as thousands of US citizens of Cameroon origin residing in the USA, wake up each morning, checking their phones, their whatsapp messages, and fearing the worst, always likely to happen: families and friends kidnapped for ransom, silenced into submission with threats on their persons and lives, killings of family members, and other atrocities. Without the material support Tapang provides to the ADF, and readily admits and boasts about it on his social media platform (see exhibits attached), resulting in the verifiable massacres noted and documented by reputable organizations such as



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Amnesty International, US citizens of Cameroon origin would not have this daily anguish, pain, and feeling terrorized and helpless.

As recent as January 8, 2019, Mr. Tapang, in an overt defiance of the laws of the United States, the legislature, its agencies, admitted on his Facebook page about being “an advisor/expert ...” in his material support of violent acts and terrorism, thus, once again, and as demonstrated in the attached exhibits, meeting without a reasonable doubts the standards required for criminal prosecution for his material support of terrorism, violent acts, and high crimes.

It is against this backdrop that **we humbly request an investigation into the actions and conduct of Mr. Tapang which we believe constitutes material support of terrorism, as well as a long laundry list of immigration and federal crimes**, partially listed above, which he commits from his residence in San Jose, California, and causing unimaginable pain to thousands of US citizens of Cameroon origin, as well as anguish and sufferings to millions of Cameroonians.

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

Very truly yours,

Nsahlai Law Firm

Emmanuel Nsahlai

By: _____
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