

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Africa Growth Corporation,)	
)	
Plaintiff,)	
)	
v.)	Case No: 17-cv-2469
)	
Republic of Angola, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**DECLARATION OF JOAO FERREIRA IN SUPPORT OF PLAINTIFF'S MOTION FOR
A DEFAULT JUDGMENT AGAINST DEFENDANTS**

Under penalties of perjury, pursuant to 28 U.S.C. § 1746, and being duly authorized, I, JOAO FERREIRA, declare as follows:

1. I am a citizen and resident of Portugal. Beginning in May 2016, I became the Finance Manager of the Angolan-based subsidiaries, Illico Lda. ("Illico"), AGPV Lda ("AGPV") and Maximilio Lda ("Maximilio") (collectively, the "AFGC Angolan Subsidiaries"), which are wholly owned by Africa Growth Corporation and its predecessor company (referred to herein collectively as "AFGC"). Prior to May 2016, and beginning in January 2015, I was based in Angola as the senior accountant employed by PwC to supervise account management and preparation for the AFGC Angolan Subsidiaries, among other clients.

2. I was compelled to leave Angola in July 2017 out of fear for my personal safety because of a pattern of intimidation and threats directed at me, as a representative of the AFGC Angolan Subsidiaries, by Defendant Angolan General Antonio Francisco Andrade ("General Antonio Andrade") and as supported by other Defendants in this case.

3. Since being forced to leave Angola, I have been employed by AFGC as its Africa Finance Manager, where AFGC is currently focused on building and financing affordable housing for low- and middle-income families across Sub-Saharan Africa.

4. In January 2015, AFGC, through its wholly owned, Angolan-based subsidiaries, acquired two residential real estate properties, consisting of three buildings (named “Isha 1”, “Isha 2” and “Pina”) that were divided into 64 apartments and 7 offices, in Luanda, Angola.

5. Following the acquisition of Isha 1, Isha 2 and Pina, AFGC began the construction of a fourth building (named “Isha 2.5”), which contained another 40 apartments. Isha 1, Isha 2, Isha 2.5 and Pina are collectively referred to hereinafter as the “AFGC Assets.”

6. From January 2015 onward, the AFGC Angolan Subsidiaries succeeded in developing and improving the AFGC Assets and renting apartment units and offices to Angolan residents and the employees of foreign companies and foreign diplomats residing and working in Luanda, Angola. All rental incomes were deposited into AFGC’s Angolan Subsidiaries’ local bank accounts.

7. Defendants Angolan General Antonio Francisco Andrade (“General Antonio Andrade”), Angolan Army Captain Miguel Kenehele Andrade (“Captain Miguel Andrade”), and Angolan State Prosecutor Natasha Sulaia e Santos Andrade Santos (“Angolan State Prosecutor Natasha Santos”), (collectively referred to herein as the “Angolan Government Agents”), as well as defendants General Francisco Higinio Lopes Carneiro, in his official capacity as Governor of the Province of Luanda, Angola (“General Carneiro”); Angolan General Joao Maria de Sousa, in his official capacity as Attorney General of the Republic of Angola (“General de Sousa”) and the Republic of Angola (“Angola”) (all collectively referred to in the Complaint as “Defendants”), all have no lawful title to, legal ownership interest in or lawful corporate position in AFGC, any of its Angolan-based subsidiaries, or the AFGC Assets.

8. In June 2017, I learned of the unlawful appointment of General Antonio Andrade as the director and Gerente (General Manager) of Illico, which had been achieved through forgery and fraudulent means, when Illico's lawful representative was subsequently blocked from making bank transfers to and from the Illico accounts.

9. Once fraudulently inserting himself as an Illico director, General Antonio Andrade, using his official title and power, unlawfully assumed control over the Illico bank account. On several occasions, General Antonio Andrade had attempted to illicitly transfer money from Illico bank accounts (including, but not limited to, accounts held in Banco de Fomento Angola, one of the largest Angolan private banks) by instructing and authorizing payments be made to his privately-owned companies, among them Vitagest Lda.

10. During this time, in June 2017, General Antonio Andrade also used forged documents and stole from AFGC by fraudulently withdrawing money from the Illico bank accounts for his personal use. In addition, the Angolan Government Agents stole a sizable building generator and equipment from the AFGC Assets valued in excess of \$250,000.00.

11. Beginning in June 2017, the Angolan Government Agents began using their official positions within the Angolan government to threaten and intimidate me and other employees of the AFGC Angolan Subsidiaries. Specifically, General Antonio Andrade demanded that we recognize him as the owner and manager of the AFGC Assets and also demanded that I and the local staff cut off all contact with AFGC senior management outside Angola going forward.

12. General Antonio Andrade also scheduled a meeting with me and the local AFGC staff, during which meeting an external consultant for AFGC whom General Antonio Andrade had threatened was so traumatized that she subsequently abandoned both her office and apartment located within the AFGC Assets.

13. Beginning in June 2017, one or more of the Angolan Government Agents made repeated visits to the AFGC Assets. Specifically, General Antonio Andrade relied on his official government title and used the power of this official position, force and threats to let the local AFGC staff know that they must either follow his instructions or suffer the consequences.

14. Beginning in June 2017, one or more of the Angolan Government Agents used fraud and the threat of force to unlawfully seize local AFGC management and falsely represent themselves to tenants and others as the lawful owners and managers of the AFGC Assets.

15. Beginning in June 2017, the Angolan Government Agents were demanding that the tenants at the AFGC Assets cease all communications with AFGC, renege on their current lease obligations, and direct all future rental payments to a corporate account established by the Angolan Government Agents.

16. Beginning in June 2017, one or more of the Angolan Government Agents attempted to sell off individual apartments that are part of the AFGC Assets to unsuspecting third-party buyers in Angola in an effort to take the sale proceeds for their own benefit.

17. As part of the Angolan Government Agents' efforts to unlawfully sell individual apartments, I was ordered by General Antonio Andrade to prepare documentation to support the sale. Despite clear and overt intimidation and threats to comply, I was able to briefly delay taking any action until my decision not to comply made me feel unsafe remaining in Angola.

I declare and have executed this Declaration under penalty of perjury under the laws of the United States of America, 28 U.S.C. § 1746, this 05 day of March 2018, that the foregoing is true and correct.

JOAO FERREIRA
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