

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 19-CR-20693-SEITZ

UNITED STATES OF AMERICA

Plaintiff

vs.

PETER SOTIS, et.al,

Defendants

RAMAS LLC,

Petitioner.

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**RAMAS LLC'S PETITION FOR ANCILLARY HEARING**

Ramas LLC, Petitioner herein, and owner of the rebreathers that are the subject of this Court's Preliminary Order of Forfeiture (DE-114) respectfully files its ancillary petition claiming the rebreathers pursuant to Rule 32.2, Fed. R. Crim. P. and 21 U.S.C. Sec. 853(n). In support of this Petition the Ramas LLC states the following:

1. Ramas LLC purchased from Add Helium and paid for the 4 rebreathers that are the subject of this Court's preliminary order of forfeiture. Ramas LLC is the legal owner thereof.
2. This Court granted the parties' joint motion to extend the deadline within which Ramas LLC was to file its ancillary petition to March 30, 2022. (DE-167, 169).

3. Ramas LLC (“Ramas”) is a small, two employee export company based in Virginia. It is the owner of the seized rebreathers, used for diving, which were purchased from Add Helium. The rebreathers were seized while being shipped overseas pursuant to Ramas’ instructions in an export transaction. The rebreathers were but one item out of an export shipment that contained hundreds of items, not requiring a license. Title to the rebreathers was still in Ramas as they were never delivered to Ramas’ customer and Ramas paid the supplier, Add Helium, for the rebreathers. Attached as Exhibit A are commercial invoices from Ramas establishing that it had an ownership and possessory interest in the rebreathers at the time of seizure.
4. Ramas LLC requests that the Court grant it a hearing to adjudicate the validity of its interest in the rebreathers pursuant to 21 U.S.C. Sec. 853(n)(2).

Dated: March 30, 2022.

Respectfully Submitted,

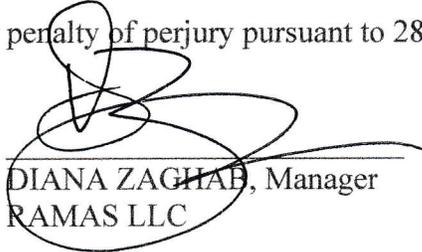
FOR RAMAS LLC

**BECERRA LAW, P.A.**

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I declare that the foregoing is true and correct under penalty of perjury pursuant to 28 U.S.C. Sec. 1746.

Dated: March 30, 2022

  
DIANA ZAGHAB, Manager  
RAMAS LLC