



U.S. Department
of Transportation
**Federal Aviation
Administration**

Mike Monroney
Aeronautical Center

695GJ
P.O. Box 25082
Oklahoma City, Oklahoma 73125

August 7, 2012

J. Robert Kalsu, Esq.
Crowe & Dunlevy, P.C.
20 North Broadway, Suite 1800
Oklahoma City, OK 73102

Dear Mr. Kalsu,

Re: Civil Aircraft N695GJ, Manf. Ser. No. 96011

This responds to your request of July 31, 2012, for review of the following documents;

- 1) Declaration of Forfeiture, dated June 20, 1986, by the Asset Forfeiture Unit of the Drug Enforcement Administration identifying a Gulfstream Air Commander, Manf. Ser. Number 96011,
- 2) Copy of 19 U.S.C. § 1906, and
- 3) Copy of Default Judgment dated December 20, 1987, from U.S. District Court, Middle District of Pennsylvania, forfeiting property to the United States.

We understand that the Aircraft was subject to an unreleased and recorded lien (Conveyance No. H34766) in favor of Algemene Band Nederland N.V. , now ABN Amro Bank NV at the time the Aircraft was forfeited.

In view of the above, our opinion is requested as to whether a release of Conveyance No. H34766 will be required by the FAA Aircraft Registry in order to deregister the Aircraft if all other criteria to deregister the Aircraft has been met.

Based on our review of the Declaration of Forfeiture, the Aircraft is identified by Manufacturer, model and by serial number. The Declaration does not specifically identify any particular lien or indicate that the Aircraft is free and clear of all liens. However, the Declaration recites that "it is hereby declared that such property has been forfeited to the United States under 19 U.S.C. 1609." Section 1609(b) provides that:

Title shall be deemed to vest in the United States free and clear of any liens' or encumbrances ... from the date of the act for which the forfeiture was incurred. Officials of the various States, insular possessions, territories, and commonwealths of the United States shall, upon application of the appropriate customs officer accompanied by a certified copy of the declaration of forfeiture , remove any recorded liens or encumbrances which apply to such property and issue or reissue the necessary certificates of title, registration

certificates, or similar documents to the United States or to any transferee of the United States.

Accordingly, in reliance on the identification of the Aircraft in the Declaration, the statement in the Declaration that property was forfeited under 19 U.S.C. 1609 and discussions with a representative of the FAA Aircraft Registry, it is our opinion that a release of lien will not be necessary in order to release Conveyance H34766 and deregister Aircraft N695GJ. Assuming all other requirements for deregistration have been met, N695GJ will be deregistered from the U.S. Registry upon filing the Declaration of Forfeiture with a copy of this opinion.

Sincerely,

Joseph R. Standell
Aeronautical Center Counsel

By:


James M. Webster