

**UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK**

**GOLDSILVER, LLC, Interpleader Plaintiff, v. AMY JO SANGER and IAIN CLIFFORD  
a/k/a IAIN CLIFFORD STAMP, Interpleader Defendants.**

**Case No. 1:25-cv-08704-NRB**

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**DEFENDANT IAIN CLIFFORD'S STATUS REPORT AND NOTICE OF SUPPLEMENTAL  
AUTHORITY REGARDING CHAIN OF TITLE**

**March 27th, 2026**

**Hon. Naomi Reice Buchwald United States District Judge, Southern District of New York 500 Pearl  
Street, New York, NY 10007**

Dear Judge Buchwald:

I appear *pro se* in the above-captioned interpleader matter. I respectfully submit this combined Status Report and Notice of Supplemental Authority to establish a procedural timeline and clarify the narrow legal issues that distinguish the *res* from peripheral matters.

**I. Operational Hardship and Request for Scheduling Order** This matter was initiated in October 2025, and my original Letter Motion for Referral to Mediation has been pending since November 15, 2025. I must emphasize that the approximately **\$900,000** in dispute is vital operating capital for my Indonesian administrative firm, PT. ICS Remedy Consulting. My company is currently suffering significant operational hardship due to the continued deprivation of this capital. I respectfully request that the Court issue a Scheduling Order to break the current impasse and prevent further irreparable harm.

**II. Supplemental Authority Regarding Chain of Title** To assist the Court in evaluating the competing claims, I provide the following clarifications regarding the origin and ownership of the funds:

- **Indonesian Origin of Corporate Capital:** The funds in dispute originated directly from PT. ICS Remedy Consulting (Indonesia), in which I hold a 99% shareholding. These funds constitute corporate capital and are entirely separate from any member tax recoupments.
- **Distinct Nature of IRS Investigation:** As detailed in the witness statement of **William R. Kimball** (Docket Entry 12), Mr. Kimball has initiated a formal referral to the IRS Criminal Investigation (CI) Division regarding Ms. Sanger's unauthorized use of his professional Electronic Return Originator (ERO) credentials. While this investigation into credential misuse may be lengthy, it has no bearing on the beneficial title to the corporate funds at issue in this Court. Mr. Kimball's report serves as a character witness to Ms. Sanger's bad faith, but the

investigation itself should not procedurally stall the determination of title for these Indonesian corporate assets.

- **Sanger's Lack of Ownership Evidence:** In her Answer (Docket Entry 9), Ms. Sanger relies solely on a "narrow" custodial authority framing based on documents she provided during onboarding. Crucially, she has provided no evidence of beneficial ownership or that she was the source of any funding. Sworn statements from my senior management team confirm she was a non-discretionary fiduciary with no lawful right to these funds.

**III. The Jurisdictional Nullity of UK Order 34/2023** The only conceivable justification Ms. Sanger could offer for her continued retention of these funds is her reliance on **UK Order 34/2023**. I maintain that this order is a jurisdictional nullity that has absolutely no authority over U.S.-situs assets or an Indonesian company. Furthermore, the UK Court of Appeal has failed to provide any directions since my comprehensive submission on January 5, 2026, representing a 60-day period of administrative obstruction. As a non-money judgment that has never been domesticated, this void order cannot be used to bypass an independent U.S. determination of title.

**IV. Requested Immediate Next Steps** To resolve this matter and return the capital to its rightful owner, I respectfully request that the Court:

1. **Registry Deposit:** Order the stakeholder to deposit the funds into the **Court Registry Investment System (CRIS)**.
2. **Limited Discovery:** Direct GoldSilver to produce the complete **onboarding and KYC files** provided by Ms. Sanger to expose the "secret" nature of her authority claims.
3. **Mediation/Determination:** Formally refer the parties to the **SDNY Mediation Program** to resolve the chain-of-title dispute.

Respectfully submitted,

*/s/ Iain Clifford* Iain Clifford, *pro se* iain@thegreatescape.me

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**CERTIFICATE OF SERVICE** I hereby certify that a true and correct copy of this filing has been served via email on this date to the Plaintiff's counsel and to Defendant Amy Jo Sanger.

**/s/ Iain Clifford**