

**COMPLAINT FILED AGAINST**

**Bayerisches Hauptmünzamt (The Bavarian State Mint)**

**Heimerle + Meule GmbH**

**Emporium Hamburg Münzhandelsgesellschaft mbH (Emporium Hamburg)**

**In Respect of OECD Guidelines for Multinational Enterprises on Responsible  
Business Conduct Breaches in Regard to Somalia Coinage**

**BEFORE THE**

**GERMAN OECD NATIONAL CONTACT POINT**

Submitted by:

**The Somalia Accountability & Transparency Organization (USA)**

through their Legal Representative and Contact Person:

Dr. Jonathan Levy, Attorney

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## **I. The Parties**

### **A. The Submitting Party**

This is a special instance complaint by the Somalia Accountability & Transparency Organization hereafter “**SATO.**” **The Somalia Accountability & Transparency Organization** “SATO” is a United States nonprofit corporation. SATO was founded by its CEO, Dr. Abdillahi Hashi Abib MP, Member of the Federal Republic of Somalia the House of People and leader of the Accountability and Transparency Caucus of the House of People.<sup>1</sup>

Dr. Abib is well known for his activities as an anti-corruption fighter and whistleblower in Somalia. He founded SATO in 2025 after he faced retaliation from elements of the Somali government which unsuccessfully attempted to remove him as a member of the Somali Parliament in retaliation for his anti-corruption campaign. Dr. Abib has faced numerous death threats following several high profile whistleblower allegations involving the governments of Somalia, UAE and Türkiye. He is also an advocate for stronger counter terrorism measures against Al-Shabaab.

The mission of SATO is to support accountability and transparency in Somalia and to seek resolutions for both current and legacy corruption involving the state and multinational enterprises that have exploited Somalia due to its historically weak governance structure.

SATO is necessary because the government of Somalia has consistently been ranked as one of the most corrupt in the world and has a past legacy of bribery which it is reluctant to address.

SATO is not affiliated with the Somalia government.

The submitting party is represented by its US lawyer and point of contact, Dr. Jonathan Levy.

### **B. The Receiving Parties**

#### **Bayerisches Hauptmünzamt**

(Bavarian State Mint)

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The Bavarian State Mint is a for-profit state-owned enterprise of the Free State of Bavaria. The Bavarian State Mint produces the Somalia Gold and Silver Elephant coins (part of the African Wildlife Series). There are no refineries or mints in Somalia, and there is no public record of formal agreements or official acknowledgment by the Central Bank of Somalia regarding these coins. Their legal status as purported Somali legal tender is therefore ambiguous, and their issuance is not officially documented by Somali authorities. The arrangement for producing these coins is considered controversial in the numismatic community, as it is unclear under what

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<sup>1</sup> Dr. Abib is a dual Somali-US citizen.

terms, if any, the Bavarian State Mint was mandated to mint them on behalf of Somalia nor has the Bavarian State Mint made any public disclosures about these coins.

### **Emporium Hamburg Münzhandelsgesellschaft mbH**

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Emporium Hamburg Münzhandelsgesellschaft mbH or “Emporium Hamburg” is one of the original issuers and distributors behind the Somalia Elephant and Leopard silver, gold, and platinum coin series also known as the African Wildlife series. Emporium Hamburg handled design, marketing, and distribution of the coins and was the “guiding mind” behind the operation. Based upon its on its admissions in a 2017 video (<https://www.youtube.com/watch?v=cckOb879jfY>), they are the “issuer,” and according to Commonwealth Mint’s Director, Emporium Hamburg is a party to coinage scheme.

### **Heimerle + Meule GmbH**

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The Commonwealth Mint and Philatelic Bureau Ltd. (“Commonwealth Mint”) is an English company that was acquired by Heimerle + Meule in 2022. At some unknown point in time Commonwealth became a promoter and purported issuer of some or all of the Somalia coins in addition to or in conjunction with Emporium Hamburg. Commonwealth Mint continues to be one of the guiding minds of the Somalia coinage scheme.

## **II. Summary of Special Instance Complaint**

The Republic of Somalia is the purported issuer of two of the world’s most respected bullion coins denominated in Somali shillings, The Elephant and the Leopard. These highly regarded coins sell at premiums of over 30% of bullion value. Since 2004, hundreds of millions of Euros worth of these coins have been produced by the Bavarian State Mint yet the Somalia government has received no royalties or payments in proportion to the wealth created. The respondents have also deprived the government of Somalia of seigneurie revenue while pocketing the proceeds of one of the world’s most successful bullion coin programs.

The right to issue coinage is an explicit right of monetary sovereignty vested in the nation state. Sovereign or government issue bullion is defined as bullion minted by a government or for a government and is denominated in the local currency. Government bullion is designated as legal tender coins thus, its purity and value is “backed” by that nation’s government.

This is a special instance complaint by SATO to the German NCP based upon the respondents long standing scheme to to mint hundreds of millions of Euros worth in

bullion coinage in the name of the Republic of Somalia since at least 2004 to present despite the Central Bank of Somalia disavowing any knowledge of these coins.

Some of the respondents made corrupt payments or bribes to purported agents of the Somalia government who obviously lacked authority to authorize a coinage program. The Bavarian State Mint endorsed the scheme even though the gold, platinum and silver used in the name of the Republic of Somalia was not purchased or authorised by the government of Somalia. The government of Somalia has no records of the coins or the bullion purchased in its name.

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023) Part VII deals with Combating Bribery and Other Forms of Corruption. Here there is a *prima facie* case of corruption.

The Somalia Central Bank is the only authority authorized to issue coinage in the name of the Republic of Somalia denominated in the national currency and bearing the national coat of arms. However the Central bank of Somalia has no official knowledge of this coinage issue which has been in existence since 2004.

The responding parties however present to the public a plausible fiction that their coins are “legal tender” issues of Somalia and that the coins were presumably authorized by appropriate Somalia officials and for which adequate compensation has been paid to the government of Somalia for the right to mint hundreds of million of Euros worth of gold, platinum and silver bullion coins since 2004 guaranteed as genuine by the Somalia government.

If the responding parties’ version of events *infra* are correct then both they and purported officials of the government of Somalia are intentionally concealing corrupt payments made to individuals who have misappropriated the proceeds. This form of bribery is all too common in Somalia.

But if the submitting party is correct, the responding parties have knowingly paid small bribes to purported Somalia government officials who lacked obvious authority to bind the Republic of Somalia to a decades’ long coinage program. In this case the bribery and corruption is in Germany and the unscrupulous perpetrators have undertaken a 20 year scheme of corruption to defraud the Somalia government of much needed revenue while enriching themselves and knowingly presenting a charade to the public.

In either case, Part VII of the OECD Guidelines has been violated.

### **III. Competence of the German NCP**

The German National Contact Point (NCP) is the competent authority to address this complaint. All the responding parties are headquartered in Germany and are German juridical entities including the Bavarian State Mint which is a state owned enterprise involved in multinational enterprise. The goods involved, coins, have their origin at the Bavarian State Mint. Further, Germany is a party to the OECD Anti-Bribery Convention also known as the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. Thus OECD MNE Guidelines violations involving bribery of foreign officials by German enterprises should be under the competence of the German NCP.

## **IV. Facts**

### **A. History of Somalia Government**

Since the collapse of President Siad Barre's regime in 1991, Somalia has experienced prolonged periods without a functioning central government. From 1991 until the early 2000s, the country was marked by civil war, fragmentation, and the absence of an internationally recognized authority. During this period, Somalia was often described as a stateless society or failed state. The capital, Mogadishu, and other areas were divided among competing warlords and factions.

In 2000, an attempt was made to form a Transitional National Government (TNG). In 2004, the Transitional Federal Government (TFG) was formed and gained international recognition as Somalia's central authority, though initially it controlled only limited territory and faced significant challenges in establishing effective governance.

In 2012, the TFG was replaced by the Federal Government of Somalia (FGS) and a national constitution was passed. The FGS continues to face challenges related to security, political fragmentation, terrorism, corruption and the presence of autonomous regions, but represents the current central government structure.

Throughout this period, Somalia's governance has been characterized by fragility, corruption, ongoing conflict, and efforts by the international community, the UN and OECD member states including Germany to support peacebuilding and state reconstruction.

Somalia is widely recognized as one of the most corrupt countries in the world, a view consistently reflected in international assessments by organizations such as the OECD, German government agencies, and the United Nations.

The OECD identifies corruption as a major barrier to economic development and governance in Somalia. The country's weak institutions, lack of regulatory frameworks, and prevalence of bribery and embezzlement are highlighted as key issues undermining both public trust and investment.<sup>2</sup>

German Based NGO Transparency International e.V. consistently has found Somalia to be among the most corrupt nations in the world, currently ranking it 179 out of 180 on its Corruption Perceptions Index.<sup>3</sup>

Both the United Nations and European Union have placed freezes on assets of individuals and entities designated by the UN or EU as threatening the peace, security, or stability of Somalia, and prohibits making funds available to them. Germany implements the sanctions imposed by the United Nations (UN) and the European Union (EU) as part of its obligations as a member state of both organizations.

While sanctions regimes explicitly exempt the Federal Government of Somalia (FGS) from restrictions, there remain significant risks and compliance obligations even when dealing with agents of the FGS.

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<sup>2</sup> Jin, Y. (2021). "Framework to discuss corruption in OECD Economic Surveys", OECD Economics Department Working Papers, No. 1666, OECD Publishing, Paris, <https://doi.org/10.1787/d1e523ef-en>

<sup>3</sup> Transparency International. (2024). "Our Work in Somalia." [www.transparency.org/en/countries/somalia](http://www.transparency.org/en/countries/somalia)

The United Kingdom Somalia (Sanctions) (EU Exit) Regulations 2020 apply to Heimerle + Meule's English subsidiary Commonwealth Mint and its conduct discussed *infra*. The UK regulations at §53 require "relevant firms" to exercise mandatory reporting of suspicious activity that may fall under the sanction's regime. A relevant firm includes a person engaged in the business of making, supplying, selling (including selling by auction) or exchanging gold (§54(g)).

EU restrictions on Somalia are similar to the UK. Therefore due diligence in dealing with purported Somali government officials regarding contracts involving millions of Euros in gold, platinum and silver would at a minimum require transparent and detailed record keeping and due diligence including verifying the identity and authority of counterparties and checking them against sanctions lists as well as guarding against misappropriation of funds.

The Bavarian State Mint as the source of the Somalia government gold and silver coinage would be expected to maintain detailed information going back to the inception of the coinage program in 2004.

## **B. Somalia Coinage Program**

The official currency of Somalia is the Shilling. According to Article 21 of The Central Bank of Somalia Act (Law no. 130 of 22 April 2012):

### **21. Issue of Notes and Coins, Legal Tender and Withdrawal**

1. The Bank shall have the sole right to issue notes and coins in Somalia and only those notes and coins shall be legal tender in Somalia;

2. The Bank shall have the sole power to:

a) determine the currency denominations which in aggregate can be accepted as legal tender;

b) determine the denomination, inscriptions, forms, material and other characteristics of the notes and coins issued by the Bank, in consultation with the Minister of Finance, and shall notify such in the Official Bulletin and in other media of public information likely to bring them to the attention of the public;

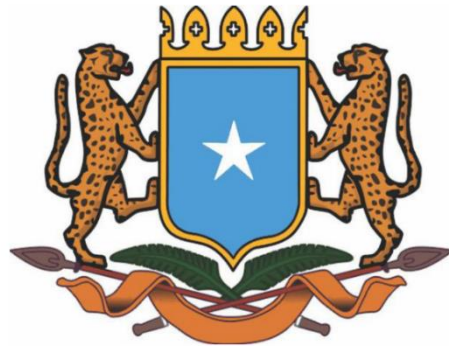
In 2004 the Bavarian State Mint began issuing the Somalia Gold and Silver Elephant coin series. The coins feature the official Somali coat of arms and are denominated in Somali Shillings. They are marketed and described as "legal tender." Each year, the obverse features a new elephant design, while the reverse displays the Somali national emblem, its coat of arms. The coins are .9999 fine gold and .999 fine silver and are popular with both investors and numismatists in Germany and worldwide for their artistry and as a store of wealth. Platinum coins have also been issued.

Article 6(b) of the Somalia Constitution of 2012 states:

The emblem of the Federal Republic of Somalia, as shown in section B of Schedule One, is a blue shield with a gold frame, in the centre of which is a silver-coated, five-pointed star. The shield is surmounted by a decorated emblem with five golden heads, with two lateral ones halved. The shield is borne from the sides by two leopards facing each

other under the lower point of the shield, along with two palm leaves, which are interlaced with a white ribbon.

#### SCHEDULE ONE (B) – THE SOMALI EMBLEM



The counterfeiting and use of the Somalia state seal is an offense against the Republic of Somalia in violation of the Somalia Penal Code §360. Counterfeiting the Seal of the State and Use of the Counterfeit Seal which states:

Art. 360. (Counterfeiting the Seal of the State and Use of the Counterfeit Seal). – Whoever counterfeits the seal of the State, intended to be affixed to Government documents or, without having participated in the counterfeiting, makes use of such seal counterfeited by others, shall be punished with imprisonment [96 P.C.] from three to six years and with fine [97 P.c.] from Sb. So. 1,000 to 20,000.

The unauthorized minting, sale, possession and distribution of gold, silver and metallic coinage falsely issued in the name of the Republic of Somalia is an offense in violation of Somalia Penal Code, Art. 395 which states:

Art. 348. (Counterfeiting Currency, Spending or Introducing into the State Counterfeit Currency by Concerted Action). –

a. 1. The following shall be punished with imprisonment [96 P.C.] from three to twelve years and with fine [97 P.C.] from Sh. So. 5,000 to 30,000:

a. a. whoever counterfeits national or foreign currency, being legal tender in the State or abroad;

b. b. whoever in any manner alters genuine currency by giving it the appearance of a higher value, or by decreasing its actual value;

c. c. whoever, not having been a party to the counterfeiting or alteration, but acting in concert with the person who has carried out the process or through an intermediary, introduces into the territory of the State [4 Canst., 4 P.c.] counterfeit or altered currency, or holds, spends or otherwise places it in circulation;

d. d. whoever, for the purpose of putting it into circulation, purchases or in any way receives counterfeit or altered currency from the person who has counterfeited it, or from an intermediary.

a. 2. The punishment shall be increased [118 P.C.] where, as a consequence of the act, the value of the national currency is decreased or its credit in the internal or external market is adversely affected [7c P.C.].

Although the Penal Code used the word “currency” this would apply to any lawful money such as coins especially when the value of the coins is denominated in the national currency, shillings.

The Penal Code also requires that any counterfeit coins in excess of twenty shillings be delivered up to the state authorities:

Art. 537. (Failure to Deliver up Coins Recognized as Counterfeit). –

Whoever, having received as genuine counterfeit or altered coins to an aggregate value of not less than Sh. So. 20, does not deliver them up to the authorities within three days from the date on which he becomes aware of the falsity or alteration, together with a statement of the source if he knows the same, shall be punished with fine [99 P.C.] up to Sh. So. 2,000 [349, 350 P.C.].

### **The Somalia Elephant**

The Somalia Elephant coin is usually minted in gold and silver and on occasion platinum by the Bavarian Mint and features the above emblem of the Somalia republic on the reverse.



The Somalia Gold and Silver Elephant coins are produced annually in several weights, with the 1 oz gold and silver coins being the most common. Somali Elephant coins enjoy strong global demand and are among the most recognized and collected bullion coins internationally. Their appeal is particularly high among collectors and investors seeking limited mintage and artistic variety. They are just behind the most dominant bullion coins like the American Eagle, Canadian Maple Leaf, and Krugerrand, which are favored by large-scale investors.

Germany and the United States are the leading regional markets for Somali Elephant bullion products, with additional demand from collectors throughout Europe. The

coins' international appeal is driven by their German minting, annual design changes, and strong distribution through major bullion dealers



The Bavarian State Mint does not officially release figures indicating the number of Elephant coins minted each year. This is an unusual practice for an ostensibly legal tender coin authorized by a sovereign nation. The appearance of limited issue may however make the coins more popular with collectors. By comparison, the Krugerrand, a once popular bullion coin had annual mintages in all weights ranging from 1 to 6 million annually. It is therefore likely that somewhere between 100,000 to 1,000,000 Elephants have been minted with a bullion value of €300 million to €1 billion.

### **The Somalia Leopard**

The Somalia Leopard coin is also produced by the Bavarian State Mint in gold and silver as part of the "African Wildlife" series. The Leopard coin was first introduced in 2018.



The Bavarian State Mint has issued these coins in many sizes and metals, including .9999 fine gold and .999 fine silver with annually changing designs featuring the African leopard.

According to retailers, the Bavarian State Mint holds a 2004 authorization from “Barbatunde Bobulobolou” authorizing the striking of Somalia coins.<sup>4</sup> Even if such a person existed, their authority would have ended with the establishment of the current Federal Republic of Somalia in 2012.

### **Donald Trump Elephant Gold Coin**

In 2020 Commonwealth Mint issued a gold 10,000 Shilling denominated coin with the bust of US President Donald Trump on the obverse and an elephant and the seal of Somalia on the reverse.

According to the official description utilized by retailers: This coin was struck on behalf of the Federal Republic of Somalia and is 10,000 Shillings legal tender.” Neither the Republic of Somalia nor Donald Trump authorized legal tender coinage with the bust of the president of the United States.



The Central Bank of Somalia has never acknowledged the legitimacy of the Trump, Elephant or Leopard coins.

### **C. Allegation from the Numismatic Community**

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<sup>4</sup> See Silver.com (2025). “Somalia Gold Elephants.” <https://www.silver.com/gold-bullion/gold-coins/gold-somalian-elephant-coins/>

Dr. Abib became aware of the controversy regarding the Elephant and Leopard coins through allegations that were publicly aired in the numismatic community. One article in particular by Sergey Goryainov for *Rough & Polished* raised serious allegations about the authority of the issuance, paucity of mintage information, funding for the coinage program and quantity and source of gold utilized for the gold Elephant coins.<sup>5</sup>

Dr. Abib MP as Leader of the Accountability and Transparency Caucus of the House of People had already launched an oversight investigation of alleged corruption at the Central Bank of Somalia and therefore also undertook a preliminary investigation of the allegations involving the Bavarian State Mint made by Goryainov.

Dr. Abib found that no one at the Central Bank of Somalia had knowledge of the Bavaria State Mint coinage program nor had any fees been paid to the Central Bank for the seigneurie rights or royalties. Further investigation showed no purchases of gold, silver or platinum by the Somali government for shipment to Germany or any relationship with the Bavarian State Mint by the Somali government.

In October 2024, Dr. Abib authorised counsel to contact Bavarian State Mint and other German companies with a connection to the coinage and advise them they were in violation of numerous sections of the Somali Penal Code including Counterfeiting the Seal of the State. As a result The Bavarian State Mint instructed the Director of Commonwealth Mint and Philatelic Bureau Ltd. a subsidiary of Heimerle + Meule GmbH to respond to Dr. Abib.

#### **D. Position of Commonwealth Mint**

On November 6, 2024, Shane Stark, Managing Director of the Commonwealth Mint contacted Dr. Abib at the request of the Bavarian State Mint by email:

**From:** Shane Stark <[shane.stark@thecommonwealthmint.co.uk](mailto:shane.stark@thecommonwealthmint.co.uk)>  
**Date:** November 6, 2024 at 9:26:26 AM EST  
**To:** [abdillahi.abib@parliament.gov.so](mailto:abdillahi.abib@parliament.gov.so)  
**Subject:** Clarifying Somalia Coinage

Dear Dr. Abib,

Your recent communication through Dr. John Levy to Bayerisches Hauptmunzamt regarding Somalia Coinage is appreciated. I wish to clarify that the Commonwealth Mint holds a valid agreement with the Central Bank of Somalia. This permits us to mint collector coins featuring Somalia's coat of arms, with Emporium Hamburg Munzhandelsgesellschaft mbH as a trusted client. The current agreement, authorized by Mrs. Surer Abshir Musse, is valid until 2027. We are eager to extend this partnership by another decade and would greatly value your support in facilitating this extension.

Please find my contact information below. I await your response.

Best regards,

**Shane Stark**  
Managing Director  
Mob: +44 7070 246 600

Despite the findings of Dr. Abib below, Commonwealth and Bavarian Mint's position is that Mrs. Surer Abshir Musse was a person who could properly assign the entire

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<sup>5</sup> Goryainov, S. (2023). "The mystery of the Somalia Gold Elephant." *Rough & Polished*. <https://rough-polished.expert/en/analytics/133176.html>

coinage program to Commonwealth Mint for over a decade and confirms that all three respondents were involved in the scheme.

Despite subsequent discussions (November 2024 to June 2025) between Dr. Abib and Commonwealth Mint's representatives, the matter has remained unresolved.

### **E. Further Investigation of Dr. Abib**

The Central Bank of Somalia as noted above has no knowledge of the Trump, Elephant, or Leopard coins.

Dr. Abib has obtained the Financial Statement and Audit of the Central Bank of Somalia for 2024 and the audits for 2022 and 2023 which are attached hereto as Annexes.

The audits make no mention of the Bavarian Mint coinage program. There are no entries for royalties or revenue from the coin program.

If the bullion and other coins referenced herein were legal tender or authorised by Central Bank of Somalia, they would be an asset before circulation and possibly a debit while in circulation. The coins however are not mentioned. Any references to coins appear to be to coins of the old pre 1991 Barre regime

Dr. Abib has confirmed that Mrs. Surer Abshir Musse was an information officer at the London Somalia embassy and propagandist for the genocidal Siad Barre regime until 1991. Upon the closing of the Somali embassy, she became a resident of England.

Mrs. Surer Ashir Musse according to Dr. Abib is unknown to the current or immediate past government and was never an official of the Central Bank of Somalia or the Finance Ministry. There is no record of her as a diplomat after 1991 though she may have continued to style herself as such given the confused situation in Somalia.

The most likely explanation is that Mrs. Surer Abshir Musse pocketed a bribe from the respondents to sign off on agreements that purportedly bound the Somalia government. It is unknown who initiated these agreements but it is clear a freelance diplomat cannot grant the rights to mint legal tender coinage on behalf of a sovereign nation.

The issuance of the Trump Elephant Somalia coin in 2020 by Commonwealth Mint however is unmistakable evidence of Commonwealth's contempt for the sovereignty of the Somalia government and its people and constitutes lèse-majesté against the office of the president of Somalia.

### **F. Other Coins**

In addition to the Elephant, Leopard, and Trump coins that can be positively attributed to the responding parties, many other coins were issued in the name of Somalia in gold, silver, and various other metals.

Dozens of these coins were issued since 1996, all with the obverse of the Somalia coat of arms and many denominated in Somali shillings. Their origins are currently unknown but it likely some or all had a connection to one or more of the responding parties.

A subset of these coins (over a dozen) are particularly offensive to the people of Somalia as the obverse features portraits of Catholic Popes, religious imagery and Saints which are "haram" or forbidden under Shari'ah law.



The Constitution of Somalia is truly clear that Somalia is an Islamic Republic and Shari'ah is the supreme law of the land:

#### **Article 2. State and Religion**

1. Islam is the religion of the State.
2. No religion other than Islam can be propagated in the country.
3. No law which is not compliant with the general principles of Shari'ah can be enacted.

Coins that promote the Catholic religion are clearly forbidden. Therefore, purportedly legal tender coins that promote saints and popes of the Catholic faith under the name of Somalia and its coat of arms must be withdrawn from circulation immediately.

#### **V. Respondents' Actions, Policies, & Omissions Violate OECD Guidelines**

Part VII of the OECD MNE Guidelines (2023) deals with bribery and other forms of corruption. The responding parties have engaged in both practices over a protracted period of time since 2004.

The circumstances of the acquisition of the original rights to mint Somalia coinage in 2004 is suspect. At that time Somalia had no functioning central bank. The only explanation is that a bribe was paid to some Somali officials for the right to mint coins as no record can be found of the "mythical" Barbatunde Bobulobolou the supposed grantor of these original rights.

The circumstances of Commonwealth Mint's purported dealing with Mrs. Surer Abshir Musse are similarly tainted as no enterprise dealing with the Somalia sanctions program would accept the word of a self-described diplomat that claimed they had signature power to convey the rights to mint legal tender coins for over a decade without regard to design, royalties, or quantity in exchange of a payment.

The state owned for-profit Bavarian State Mint is particularly to be faulted as even the least investigation and due diligence would reveal that the Somalia Central Bank was the appropriate party to deal with regarding coinage. Therefore only the

inducement of a profitable long term contract could cause one of Germany's oldest and most respected institutions to ignore due diligence and the sanctions program.

The responding parties have entered into a corrupt bargain to bribe Somalia pseudo officials to obtain a plausible fig leaf for their bullion coinage scheme.

The Bavarian State Mint has accepted a bribe in the form of a profitable contract to mint bullion coins in exchange for ignoring the numerous red flags including the warning of the Somalia Central Bank that the coinage program was unauthorized.

Therefore the responding parties have violated the first six sections of Part VII by engaging the payment of bribes to both Somalia officials and the state owned Bavarian State Mint; they have failed to establish or follow internal controls, ethics and compliance programmes or measures or adequately preventing, detecting and addressing bribery and other forms of corruption; they have made facilitation payments without adequate record keeping; they have failed to supervise their employees to prevent the payment of bribes and the fostering of corruption; their actions have not been transparent when confronted with allegations of corruption and bribery; and they have engaged in criminality despite whatever ethical processes that may have been in place.

## VI. Summary of Demands

**The submitting party request the good offices or mediation of the NCP in order to achieve some or all of the following:**

### A. Accounting

The responding parties are to publicly provide an Accounting of the Somalia Coinage program, with data such as mintage dates, number of pieces issued, authority, weights and sales data from 2004 to present. An example of some of this data requested is provided in the example below which is an example of an announcement of the issuance of pre 1991 Somalia gold legal tender coinage:



The responding parties will also provide copies of their “agreements” with and records of payment to purported officials of the Somali government.,

## **B. Transparency**

The responding parties are to develop a transparency protocol regarding any future issuance of Somali coinage and will publicly publish a true report of their scheme to the public including an apology to the Somalia government and its people and the numismatic community for their actions and deceptions.

## **C. Restitution**

The responding parties are to provide appropriate restitution in relation to their scheme to exploit the weak governance of Somalia for their profit. At a minimum restitution should include disgorgement of profits and unjust enrichment from the Somalia coinage program 2004 to date for the benefit of the Somali people and not further enrichment of politicians.

## **D. Implementation of Anti-Corruption Program**

The responding parties are to implement an anti-corruption program to prevent future unethical behavior toward developing nations and the numismatic community,

## **E. Special Plea for Assistance for Awdal State**

Dr. Abib is the MP for the Awdal State of Somalia. Awdal is currently experiencing prolonged drought conditions that threatens the people of that remote region.<sup>6</sup> According to Dr. Abib: “The people of Awdal State – especially in Saylac, Lughaya, and Baki – are suffering and dying. The land is dry. The animals are gone. The children are sick. Families are begging for water under a burning sun.”

It is noted that Heimerle + Meule GmbH is part of the Possehl Group (L. Possehl & Co. mbH) which passes profits to the non-profit Possehl Foundation, the sole shareholder.

It is therefore requested that Possehl Foundation, which is a beneficiary of the Somali coinage program, immediately redirect and extend some of those benefits to the people of Awdal through internationally recognized charities such as the IFRC, Islamic Relief Worldwide, or Médecins Sans Frontières,

## **F. Legal Costs**

SOTO seeks reimbursement for its direct legal costs in pursuing this matter.

## **G. Trump Coin**

SOTO demands the sequestration of all Trump coin dies, essays, and unissued stocks and related materials in the possession of respondents.

**H. Compliance with Shari’ah Law** The respondents are to assist SOTO in discovering the identities of those responsible for the issuance of Somalia coinage denominated in shillings depicting haram pictures on their obverse including Catholic saints and popes, promotion of non-Islamic religions, member of the British royal family,

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<sup>6</sup> IFRC. (May 27, 2025). World Hunger Day: Drought driving hunger and desperation in the Horn of Africa. <https://www.ifrc.org/article/world-hunger-day-drought-driving-hunger-and-desperation-horn-africa>

## VII. Conclusion

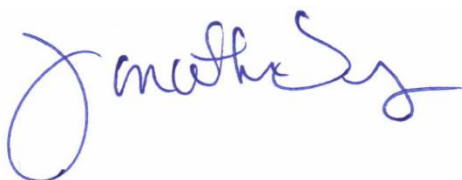
The responding parties embarked on a scheme in 2004 to exploit the lack of civil society and functioning government institutions in Somalia which had been devastated by civil war and terrorism. In carrying out this scheme they have engaged in bribery and corruption in order to conceal their original misappropriation of Somalia's sovereign right to mint coinage.

The victims of this scheme are numerous. The numismatic community and investors have been deceived into purchasing bullion coins worth hundreds of millions of Euros that are likely not legal tender nor guaranteed by a sovereign nation's central bank. The Somalia government has been denied revenue and royalties and its national indicia hijacked. The people of Somalia and its civil institutions have been humiliated by coinage issued in violation of their laws and customs. Bribery and corruption in Somalia has been encouraged by payments to pseudo officials who have misappropriated the proceeds. The UK, EU, and UN Somalia sanctions program has been flaunted by large gold and silver transactions that have not been properly documented nor the authority of the officials involved verified.

Lastly, the German government has been victimized by the disgraceful behavior of a state owned enterprise and bilateral relations with Somalia damaged. The principle of comity requires that Germany respect the sovereignty of Somalia. A German state owned enterprise should not be usurping the sovereign right of the Central Bank of Somalia to issue shillings anymore than the Central Bank of Somalia has the right to mint Euros without the permission of the European Central Bank.

In the absence of an Agreement with the some or all of the responding parties, the submitting party requests a finding of fact by the NCP and/or referral to appropriate German government agencies for investigation of the matters concerned herein.

Submitted on July 17, 2025 by:



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## ANNEXES ATTACHED

2024 Financial Statement and Audit of the Central Bank of Somalia

2023 Audit of the Central Bank of Somalia

2022 Audit of the Central Bank of Somalia