

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

**THE PEOPLE OF THE STATE OF NEW YORK**

-against-

**ISLAMIC REPUBLIC OF IRAN SHIPPING LINES**  
(a.k.a. **ARYA SHIPPING COMPANY**, a.k.a. **IRI SHIPPING LINES**, a.k.a. **IRISL**, a.k.a. **IRISL GROUP**);  
**HAFIZ DARYA SHIPPING LINES** (a.k.a. **HDS LINES**);  
**SAFIRAN PAYAM DARYA SHIPPING COMPANY** (a.k.a. **SAPID SHIPPING CO**);  
**ASIA MARINE NETWORK PTE. LTD.** (a.k.a. **ASIAN PERFECT MARINE PTE. LTD.**, a.k.a. **IRISL ASIA PTE LTD.**);  
**SINOSE MARITIME PTE. LTD.**;  
**LEADING MARITIME PTE. LTD.**;  
**CHEONG KHENG GUAN**;  
**ALIREZA GHEZELAYAGH**;  
**OASIS FREIGHT AGENCIES** (a.k.a. **OASIS FREIGHT AGENCIES LLC**);  
**GREAT OCEAN SHIPPING SERVICES LLC**;  
**PACIFIC SHIPPING COMPANY**;  
**MOGHADDAMI FARD**;  
**ALIREZA DAVOUDZADEH**;  
**IRINVESTSHIP LTD.**;  
**FAIRWAY SHIPPING LIMITED**; and  
**MOHAMMAD HADI PAJAND**

Defendants.

Indictment No.

**THE GRAND JURY OF THE COUNTY OF NEW YORK**, by this indictment, accuses the defendants **ISLAMIC REPUBLIC OF IRAN SHIPPING LINES** (a.k.a. **ARYA SHIPPING COMPANY**, a.k.a. **IRI SHIPPING LINES**, a.k.a. **IRISL**, a.k.a. **IRISL GROUP**), **HAFIZ DARYA SHIPPING LINES** (a.k.a. **HDS LINES**), **SAFIRAN PAYAM DARYA SHIPPING COMPANY** (a.k.a. **SAPID SHIPPING CO**), **ASIA MARINE NETWORK PTE. LTD.** (a.k.a. **ASIAN PERFECT MARINE PTE. LTD.**, a.k.a. **IRISL ASIA PTE. LTD.**), **SINOSE MARITIME PTE. LTD.**, **LEADING MARITIME PTE. LTD.**, **CHEONG KHENG GUAN**, **ALIREZA GHEZELAYAGH**, **OASIS FREIGHT AGENCIES** (a.k.a. **OASIS FREIGHT AGENCIES LLC**), **GREAT OCEAN SHIPPING SERVICES LLC**, **PACIFIC SHIPPING COMPANY**,

**MOGHADDAMI FARD, ALIREZA DAVOUDZADEH, IRINVESTSHIP LTD., FAIRWAY SHIPPING LIMITED, and MOHAMMAD HADI PAJAND** of the crime of Conspiracy in the Fifth Degree, in violation of Penal Law §105.05(1), committed as follows:

The defendants, in the County of New York and elsewhere, from on or about September 10, 2008 to on or about January 10, 2011, with the intent that conduct constituting a felony be performed, agreed with other persons known and unknown to the Grand Jury to engage in and cause the performance of such conduct.

### **I. Introduction to the Conspiracy**

The Grand Jury finds that at all times relevant to this indictment, **ISLAMIC REPUBLIC OF IRAN SHIPPING LINES** (a.k.a. ARYA SHIPPING COMPANY, a.k.a. IRI SHIPPING LINES, a.k.a. IRISL, a.k.a. IRISL GROUP) (“IRISL”) was the state-sponsored shipping line of the Islamic Republic of Iran (“Iran”). IRISL operated throughout the world, in major shipping centers, including Singapore, the United Arab Emirates (“UAE”), and the United Kingdom (“UK”). IRISL contracted for the construction of merchant ships, owned and operated ships under various national flags, and undertook shipping operations around the world under the control of the government of Iran. IRISL’s operations were executed through a network of subsidiaries and agents, including, among others, defendant ASIA MARINE NETWORK PTE. LTD. (a.k.a. ASIAN PERFECT MARINE PTE. LTD., a.k.a. IRISL ASIA PTE. LTD.) (“ASIA MARINE”) in Singapore, defendant OASIS FREIGHT AGENCIES (a.k.a. OASIS FREIGHT AGENCIES LLC) (“OASIS FREIGHT”) in the UAE, and defendant IRINVESTSHIP LTD. (“IRINVESTSHIP”) in the UK.

On September 10, 2008, the Office of Foreign Assets Control (“OFAC”) of the United States Department of the Treasury sanctioned – or “designated” – IRISL, ASIA MARINE, OASIS FREIGHT, and IRINVESTSHIP, among other entities, as proliferators of weapons of mass destruction. As explained more fully below, the designation by OFAC was designed to disrupt the economic operations of IRISL, its regional offices and their subsidiaries and agents; and in fact did interfere with their ability to conduct global business. Beginning on or about September 10, 2008, IRISL, ASIA MARINE, OASIS FREIGHT, and IRINVESTSHIP began using alias names and shell companies to gain access to the United States financial system to continue conducting their financial operations. Specifically, IRISL used the following defendant companies as aliases or corporate alter egos continue its

operations: HAFIZ DARYA SHIPPING LINES (a.k.a. HDS LINES) (“HDS LINES”) and SAFIRAN PAYAM DARYA SHIPPING COMPANY (a.k.a. SAPID SHIPPING CO) (“SAPID SHIPPING”). ASIA MARINE in Singapore used the following defendant companies as aliases or corporate alter egos to access U.S. financial institutions illegally: SINOSE MARITIME PTE. LTD. (“SINOSE MARITIME”) and LEADING MARITIME PTE. LTD. (“LEADING MARITIME”). OASIS FREIGHT in the UAE used the following defendant companies as aliases or corporate alter egos for the same purpose: GREAT OCEAN SHIPPING SERVICES LLC (“GREAT OCEAN SHIPPING”) and PACIFIC SHIPPING COMPANY (“PACIFIC SHIPPING”). Finally, IRINVESTSHIP in the UK used the defendant company FAIRWAY SHIPPING LIMITED (“FAIRWAY”) as an alias or corporate alter ego for the same purpose.

During the time period of the conspiracy, the defendants engaged in illicit commercial transactions through correspondent bank accounts domiciled in New York County totaling in excess of \$60 million.

## **II. Introduction to Sanctions**

In 1977, the U.S. government enacted the International Emergency Economic Powers Act (“IEEPA”), set forth in Title 50, sections 1701-1706 of the United States Code. IEEPA empowers the President of the United States to impose certain measures, including economic and trade sanctions, embargos, and other actions, in response to unusual and extraordinary threats to the national security, foreign policy, or economy of the United States when the President declares a national emergency with respect to such threats. For purposes herein, sanctions can be broken down into two broad categories: (a) country-based sanctions, such as those imposed on Iran; and (b) sanctions, or designations, imposed on individuals and entities for specific targeted misconduct, such as the proliferation of weapons of mass destruction.

### **A. Iranian Sanctions**

In 1987, President Ronald W. Reagan issued Executive Order 12613, which imposed an embargo on goods and services of Iranian origin. Between 1995 and 1997, President William J. Clinton issued Executive Orders 12957, 12959, and 13059, which strengthened the existing U.S. sanctions against Iran imposed pursuant to, inter alia, Section 505 of the International Security and Development Cooperation Act of 1985. The combined effect of

the Executive Orders was to declare a national emergency with respect to the actions and policies of the government of Iran and, through the power conferred by IEEPA and other statutes, to prohibit virtually all trade and investment activities with Iran by U.S. persons or entities, regardless of where they are located, including, but not limited to, broad prohibitions on the importation and exportation of goods or services from or to Iran (collectively, the “Iranian Sanctions”). The President delegated the authority to implement the Iranian Sanctions to the United States Department of the Treasury, which does so through OFAC.

### **B. Specially Designated Nationals and Proliferators of Weapons of Mass Destruction**

Pursuant to the powers authorized by IEEPA and other statutes, OFAC maintains a list of individuals and entities subject to financial and trade sanctions known as the “List of Specially Designated Nationals and Blocked Persons” (“SDN List”). The SDN List includes persons supporting terrorist activities, international narcotics kingpins, and those engaged in activities related to the proliferation of weapons of mass destruction. Individuals and entities included on the list are collectively called “Specially Designated Nationals” or “SDNs,” and they are referred to as having been designated. Generally, U.S. persons and institutions are prohibited from financial dealings with SDNs. Any property of an SDN in the possession of a U.S. person and any transaction by an SDN with a U.S. person must be “blocked” and seized.

On June 28, 2005, President George W. Bush issued Executive Order 13382, entitled “Blocking Weapons of Mass Destruction Proliferators and their Supporters.” This Executive Order generally prohibits all access to the U.S. financial system by designated persons and entities. Pursuant to Executive Order 13382, Title 31, Section 544 of the United States Code prohibits transactions of property and property interests of individuals and entities, and their supporters, engaging in the proliferation of weapons of mass destruction. Specifically, it applies sanctions to those individuals and entities providing direct or indirect financial, material, or technological support to these prohibited transactions and blocked property.

### **C. Designations by OFAC of IRISL and its Related Entities**

On September 10, 2008, IRISL and three of its regional offices (ASIA MARINE, OASIS FREIGHT and IRINVESTSHIP) were designated by OFAC pursuant to Executive Order 13382 as proliferators of weapons of mass destruction. Thus, from on or about September 10, 2008, IRISL, ASIA MARINE, OASIS FREIGHT, and IRINVESTSHIP were prohibited from accessing the U.S. financial system or otherwise engaging in business dealings with U.S. persons and entities. Also designated by OFAC on that day were 15 additional IRISL-related entities and 123 related vessels.

From in or about August 2010 through in or about February 2011, OFAC designated an additional 109 entities and individuals related to IRISL, as well as additional vessels, pursuant to Executive Order 13382. These designations included defendants HDS LINES and SAPID SHIPPING on June 16, 2010. Again, these designations were designed to interrupt IRISL's business operations, and with each new sanction, IRISL and the other defendants created or utilized companies to serve as aliases or corporate alter egos.

### **D. Designations by the United Nations and European Union**

In some instances entities sanctioned under U.S. law are also designated or sanctioned by the United Nations ("UN") or the European Union ("EU"). The effect is the same insofar as designated entities cannot lawfully use banking systems in countries recognizing and adopting those sanctions. The UN and EU have taken action against IRISL and related entities. UN Security Council Resolution 1803 (2008) called upon all States ". . . to inspect the cargoes to and from Iran, of aircraft and vessels, at their airports and seaports, owned or operated by Iran Air Cargo and Islamic Republic of Iran Shipping Line . . . ." UN Security Council Resolution 1929 (2010) designated three entities owned by, controlled by, or acted on behalf of IRISL. Similarly, the EU adopted Regulation (EU) No 668/2010 of July 26, 2010, which obligates Member States "to freeze economic resources of designated entities of the Islamic Republic of Iran Shipping Lines (IRISL)." These entities include IRISL, all of its branches and subsidiaries, HDS LINES, and SAPID SHIPPING. In addition, EU Council Decision 2010/644/CFSP of October 25, 2010 expanded the designations to include LEADING MARITIME for "act[ing] on behalf of [HDS LINES] in Singapore" and OASIS FREIGHT for "act[ing] on behalf of IRISL in the UAE" and "act[ing] on behalf of [HDS LINES]."

### **III. The Impact of IRISL's Designation and the Role of the U.S. Financial System in International Transactions**

In many aspects of global commerce, including the international maritime industry, contracts and payments are denominated in U.S. dollars. Such U.S. dollar transactions are primarily executed, or "cleared," through correspondent banks in the United States. The U.S. dollar clearing operations for many large U.S. financial institutions are processed through correspondent bank accounts domiciled in New York County. This was true for the banks that were deceived into processing wire payments on behalf of the defendants as charged in this indictment.

Once designated, IRISL and its known regional offices and agents could no longer engage in any commercial transactions with U.S. persons or entities, nor could they access the U.S. financial system in any manner whatsoever. These restrictions presented significant problems for IRISL because, without access to U.S. financial institutions, IRISL could not make or receive U.S. dollar payments relating to its commercial activities. U.S. financial institutions are obligated to follow and enforce U.S. sanctions, and they must block any payments sent by or to any of the IRISL-related entities. Indeed, in the months following the designation of IRISL, ASIA MARINE, OASIS FREIGHT, and IRINVESTSHIP, U.S. correspondent banks blocked a number of these entities' wire transfers. For example, between on or about September 24 and 25, 2008, three different German companies attempted to send wire transfers to an account held by OASIS FREIGHT at a bank in Dubai, UAE. These three wire transfers were blocked by a correspondent bank in New York County and reported to OFAC.

U.S. financial institutions use automated systems to screen the text of all incoming and outgoing international wire transfers. These monitoring systems, commonly referred to as "OFAC filters," are designed to recognize suspicious or prohibited transactions, including inbound and outbound fund transfers involving sanctioned countries and SDNs. These financial institutions have extensive compliance networks to ensure that they do not execute transactions on behalf of any sanctioned country or SDN. The compliance networks go beyond adherence to OFAC regulations and endeavor to protect the financial institutions from processing transactions that run contrary to their core business principles.

If a U.S. financial institution finds that a wire transfer originates from or is intended to benefit an SDN designated under OFAC's non-proliferation of weapons of mass

destruction program, the transfer would be blocked and the funds seized. In addition, the U.S. correspondent banks are required to maintain records of all OFAC violations and to file a written report with OFAC within ten days of the violation.

In order to deceive and bypass these OFAC filters, SDNs designated under OFAC's non-proliferation of weapons of mass destruction program must falsify, or cause to be falsified, the originator and/or beneficiary information in wire transfers. In other words, by omitting or falsifying data regarding their roles as the true originators or beneficiaries, SDNs are able to send and receive wire transfers that would otherwise be blocked by U.S. financial institutions. Through the fraudulent use of a web of subsidiary entities and front companies, IRISL and the other defendants were able to deceive U.S. financial institutions and maintain their access to the U.S. financial system.

#### **IV. Background of the Defendants**

As an international shipping company, IRISL conducted its business through regional offices and agencies throughout the world. Three of the countries in which IRISL operated are Singapore, the UAE, and the UK. Following their designations on September 10, 2008, IRISL, ASIA MARINE, OASIS FREIGHT, and IRINVESTSHIP employed a network of aliases or corporate alter egos, or they used existing companies to continue IRISL's business operations.

##### **A. Singapore**

After their September 10, 2008 designations, IRISL and ASIA MARINE in Singapore were prohibited from accessing the U.S. financial system. Subsequently, IRISL and ASIA MARINE continued to operate in Singapore through two aliases or corporate alter egos, SINOSE MARITIME and LEADING MARITIME. Both SINOSE MARITIME and LEADING MARITIME also served as agents of HDS LINES. Additionally, LEADING MARITIME served as an agent SAPID SHIPPING. Defendant CHEONG KHENG GUAN was the Managing Director of SINOSE MARITIME and was also the Director of LEADING MARITIME.

As early as March 2006, CHEONG KHENG GUAN outlined plans for a joint venture between SINOSE MARITIME and ASIA MARINE in a document entitled "Business Plan (3 Years)." In or about April 2006, CHEONG KHENG GUAN

transmitted a business profile for SINOSE MARITIME that referenced the joint venture and stated, “The Islamic Republic of Iran Shipping Lines (IRISL) has insisted that Sinose Maritime Pte Ltd have a joint venture with them in Singapore....” The profile went on to explain the exclusive relationship between SINOSE MARITIME and IRISL. Further details emerged from CHEONG KHENG GUAN later that year as he planned to create a company in Singapore that would be controlled by four directors: two from ASIA MARINE and two from SINOSE MARITIME.

Approximately two years later, on or about September 18, 2008, LEADING MARITIME was established in Singapore and comprised of employees from both ASIA MARINE and SINOSE MARITIME. The relationship between ASIA MARINE, SINOSE MARITIME, and LEADING MARITIME is demonstrated in documents submitted to a commercial bank in Singapore (referred to hereinafter as “Singapore Bank A”) for the opening of a U.S. dollar account in the name of “LEADING MARITIME PTE. LTD” on or about September 18, 2008. Two of the account signatories, CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH, were also employees of SINOSE MARITIME and ASIA MARINE, respectively.

From on or about September 12, 2008 to on or about March 19, 2010, approximately 23 wire transfers involving SINOSE MARITIME in the approximate amount of \$18,129,437.77 were cleared through the correspondent accounts of financial institutions in New York County, thereby causing the falsification of the business records of those financial institutions. All of these wire payments were sent to or from entities subsequently designated by OFAC as proliferators of weapons of mass destruction, their agents, or defendant FAIRWAY.

From on or about August 17, 2009 to on or about June 23, 2010, approximately 97 wire transfers involving LEADING MARITIME in the approximate amount of \$23,704,835.47 were cleared through the correspondent accounts of financial institutions in New York County, thereby causing the falsification of the business records of those financial institutions. All of these wire transfers either: (i) originated from LEADING MARITIME’s account at Singapore Bank A; or, (ii) were sent to or from entities subsequently designated by OFAC as proliferators of weapons of mass destruction, their agents, or defendant FAIRWAY.



## **B. United Arab Emirates**

After its September 10, 2008 designation, OASIS FREIGHT was prohibited from accessing the U.S. financial system. The solution for OASIS FREIGHT in the UAE was the same as that for ASIA MARINE in Singapore: companies were employed to act as aliases or corporate alter egos for OASIS FREIGHT. Two companies, GREAT OCEAN SHIPPING and PACIFIC SHIPPING, acted on behalf of OASIS FREIGHT. In the UAE, GREAT OCEAN SHIPPING was an agent of HDS LINES, and PACIFIC SHIPPING was an agent of both HDS LINES and SAPID SHIPPING.

Employees took on roles within multiple companies. For example, ALIREZA DAVOUDZADEH was the Operations Director of both GREAT OCEAN SHIPPING and PACIFIC SHIPPING. MOGHADDAMI FARD was the Managing Director of both OASIS FREIGHT and PACIFIC SHIPPING.

From on or about March 18, 2010 to on or about March 31, 2010, approximately three wire transfers involving GREAT OCEAN SHIPPING in the approximate amount of \$76,050.00 were cleared through the correspondent accounts of financial institutions in New York County, thereby causing the falsification of the business records of those financial institutions. All of these wire payments were from an entity subsequently designated by OFAC as a proliferator of weapons of mass destruction.

From on or about November 2, 2009 to on or about May 26, 2010, approximately five wire transfers involving PACIFIC SHIPPING in the approximate amount of \$5,200,000.00 were cleared through the correspondent accounts of financial institutions in New York County. All of these wire payments were sent to or from entities subsequently designated by OFAC as proliferators of weapons of mass destruction, their agents, or defendant FAIRWAY.

## **C. United Kingdom**

After its September 10, 2008 designation, IRINVESTSHIP was prohibited from accessing the U.S. financial system. Less than a month later, a company called FAIRWAY used the same address as that of IRINVESTSHIP, and began conducting U.S. dollar wire transfers. MOHAMMAD HADI PAJAND was the Managing Director of FAIRWAY and also an employee of IRINVESTSHIP. He was designated by OFAC as an SDN on

November 30, 2010 pursuant to OFAC's non-proliferation of weapons of mass destruction program.

From on or about October 30, 2008 to on or about March 1, 2010, approximately 36 wire transfers involving FAIRWAY in the approximate amount of \$16,398,598.70 were cleared through the correspondent accounts of financial institutions in New York County, thereby causing the falsification of the business records of those financial institutions. All of these wire payments were sent to or from entities subsequently designated by OFAC as proliferators of weapons of mass destruction and their agents.

## **V. Overt Acts**

In the course and in furtherance of the conspiracy, the conspirators and their agents committed and caused to be committed, in the County of New York and elsewhere, the following overt acts:

1. On or about February 23, 2009, an IRISL container line manager communicated the following: "We have changed names of all of our ships into English names. We will also be able to use leased containers instead of IRSU containers for this traffic. So no trace of IRISL at all in documentation. Nonetheless our present agents will be doing the work."
2. On or about January 17, 2010, an HDS LINES general manager circulated an HDS LINES agent contact list to employees of LEADING MARITIME, PACIFIC SHIPPING, and other agents of HDS LINES. This directory included a list of general and worldwide agents of HDS LINES organized by country, including, but not limited to, SINOSE MARITIME, LEADING MARITIME, GREAT OCEAN SHIPPING, and PACIFIC SHIPPING. For each agent listed, employee contact information was provided. Named on this list were CHEONG KHENG GUAN, Managing Director of SINOSE MARITIME; ALIREZA GHEZELAYAGH, CEO of LEADING MARITIME; and ALIREZA DAVOUDZADEH at PACIFIC SHIPPING.

**A. IRISL in Singapore: IRISL, ASIA MARINE, CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH Used the Alias or Corporate Alter Ego SINOSE MARITIME**

3. On or about May 8, 2009, a Customer Service representative of SINOSE MARITIME stated in a communication concerning the booking of a maritime shipment that SINOSE MARITIME acted as an agent “only for and on behalf of IRISL.”
4. On or about May 3, 2009, an employee of ASIA MARINE corresponded with ALIREZA GHEZELAYAGH and various departments of SINOSE MARITIME. The ASIA MARINE employee instructed SINOSE MARITIME to take action to resolve a shipment issue for ASIA MARINE.
5. A memorandum of agreement dated January 29, 2009 was distributed to an IRISL employee on behalf of CHEONG KHENG GUAN. This agreement was for the sale of the vessel “M/V I. Nabuvat” by SINOSE MARITIME for the purchase price of \$2,042,208.75. The vessel “IRAN NABUVAT” was designated by OFAC on September 10, 2008 as property of IRISL. The terms of the agreement required the buyers to pay a deposit of 20% of the purchase price (calculated as \$408,441.75) within three days of signing the agreement.
6. On or about February 2, 2009, SINOSE MARITIME received a wire transfer of \$408,441.75, an amount equal to 20% of the purchase price for the sale of the vessel “M/V I Nabuvat.” The wire details stated, “DEP FOR VESSEL I NABUVAT PER MEMO OF AGREEMENT DTD 29JAN09.” The wire payment was cleared through correspondent accounts of financial institutions in New York County.
7. On or about February 12, 2009, ASIA MARINE and SINOSE MARITIME caused a wire transfer in the approximate amount of \$500,000.00 to be cleared through correspondent accounts of a financial institution in New York County.
8. On or about November 16, 2009, ASIA MARINE and SINOSE MARITIME caused a wire transfer in the approximate amount of \$500,000.00 to be cleared through correspondent accounts of a financial institution in New York County.

**B. IRISL in Singapore: IRISL, ASIA MARINE, CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH Used the Alias or Corporate Alter Ego LEADING MARITIME**

9. On or about September 18, 2008, approximately eight days after the designation of ASIA MARINE by OFAC, a company named "Leading Maritime Pte. Ltd." was incorporated in Singapore as a private company, naming CHEONG KHENG GUAN as its sole director.
10. On or about September 18, 2008, a U.S. dollar account was opened at Singapore Bank A in the name of "LEADING MARITIME PTE. LTD." In the account opening documents for LEADING MARITIME: (i) the listed address of LEADING MARITIME was the same as the address listed for ASIA MARINE when it was designated by OFAC; and (ii) the telephone number of LEADING MARITIME matched the telephone number of ASIA MARINE.
11. In the same LEADING MARITIME account opening documents, CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH were listed as: (i) Director and Finance Manager of LEADING MARITIME, respectively; (ii) signatories for the account, authorized to operate and maintain the account; and (iii) the legal representatives, authorized to act on behalf of LEADING MARITIME.
12. On or about August 4, 2009, the U.S. dollar account held by LEADING MARITIME at Singapore Bank A received a wire payment of \$600,967.17. Although sent to the account held by LEADING MARITIME, this wire listed SAPID SHIPPING as the beneficiary. The wire transfer cleared through correspondent accounts at financial institutions located in New York County.
13. On or about March 1, 2010, ASIA MARINE and LEADING MARITIME caused a wire transfer in the approximate amount of \$500,000.00 to be cleared through correspondent accounts of a financial institution in New York County.
14. On or about March 1, 2010, ASIA MARINE and LEADING MARITIME caused a wire transfer in the approximate amount of \$379,464.77 to be cleared through correspondent accounts of a financial institution in New York County.
15. On or about August 17, 2009, ASIA MARINE, LEADING MARITIME, CHEONG KHENG GUAN, and ALIREZA GHEZELAYAGH caused a wire transfer in the approximate amount of \$400,000.00 to be cleared through correspondent accounts of a financial institution in New York County.

16. On or about March 19, 2010, ASIA MARINE, LEADING MARITIME, CHEONG KHENG GUAN, and ALIREZA GHEZELAYAGH caused a wire transfer in the approximate amount of \$174,043.41 to be cleared through correspondent accounts of a financial institution in New York County.

**C. IRISL in the UAE: IRISL, OASIS FREIGHT, MOGHADDAMI FARD, and ALIREZA DAVOUDZADEH Used the Alias or Corporate Alter Ego GREAT OCEAN SHIPPING**

17. On or about October 14 through 18, 2008, approximately one month after the OFAC designations of IRISL and OASIS FREIGHT, the Managing Director of OASIS FREIGHT, MOGHADDAMI FARD, discussed plans with managers of two entities, also designated by OFAC as SDNs, to establish a new shipping agency in Dubai, UAE.

18. On or about January 10, 2011, ALIREZA DAVOUDZADEH, acting as Operations Director of GREAT OCEAN SHIPPING, confirmed details for loading various vessels with an employee of HDS LINES and an employee of another entity designated by OFAC as an SDN.

19. On or about March 18, 2010, OASIS FREIGHT and GREAT OCEAN SHIPPING caused a wire transfer in the approximate amount of \$50,000.00 to be cleared through correspondent accounts of a financial institution in New York County.

20. On or about March 31, 2010, OASIS FREIGHT and GREAT OCEAN SHIPPING caused a wire transfer in the approximate amount of \$15,850.00 to be cleared through correspondent accounts of a financial institution in New York County.

**D. IRISL in the UAE: IRISL, OASIS FREIGHT, MOGHADDAMI FARD, and ALIREZA DAVOUDZADEH Used the Alias or Corporate Alter Ego PACIFIC SHIPPING**

21. On or about August 29, 2010, MOGHADDAMI FARD, an employee of OASIS FREIGHT, received correspondence addressed to his attention as Managing Director of "Pacific Shipping LLC." The correspondence was sent from a container line manager of IRISL and HDS LINES.

22. On or about April 6, 2010, OASIS FREIGHT and PACIFIC SHIPPING caused a wire transfer in the approximate amount of \$500,000.00 to be cleared through correspondent accounts of a financial institution in New York County.
23. On or about May 26, 2010, OASIS FREIGHT and PACIFIC SHIPPING caused a wire transfer in the approximate amount of \$2,500,000.00 to be cleared through correspondent accounts of a financial institution in New York County.

**E. IRISL in the UK: IRISL, IRINVESTSHIP, and MOHAMMAD HADI PAJAND Used the Alias or Corporate Alter Ego FAIRWAY**

24. On or about September 20, 2010, MOHAMMAD HADI PAJAND forwarded correspondence on FAIRWAY letterhead confirming MOHAMMAD HADI PAJAND as the Managing Director of FAIRWAY.
25. On or about October 19, 2010, MOHAMMAD HADI PAJAND wrote a memorandum on IRINVESTSHIP letterhead explaining the difficulties caused by pressure from the United States Department of the Treasury and the potential need to change the structure of the company.
26. On or about February 17, 2010, in response to an inquiry, MOHAMMAD HADI PAJAND provided specific information about which financial institutions were most likely to open U.S. dollar accounts for Iranian companies.
27. On or about November 9, 2009, IRINVESTSHIP and FAIRWAY caused a wire transfer in the approximate amount of \$8,250.00 to be cleared through correspondent accounts of a financial institution in New York County.
28. On or about February 12, 2010, IRINVESTSHIP and FAIRWAY caused a wire transfer in the approximate amount of \$500,000.00 to be cleared through correspondent accounts of a financial institution in New York County.

## **SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 12, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

## **THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 12, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

## **FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 25, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 25, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 29, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

## **SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 29, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.



## **EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 9, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

## **NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 9, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

## **TENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 13, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

#### **ELEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 13, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

#### **TWELFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 24, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

#### **THIRTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 24, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

#### **FOURTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 28, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

#### **FIFTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 28, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

#### **SIXTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 8, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **SEVENTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 8, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **EIGHTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 8, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **NINETEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 8, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **TWENTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 19, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

## **TWENTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 19, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

## **TWENTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., SINOSE MARITIME PTE. LTD. and CHEONG KHENG GUAN of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **TWENTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., SINOSE MARITIME PTE. LTD. and CHEONG KHENG GUAN of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **TWENTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., SINOSE MARITIME PTE. LTD. and CHEONG KHENG GUAN of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

### **TWENTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., SINOSE MARITIME PTE. LTD. and CHEONG KHENG GUAN of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

#### **TWENTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 4, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

#### **TWENTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 4, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

#### **TWENTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., SINOSE MARITIME PTE. LTD., IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 12, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

## **TWENTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., SINOSE MARITIME PTE. LTD., IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 12, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

## **THIRTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 31, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

## **THIRTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 31, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.



### **THIRTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 20, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

### **THIRTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 20, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

### **THIRTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 28, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.

### **THIRTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 28, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

### **THIRTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 12, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

### **THIRTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 12, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

### **THIRTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 16, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

### **THIRTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 16, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

### **FORTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 9, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

#### **FORTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 9, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

#### **FORTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 10, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

#### **FORTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 10, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

#### **FORTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 17, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

#### **FORTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 17, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

#### **FORTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

#### **FORTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and SINOSE MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

#### **FORTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **FORTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **FIFTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 21, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **FIFTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 21, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **FIFTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 11, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.



### **FIFTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 11, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **FIFTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 18, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **FIFTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 18, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **FIFTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 28, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **FIFTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 28, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **FIFTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 1, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **FIFTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 1, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **SIXTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 23, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **SIXTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 23, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **SIXTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., OASIS FRIGHT AGENCIES and PACIFIC SHIPPING COMPANY of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **SIXTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., OASIS FRIGHT AGENCIES and PACIFIC SHIPPING COMPANY of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **SIXTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 3, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **SIXTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 3, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **SIXTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 9, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **SIXTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 9, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **SIXTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 23, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.



### **SIXTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 23, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **SEVENTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 23, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

## **SEVENTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 23, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

## **SEVENTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 24, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **SEVENTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 24, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **SEVENTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 24, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **SEVENTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 24, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **SEVENTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **SEVENTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **SEVENTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

## **SEVENTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

## **EIGHTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **EIGHTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **EIGHTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **EIGHTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **EIGHTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.



#### **EIGHTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **EIGHTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

#### **EIGHTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 17, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

#### **EIGHTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 18, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

## **EIGHTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 18, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

## **NINETIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 21, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

### **NINETY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 21, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

### **NINETY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 22, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **NINETY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 22, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **NINETY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 24, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **NINETY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 24, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **NINETY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 28, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

#### **NINETY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 28, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

#### **NINETY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 28, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **NINETY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 28, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDREDTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 31, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.



## **ONE HUNDRED FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 31, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

## **ONE HUNDRED SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 31, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **ONE HUNDRED THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 31, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **ONE HUNDRED FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDRED SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained Bank of New York Mellon Corporation.

### **ONE HUNDRED SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

### **ONE HUNDRED EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **ONE HUNDRED NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDRED TENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 6, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

### **ONE HUNDRED ELEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 6, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

### **ONE HUNDRED TWELFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 6, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **ONE HUNDRED THIRTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 6, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDRED FOURTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 12, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

#### **ONE HUNDRED FIFTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 12, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

#### **ONE HUNDRED SIXTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 12, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.



### **ONE HUNDRED SEVENTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 12, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED EIGHTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

### **ONE HUNDRED NINETEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

**ONE HUNDRED TWENTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

**ONE HUNDRED TWENTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED TWENTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 22, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **ONE HUNDRED TWENTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 22, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDRED TWENTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 27, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **ONE HUNDRED TWENTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 27, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED TWENTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 27, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

### **ONE HUNDRED TWENTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 27, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

### **ONE HUNDRED TWENTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or January 27, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

**ONE HUNDRED TWENTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 27, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

**ONE HUNDRED THIRTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **ONE HUNDRED THIRTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED THIRTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **ONE HUNDRED THIRTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED THIRTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 2, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.



#### **ONE HUNDRED THIRTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 2, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDRED THIRTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 3, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **ONE HUNDRED THIRTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 3, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **ONE HUNDRED THIRTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 3, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **ONE HUNDRED THIRTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 3, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED FORTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 3, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

**ONE HUNDRED FORTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 3, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

**ONE HUNDRED FORTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 3, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **ONE HUNDRED FORTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 3, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDRED FORTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

#### **ONE HUNDRED FORTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

#### **ONE HUNDRED FORTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **ONE HUNDRED FORTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDRED FORTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 9, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

#### **ONE HUNDRED FORTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 9, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

#### **ONE HUNDRED FIFTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 9, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.



### **ONE HUNDRED FIFTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 9, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED FIFTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 9, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

### **ONE HUNDRED FIFTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 9, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

### **ONE HUNDRED FIFTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 10, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

### **ONE HUNDRED FIFTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 10, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon was required to make and file with the United States government.

### **ONE HUNDRED FIFTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 16, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

### **ONE HUNDRED FIFTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 16, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

### **ONE HUNDRED FIFTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 16, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

#### **ONE HUNDRED FIFTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 16, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

#### **ONE HUNDRED SIXTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **ONE HUNDRED SIXTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **ONE HUNDRED SIXTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **ONE HUNDRED SIXTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED SIXTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 23, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

#### **ONE HUNDRED SIXTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 23, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

#### **ONE HUNDRED SIXTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or February 24, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by JPMorgan Chase & Co.

#### **ONE HUNDRED SIXTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 24, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report JPMorgan Chase & Co. was required to make and file with the United States government.

**ONE HUNDRED SIXTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

**ONE HUNDRED SIXTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.



**ONE HUNDRED SEVENTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

**ONE HUNDRED SEVENTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

### **ONE HUNDRED SEVENTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

### **ONE HUNDRED SEVENTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 4, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDRED SEVENTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 9, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

#### **ONE HUNDRED SEVENTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 9, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

#### **ONE HUNDRED SEVENTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 12, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V..

**ONE HUNDRED SEVENTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 12, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

**ONE HUNDRED SEVENTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 15, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V.

#### **ONE HUNDRED SEVENTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 15, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDRED EIGHTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 15, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

### **ONE HUNDRED EIGHTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 15, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

### **ONE HUNDRED EIGHTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 16, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V..

### **ONE HUNDRED EIGHTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 16, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED EIGHTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 17, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

**ONE HUNDRED EIGHTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 17, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

**ONE HUNDRED EIGHTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 17, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V..



### **ONE HUNDRED EIGHTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 17, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED EIGHTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 18, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V..

### **ONE HUNDRED EIGHTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 18, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED NINETIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 18, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V..

### **ONE HUNDRED NINETY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 18, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED NINETY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **ONE HUNDRED NINETY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **ONE HUNDRED NINETY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V..

#### **ONE HUNDRED NINETY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 19, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

#### **ONE HUNDRED NINETY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 22, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by ABN Amro N.V. now known as The Royal Bank of Scotland N.V..

### **ONE HUNDRED NINETY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD., LEADING MARITIME PTE. LTD., CHEONG KHENG GUAN and ALIREZA GHEZELAYAGH of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 22, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report ABN Amro N.V. now known as The Royal Bank of Scotland N.V. was required to make and file with the United States government.

### **ONE HUNDRED NINETY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 22, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

### **ONE HUNDRED NINETY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 22, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

### **TWO HUNDREDTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 23, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

### **TWO HUNDRED FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 23, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **TWO HUNDRED SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 23, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **TWO HUNDRED THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 23, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **TWO HUNDRED FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 24, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by HSBC Bank USA, N.A.



## **TWO HUNDRED FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 24, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report HSBC Bank USA, N.A. was required to make and file with the United States government.

## **TWO HUNDRED SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 25, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **TWO HUNDRED SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 25, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **TWO HUNDRED EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 30, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

## **TWO HUNDRED NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 30, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

## **TWO HUNDRED TENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or March 31, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **TWO HUNDRED ELEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 31, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **TWO HUNDRED TWELFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or April 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by JPMorgan Chase & Co.

## **TWO HUNDRED THIRTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report JPMorgan Chase & Co. was required to make and file with the United States government.

## **TWO HUNDRED FOURTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or April 13, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

## **TWO HUNDRED FIFTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 13, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

## **TWO HUNDRED SIXTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or April 20, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

## **TWO HUNDRED SEVENTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 20, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

## **TWO HUNDRED EIGHTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or April 20, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by JPMorgan Chase & Co.

## **TWO HUNDRED NINETEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 20, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report JPMorgan Chase & Co. was required to make and file with the United States government.

## **TWO HUNDRED TWENTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or April 27, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

## **TWO HUNDRED TWENTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 27, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

## **TWO HUNDRED TWENTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 6, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

### **TWO HUNDRED TWENTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 6, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

### **TWO HUNDRED TWENTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 12, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

### **TWO HUNDRED TWENTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 12, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

## **TWO HUNDRED TWENTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 14, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by JPMorgan Chase & Co.

## **TWO HUNDRED TWENTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 14, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report JPMorgan Chase & Co. was required to make and file with the United States government.

## **TWO HUNDRED TWENTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 20, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.



## **TWO HUNDRED TWENTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 20, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

## **TWO HUNDRED THIRTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 25, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **TWO HUNDRED THIRTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 25, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **TWO HUNDRED THIRTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

## **TWO HUNDRED THIRTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 1, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

## **TWO HUNDRED THIRTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 8, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

## **TWO HUNDRED THIRTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 8, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

## **TWO HUNDRED THIRTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 14, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

## **TWO HUNDRED THIRTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 14, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

## **TWO HUNDRED THIRTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 23, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Standard Chartered Bank.

## **TWO HUNDRED THIRTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 23, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Standard Chartered Bank was required to make and file with the United States government.

## **TWO HUNDRED FORTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES and GREAT OCEAN SHIPPING SERVICES LLC of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 18, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **TWO HUNDRED FORTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES and GREAT OCEAN SHIPPING SERVICES LLC of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 18, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **TWO HUNDRED FORTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES and GREAT OCEAN SHIPPING SERVICES LLC of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 18, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **TWO HUNDRED FORTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES and GREAT OCEAN SHIPPING SERVICES LLC of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 18, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **TWO HUNDRED AND FORTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES and GREAT OCEAN SHIPPING SERVICES LLC of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 31, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **TWO HUNDRED FORTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES and GREAT OCEAN SHIPPING SERVICES LLC of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 31, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **TWO HUNDRED FORTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 30, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

**TWO HUNDRED FORTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 30, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

**TWO HUNDRED AND FORTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 20, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of America, N.A.

**TWO HUNDRED AND FORTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 20, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of America, N.A. was required to make and file with the United States government.

## **TWO HUNDRED FIFTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 22, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of New York Mellon Corporation.

## **TWO HUNDRED FIFTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 22, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of New York Mellon Corporation was required to make and file with the United States government.

## **TWO HUNDRED FIFTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 5, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.



### **TWO HUNDRED FIFTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 5, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **TWO HUNDRED FIFTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 6, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

**TWO HUNDRED FIFTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 6, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

**TWO HUNDRED FIFTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 15, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Citibank, N.A.

**TWO HUNDRED FIFTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 15, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Citibank, N.A. was required to make and file with the United States government.

## **TWO HUNDRED FIFTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 20, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

## **TWO HUNDRED FIFTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 20, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

## **TWO HUNDRED SIXTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 22, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **TWO HUNDRED SIXTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about January 22, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **TWO HUNDRED SIXTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 3, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **TWO HUNDRED SIXTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 3, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

**TWO HUNDRED SIXTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 9, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

**TWO HUNDRED SIXTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 9, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

**TWO HUNDRED SIXTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 19, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

**TWO HUNDRED SIXTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 19, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

**TWO HUNDRED SIXTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 30, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

**TWO HUNDRED SIXTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 30, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

## **TWO HUNDRED SEVENTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 1, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

## **TWO HUNDRED SEVENTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 1, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

## **TWO HUNDRED SEVENTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 2, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **TWO HUNDRED SEVENTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 2, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **TWO HUNDRED SEVENTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 2, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **TWO HUNDRED SEVENTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 2, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.



**TWO HUNDRED SEVENTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 25, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

**TWO HUNDRED SEVENTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 25, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

## **TWO HUNDRED SEVENTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 26, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Wachovia Bank now known as Wells Fargo Bank, N.A.

## **TWO HUNDRED SEVENTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 26, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Wachovia Bank now known as Wells Fargo Bank, N.A. was required to make and file with the United States government.

## **TWO HUNDRED EIGHTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 1, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

## **TWO HUNDRED EIGHTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 1, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

## **TWO HUNDRED EIGHTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 1, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Wachovia Bank now known as Wells Fargo Bank, N.A.

## **TWO HUNDRED EIGHTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 1, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Wachovia Bank now known as Wells Fargo Bank, N.A. was required to make and file with the United States government.

## **TWO HUNDRED EIGHTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 7, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

## **TWO HUNDRED EIGHTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 7, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

## **TWO HUNDRED EIGHTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 7, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

**TWO HUNDRED EIGHTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 7, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

**TWO HUNDRED EIGHT-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 14, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

**TWO HUNDRED EIGHTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 14, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

## **TWO HUNDRED NINETIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 29, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

## **TWO HUNDRED NINETY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about July 29, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

## **TWO HUNDRED NINETY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 26, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of America, N.A.

### **TWO HUNDRED NINETY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 26, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of America, N.A. was required to make and file with the United States government.

### **TWO HUNDRED NINETY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 27, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **TWO HUNDRED NINETY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 27, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

**TWO HUNDRED NINETY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 10, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of America, N.A.

**TWO HUNDRED NINETY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 10, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of America, N.A. was required to make and file with the United States government.

**TWO HUNDRED NINETY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 18, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Bank of America, N.A.



## **TWO HUNDRED NINETY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about September 18, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Bank of America, N.A. was required to make and file with the United States government.

## **THREE HUNDREDTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 9, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Citibank, N.A.

## **THREE HUNDRED FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 9, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Citibank, N.A. was required to make and file with the United States government.

### **THREE HUNDRED SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 14, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Citibank, N.A.

### **THREE HUNDRED THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 14, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Citibank, N.A. was required to make and file with the United States government.

### **THREE HUNDRED FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 9, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Wachovia Bank now known as Wells Fargo Bank, N.A.

### **THREE HUNDRED FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 9, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Wachovia Bank now known as Wells Fargo Bank, N.A. was required to make and file with the United States government.

### **THREE HUNDRED SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 25, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **THREE HUNDRED SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 25, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **THREE HUNDRED EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 23, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **THREE HUNDRED NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD. and FAIRWAY SHIPPING LIMITED of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about December 23, 2009 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government.

### **THREE HUNDRED TENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD., FAIRWAY SHIPPING LIMITED, OASIS FRIGHT AGENCIES and PACIFIC SHIPPING COMPANY of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 12, 2010 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Deutsche Bank Trust Company Americas.

### **THREE HUNDRED ELEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants IRINVESTSHIP LTD., FAIRWAY SHIPPING LIMITED, OASIS FRIGHT AGENCIES and PACIFIC SHIPPING COMPANY of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 12, 2010 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Deutsche Bank Trust Company Americas was required to make and file with the United States government

### **THREE HUNDRED TWELFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES and PACIFIC SHIPPING COMPANY of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 12, 2010 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by Citibank, N.A.

### **THREE HUNDRED THIRTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES and PACIFIC SHIPPING COMPANY of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about February 12, 2010 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report Citibank, N.A. was required to make and file with the United States government.

### **THREE HUNDRED FOURTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES, PACIFIC SHIPPING COMPANY, ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 6, 2010 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by JPMorgan Chase & Co.

### **THREE HUNDRED FIFTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES, PACIFIC SHIPPING COMPANY, ASIA MARINE NETWORK PTE. LTD. and LEADING MARITIME PTE. LTD. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about April 6, 2010 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report JPMorgan Chase & Co. was required to make and file with the United States government.

### **THREE HUNDRED SIXTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES and PACIFIC SHIPPING COMPANY of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 26, 2010 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry in the business records of an enterprise, to wit, wire transfer records maintained by JPMorgan Chase & Co.

**THREE HUNDRED SEVENTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuses the defendants OASIS FREIGHT AGENCIES and PACIFIC SHIPPING COMPANY of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law § 175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about May 26, 2010 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, prevented the making of a true entry and caused the omission thereof in the business records of an enterprise, to wit, a report JPMorgan Chase & Co. was required to make and file with the United States government.

CYRUS R. VANCE, JR.  
District Attorney