

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

THE PEOPLE OF THE STATE OF NEW YORK

-against-

LI FANG WEI (a/k/a KARL LEE, a/k/a PATRIC,  
a/k/a SUNNY BAI, a/k/a K. LEE a/k/a KL, a/k/a  
DAVID LI, a/k/a F.W. LI) and

LIMMT ECONOMIC AND TRADE COMPANY,  
LTD., (a/k/a LIMMT (DALIAN FTZ)  
METALLURGY AND MINERALS CO., LTD., a/k/a  
LIMMT (DALIAN FTZ) MINMETALS AND  
METALLURGY CO., LTD., a/k/a LIMMT (DALIAN  
FTZ) METALLURGY AND MINERALS CO., LTD.,  
a/k/a ANSI METALLURGY INDUSTRY CO. LTD.,  
a/k/a BLUE SKY INDUSTRY CORPORATION,  
a/k/a SC (DALIAN) INDUSTRY & TRADE CO.,  
LTD., a/k/a SINO METALLURGY AND  
MINMETALS INDUSTRY CO., LTD., a/k/a  
SUMMIT INDUSTRY CORPORATION, a/k/a  
LIAONING INDUSTRY & TRADE CO., LTD., a/k/a  
WEALTHY OCEAN ENTERPRISES LTD.),

Defendants

Indictment No.

**THE GRAND JURY OF THE COUNTY OF NEW YORK**, by this indictment, accuse the defendants **LI FANG WEI** (a/k/a KARL LEE, a/k/a PATRIC, a/k/a SUNNY BAI, a/k/a K. LEE a/k/a KL, a/k/a DAVID LI, a/k/a F.W. LI) and **LIMMT ECONOMIC AND TRADE COMPANY, LTD.**, (a/k/a LIMMT (DALIAN FTZ) METALLURGY AND MINERALS CO., LTD., a/k/a LIMMT (DALIAN FTZ) MINMETALS AND METALLURGY CO., LTD., a/k/a LIMMT (DALIAN FTZ) METALLURGY AND MINERALS CO., LTD., a/k/a ANSI METALLURGY INDUSTRY CO. LTD., a/k/a BLUE SKY INDUSTRY CORPORATION, a/k/a SC (DALIAN) INDUSTRY & TRADE CO., LTD., a/k/a SINO METALLURGY AND MINMETALS INDUSTRY CO., LTD., a/k/a SUMMIT INDUSTRY CORPORATION, a/k/a LIAONING INDUSTRY & TRADE CO., LTD., a/k/a WEALTHY OCEAN

ENTERPRISES LTD.) (referred to hereafter as “LIMMT”) 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 in or about November 2006 to in or about September 2008, with 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.

### **Background to the Conspiracy**

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

The Grand Jury finds that at all times relevant to this indictment, LI FANG WEI (a/k/a KARL LEE, a/k/a PATRIC, a/k/a SUNNY BAI, a/k/a K. LEE a/k/a KL, a/k/a DAVID LI, a/k/a F.W. LI), was and is the principal and commercial manager of a metallurgical production company in Dalian, China, called, at various times, LIMMT ECONOMIC AND TRADE COMPANY, LTD., a/k/a LIMMT (DALIAN FTZ) METALLURGY AND MINERALS CO., LTD., a/k/a LIMMT (DALIAN FTZ) MINMETALS AND METALLURGY CO., LTD., a/k/a LIMMT (DALIAN FTZ) METALLURGY AND MINERALS CO., LTD. (“LIMMT”). LIMMT is a commercial provider of metal alloys and minerals to the global market with two primary lines of business. First, LIMMT sells to commercial customers throughout the world standard metallurgical products. Second, LIMMT sells to subsidiary agencies of the Iranian Defense Industries Organization high strength metals and sophisticated military materials, some of which are banned by the Nuclear Supplier’s Group (or “NSG”)<sup>1</sup> and the Missile Technology Control Regime (or “MTCR”).<sup>2</sup>

On June 13, 2006, the United States Department of the Treasury (or “Treasury”) sanctioned LIMMT for its support of and role in the proliferation of weapons of mass destruction (or “WMD”). As a result of the sanctions, discussed below, LIMMT was

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<sup>1</sup> The Nuclear Supplier’s Group is a voluntary partnership of nuclear supplier countries focused on the prevention of nuclear weapons proliferation through the implementation of guidelines for nuclear exports and nuclear related exports. China is a member of the NSG.

<sup>2</sup> The Missile Technology Control Regime is a voluntary partnership of member nations aimed at preventing the proliferation of weapons of mass destruction through the implementation of export guidelines for items relevant to missile development, production and operation.

banned from engaging in transactions with or through the U.S. financial system, and remains banned to this day. Subsequently, LI FANG WEI and LIMMT used alias names and shell companies to continue LIMMT'S international business. LI FANG WEI and LIMMT'S purpose in doing so was to use fraud and deception to gain access to the U.S. financial system, to deceive United States and international authorities, and to continue the proliferation of banned weapons material to the Iranian military.

Armed Logistics is a division of the Iranian Ministry of Defense, whose primary objective is to procure and produce weaponry for the Iranian military. Within the Armed Logistics Division is the Iranian Defense Industries Organization (or "DIO" also known by its Farsi name, Sazemane Sanaye Defa or "SSD"). The DIO was sanctioned by the United States on March 30, 2007 for activities related to the proliferation of weapons of mass destruction. The DIO employs numerous contractors and subsidiary organizations to procure and produce weaponry for the Iranian military. It is through these subsidiary organizations that LI FANG WEI and LIMMT sold weapons material to the Iranian military.

## **II. LI FANG WEI and LIMMT'S Use of Fraud and Deception to Evade Sanctions and International Scrutiny**

Once LIMMT was sanctioned for its WMD proliferation activities, its name was added to a list of entities banned under U.S. law from conducting business with U.S. persons and entities. Thus, LIMMT was forced to engage in deception and fraud to ensure that its U.S. dollar payments would be cleared by U.S. banks. LIMMT, through its principal LI FANG WEI, used alias names and shell companies to deceive U.S. financial institutions into processing its international payments. Aliases used by LIMMT in furtherance of this scheme include: ANSI METALLURGY INDUSTRY CO., LTD.; BLUE SKY INDUSTRY CORPORATION; SINO METALLURGY AND MINMETALS INDUSTRY CO., LTD.; SC (DALIAN) INDUSTRY & TRADE CO., LTD.; SUMMIT INDUSTRY CORPORATION; LIAONING INDUSTRY & TRADE CO., LTD.; and WEALTHY OCEAN ENTERPRISES LTD. LIMMT also utilized the account of Sunny Minerals Company Limited in furtherance of the scheme.

LI FANG WEI and LIMMT'S use of fraud and its violations of U.S. and international sanctions were not limited to using aliases to access U.S. banks. LI FANG WEI and LIMMT also used alias names to continue to provide weapons materials to subsidiary organizations of the DIO, including Amin Industrial Group, Khorasan Metallurgy Industries, Shahid Sayyade Shirazi Industries, and Yazd Metallurgy Industries. These shipments included, among other materials, high strength aluminum alloys, maraging steel, graphite, tungsten copper, tungsten powder, and other sophisticated dual-use and weapons materials. The shipments of many of these materials were in direct contravention of the international guidelines set forth by the NSG and the MTCR, and many of these materials are consistent with materials used in the production of nuclear weapons and ballistic missiles.

### **III. Introduction to Sanctions**

In 1977, the United States government enacted the International Emergency Economic Powers Act ("IEEPA"), set forth in Title 50, sections 1701-1707 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 the Iranian country sanctions; and (b) sanctions imposed on individuals and entities for specific targeted misconduct, such as the proliferation of weapons of mass destruction. The two categories are discussed as follows.

#### **A. Iranian Sanctions**

In 1987, President Ronald W. Reagan issued Executive Order 12613 which imposed an embargo on Iranian-origin goods and services. In 1995 and 1997, President William J. Clinton issued Executive Orders 12957, 12959, and 13059, which strengthened the existing United States 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, 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 its Office of Foreign Assets Control (“OFAC”).

### **B. Specially Designated Nationals**

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 companies included on the list are collectively called “Specially Designated Nationals” or “SDNs,” and they are referred to as having been “designated.” Generally, with minor exceptions, 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. 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 basically prohibits all access to the U.S. financial system by persons and entities designated pursuant to the Executive Order. In many, although not all, instances, entities sanctioned under U.S. law are also “designated” or “sanctioned” by the United Nations or the European Union. The effect is the same: sanctioned entities cannot lawfully use banking systems in countries recognizing and adopting the sanctions.

### **C. LIMMT’S Designations**

On June 13, 2006, OFAC designated LIMMT pursuant to Executive Order 13382 for engaging in activities supporting the proliferation of weapons of mass destruction.

Thus, beginning on June 13, 2006, LIMMT was a Specially Designated National for the proliferation of weapons of mass destruction, and was prohibited from accessing the U.S. financial system or otherwise engaging in business dealings with U.S. persons and entities.<sup>3</sup>

#### **IV. The Impact of LIMMT'S Designation and the Role of the U.S. Financial System in International Transactions**

Once designated, LIMMT could no longer engage in any commercial transactions with U.S. persons or entities, nor utilize the U.S. financial system in any manner whatsoever. This presented significant problems for LI FANG WEI and LIMMT. In many aspects of global commerce, contracts and payments are denominated in U.S. dollars. Such transactions are generally 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 the County and State of New York. This is true for the banks that were deceived into processing wires on behalf of LI FANG WEI and LIMMT, including The Bank of New York Mellon, Citibank, N.A., JPMorgan Chase & Co., Wachovia Bank, N.A., Bank of America, N.A. and American Express Bank, Ltd.

Many of LIMMT'S contracts called for payment to be rendered in U.S. dollars. Therefore, transacting in U.S. dollars was a prohibited and risky proposition because, as discussed herein, sanctioned entities and SDNs cannot use U.S. banks pursuant to the OFAC restrictions. U.S. banks must follow these restrictions and block transactions sent by or to sanctioned entities and SDNs. Indeed, in the months following LIMMT'S designation, U.S. correspondent banks blocked a number of LIMMT'S wire transfers. For example, on or about August 18, 2006, a South African customer sent LIMMT a payment, in the amount of \$39,790.44, to an account held by LIMMT at a bank in China

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<sup>3</sup> Prior to the Treasury Department's designation of LIMMT for its proliferation activities, the State Department had previously imposed sanctions against LIMMT in 2004 for transferring equipment and technology to Iran in violation of the Iran Nonproliferation Act of 2000. These sanctions included severe restrictions on LIMMT'S ability to contract with or receive assistance from the United States Government, and its ability to procure sensitive military and dual-use items.

(referred to hereinafter as “Chinese Bank A”) that was blocked by Citibank, N.A. in New York County, pursuant to Executive Order 13382.

In order to identify prohibited transactions, computer systems at U.S. correspondent banks screen the text and subject matter of all wire transfers. These computer systems, commonly referred to as “OFAC filters,” are designed to recognize suspicious or prohibited transactions, including inbound and outbound fund transfers involving sanctioned entities and SDNs. These financial institutions have extensive compliance systems and personnel to ensure that they do not execute transactions on behalf of any sanctioned entity or SDN. The goals of the compliance systems go beyond adherence to OFAC regulations and endeavor to protect the financial institutions from processing transactions that run contrary to their core business principles.

The OFAC filters scan wire transfer data for any reference to a sanctioned entity or SDN. If the filter identifies a sanctioned entity or SDN, the transaction is held for further review. If the U.S. bank finds that the incoming wire transfer originated from or is intended to benefit a sanctioned entity or SDN, the transfer is blocked and the funds are either captured or returned to the sending bank. In addition, the U.S. correspondent banks are required to maintain records of all OFAC violations, and to file a form with OFAC within ten days reporting the violation.

In order to deceive and bypass these OFAC filters the sanctioned entities and SDNs must falsify, or caused to be falsified, the originator and/or beneficiary information in the wire transfers. In other words, by omitting or falsifying data regarding their role as the true originators or beneficiaries, the sanctioned entities and SDNs are able to send and receive wire transfers that would otherwise be blocked or rejected by the OFAC filters. This conduct falsifies the records of the U.S. clearing banks.

### **Overt Acts**

In the course of 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:

## **LI FANG WEI and LIMMT'S Use of the Alias SINO METALLURGY AND MINMETALS CO., LTD. to Fraudulently Access the U.S. Financial System**

### *Non-Military Iranian Customer*

1. On or about November 7, 2006, LI FANG WEI informed a customer in Iran that LIMMT “has been added on BLACK LISTS of USA treasury ministry due to some business activities with your several large governmental organizations/companies,” and advised the customer that LIMMT had changed the company name to SINO METALLURGY & MINMETALS INDUSTRY CO., LTD.

### *South African Customer*

2. On or about February 15, 2007, LI FANG WEI referenced the previous blocked payment and informed LIMMT'S agent in South Africa that LIMMT had changed its English name to SINO METALLURGY & MINMETALS INDUSTRY CO., LTD., and instructed LIMMT'S agent to “remind [the South African customer] to pay the money to new account no. and new company name instead of previous company name and account no. **this is very important!!! otherwise, the money can be blocked as last time !!!!**” [emphasis in original].
3. On or about the same date, LI FANG WEI also sent an invoice on SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. letterhead to LIMMT'S agent for graphite electrodes in the amount of \$65,560.00 and directing payment to SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. at a bank in China (referred to hereinafter as “Chinese Bank B”).
4. On or about April 4, 2007, LI FANG WEI informed LIMMT'S agent in South Africa, “To our great surprise, our bank received a swift from [a South African bank] to amend the beneficiary's name from SINO to our previous company LIMMT, why? We informed you and them very clearly that the problem is not company name, but account number, the beneficiary's name: SINO METALLURGY . . . is correct . . . (previous company name is NOT valid and useless) We are worrying that after they amended the beneficiary's name from SINO to our previous company LIMMT, the money may be blocked by USA bank !!!!!!!”



5. On or about April 18, 2007, as directed by LIMMT, the South African customer sent the payment in the amount of \$65,560.00 from its account at a South African bank through Citibank, N.A., in New York County, to an account held by LIMMT in the name of SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. at Chinese Bank B.

*Brazilian Customer A*

6. On or about April 10, 2007, LI FANG WEI informed one of its Brazilian customers (referred to hereinafter as “Brazilian Customer A”) that LIMMT had changed its English name to SINO METALLURGY & MINMETALS INDUSTRY CO., LTD.
7. On or about May 2, 2007, a representative of LIMMT responded to a question from Brazilian Customer A regarding the quality of goods to be provided by SINO METALLURGY, by explaining, “[W]e are the same company (factory/people) as previous LIMMT, only difference is company’s English name has changed to new name: SINO METALLURGY & MINMETALS INDUSTRY CO., LTD, the company’s Chinese name and office, factory address, tel, fax, etc are still same as before ... so please kindly be assured of the quality, delivery time, payment will be same as before. Do NOT worry anything!”
8. On or about July 4, 2007, a representative of LIMMT sent an invoice on SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. letterhead for graphite electrodes with 4TPI nipples to Brazilian Customer A in the amount of \$29,319.27 and directing payment to SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. at Chinese Bank B.
9. On or about July 30, 2007, as directed by LIMMT, Brazilian Customer A sent the payment in the amount of \$29,319.27 from its account at a Brazilian bank (referred to hereinafter as “Brazilian Bank A”) through The Bank of New York Mellon and American Express Bank Ltd., in New York County, to an account held by LIMMT in the name of SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. at Chinese Bank B.

*Chilean Customer*

10. On or about February 9, 2007, a representative of LIMMT sent an invoice on SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. letterhead to an agent of a Chilean customer for graphite electrodes with 4TPI nipples in the amount of \$27,744.75 and directing payment to SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. at Chinese Bank B.
11. On or about February 26, 2007, in response to an inquiry by the Chilean customer's agent asking why LIMMT'S name had changed from LIMMT to DALIAN CARBON to SINO METALLURGY, LI FANG WEI explained that DALIAN CARBON was unable to obtain a special export license for graphite electrodes, therefore, SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. obtained the license.
12. On or about March 23, 2007, as directed by LIMMT, the Chilean customer sent payment in the amount of \$13,872.38 (half the invoice amount) from its account at a Chilean bank through Wachovia Bank N.A. and American Express Bank Ltd., in New York County, to the account held by LIMMT in the name of SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. at Chinese Bank B.
13. On or about August 29, 2007, as directed by LIMMT, the Chilean customer sent the remaining payment of \$13,872.37 from its account at the Chilean bank through American Express Bank Ltd., in New York County, to the account held by LIMMT in the name of SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. at Chinese Bank B.

**LI FANG WEI and LIMMT'S Use of the Alias BLUE SKY INDUSTRY CORPORATION to Fraudulently Access the U.S. Financial System and LI FANG WEI and LIMMT'S Use of BLUE SKY INDUSTRY CORPORATION/SC (DALIAN) INDUSTRY & TRADE CO., LTD. to Transact with Iranian Entities**

*Brazilian Customer B*

14. On or about August 28, 2007, LI FANG WEI informed another Brazilian customer (referred to hereinafter as "Brazilian Customer B"), "Our company's English name has changed from LIMMT DALIAN METALLURGY & MINERALS CO., LTD. to SINO METALLURGY & MINMETALS INDUSTRY

- CO., LTD. and DALIAN CARBON CO., LTD. is our own factory which produces Graphite Electrodes and other Graphite & Carbon materials and products.”
15. On or about September 4, 2007, a representative of LIMMT sent an invoice to Brazilian Customer B on SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. letterhead for graphite electrodes with 4TPI nipples in the amount of \$30,623.35 and directing payment to SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. at Chinese Bank B.
  16. On or about September 6, 2007, as directed by LIMMT, Brazilian Customer B sent the payment of \$30,623.35 from its account at a Brazilian bank (referred to hereinafter as “Brazilian Bank B”) to an account held by LIMMT in the name of SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. at Chinese Bank B.<sup>4</sup>
  17. On or about September 16, 2007, in response to information from Brazilian Customer B that its payment to SINO METALLURGY & MINMETALS INDUSTRY CO., LTD. was rejected by Wachovia Bank, N.A. in New York County, LI FANG WEI informed Brazilian Customer B, “You are kindly required NOT to inform our following previous Tel, fax no. and e-mail address to U.S. bank or U.S. Treasury Department: Tel: [redacted], Fax: [redacted], e-mail: limmt@online.ln.cn . . . anyhow, what you should do is let them know that SINO METALLURGY & MINERALS INDUSTRY CO., LTD is a company who is NOT related to LIMMT company and any other Company on the Specially Designated National (SDN) list of U.S Department of Treasury’s Office of Foreign Assets Control (OFAC).”
  18. On or about September 19, 2007, LI FANG WEI directed Brazilian Customer B to send the payment to a U.S. dollar account held in the name BLUE SKY INDUSTRY CORPORATION at a different Chinese bank (referred to hereinafter as “Chinese Bank C”).

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<sup>4</sup> Wachovia Bank, N.A. in New York County, rejected this payment and returned the funds to Brazilian Bank B because of Wachovia Bank, N.A.’s suspicion that SINO METALLURGY & MINMETALS CO., LTD was an alias of LIMMT.

19. On or about October 24, 2007, as directed by LIMMT, Brazilian Customer B sent the payment in the amount of \$30,623.35 from its account at Brazilian Bank B through The Bank of New York Mellon and JPMorgan Chase & Co., in New York County, to an account held by LIMMT in the name of BLUE SKY INDUSTRY CORPORATION at Chinese Bank C.

*Khorasan Metallurgy Industries*

20. On or about October 4, 2007, LI FANG WEI provided to an agent of Khorasan Metallurgy Industries,<sup>5</sup> a subsidiary of the DIO in Iran, the account information for a Euro account held by LIMMT in the name of BLUE SKY INDUSTRY CORPORATION at Chinese Bank C.

21. On or about that date, LI FANG WEI asked whether Khorasan had transferred payment for a prior shipment of 8 pieces of steel plates.

22. On or about October 12, 2007, LI FANG WEI sent a letter on SC (DALIAN) INDUSTRY & TRADE CO., LTD. letterhead to Khorasan Metallurgy Industries directing payment to a Euro account held by LIMMT in the name of BLUE SKY INDUSTRY CORPORATION at Chinese Bank C, to pay for the 8 pieces of steel plates.

23. On or about November 8, 2007, LI FANG WEI acknowledged receipt of payment for the 8 pieces of steel plates.

*Amin Industrial Complex*

24. On or about June 16, 2008, LI FANG WEI sent an agent of Amin Industrial Complex,<sup>6</sup> a subsidiary of the DIO in Iran, an invoice on SC (DALIAN) INDUSTRY AND TRADE CO., LTD. letterhead for 24,500 kilograms of maraging steel rods<sup>7</sup> for more than €1,440,000.00.

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<sup>5</sup> On March 3, 2008, Khorasan Metallurgy Industries was designated by the United Nations pursuant to Security Council Resolution 1803 for its involvement in the production of centrifuge components.

<sup>6</sup> In 2008, Amin Industrial Complex had the same agent as Khorasan Metallurgy Industries and shared the same address, phone number and fax number as Khorasan Metallurgy Industries.

<sup>7</sup> This maraging steel, in the dimensions and DIN grade specified in this particular invoice, is controlled for export internationally by the Nuclear Supplier's Group.

25. On or about July 23, 2008, the same agent of Amin Industrial Complex acknowledged that Amin Industrial Complex had paid 50 percent of the purchase price of the maraging steel rods in advance of shipment.

*Shahid Sayyade Shirazi Industries*

26. On or about December 20, 2006, a representative of LIMMT asked an agent of Shahid Sayyade Shirazi Industries, a subsidiary of the DIO in Iran, whether he should send a new invoice to Sazemane Sanaye Defa directly.
27. On or about December 22, 2006, a representative of LIMMT sent an agent of Shahid Sayyade Shirazi Industries an invoice on SC (DALIAN) INDUSTRY AND TRADE CO., LTD. letterhead, addressed to Yazd Metallurgy Industries, a subsidiary of the Iranian Defense Industries Organization, for 200 metric tons of high power graphite electrodes in the amount of €20,400.
28. On or about December 24, 2006, a representative of LIMMT sent an invoice on SC (DALIAN) INDUSTRY AND TRADE CO., LTD. letterhead to Shahid Sayyade Shirazi Industries for the freight charges relating to the same transaction for 200 metric tons of high power graphite electrodes and directing payment to the Euro account held by LIMMT in the name of SC (DALIAN) INDUSTRY AND TRADE CO., LTD. at Chinese Bank C (to the same account number as directed for BLUE SKY INDUSTRY CORPORATION, as set forth in overt act number 23).
29. On or about January 10, 2007, LI FANG WEI wrote to an agent of Shahid Sayyade Shirazi Industries that LIMMT'S name had changed to SC (DALIAN) INDUSTRY AND TRADE CO., LTD., and went on to explain that it was still "the same company as previous LIMMT (DALIAN) METALLURGY & MINERALS CO., LTD."
30. On or about January 10, 2007, LI FANG WEI also sent a copy of a press release dated January 9, 2007, from the United States Department of the Treasury entitled "Iran Bank Sepah Designated by Treasury - Sepah Facilitating Iran's Weapons Program."
31. On or about January 10, 2007, LI FANG WEI corresponded with an agent of Shahid Sayyade Shirazi Industries, stating "For your attention, referring to

- attached two pages, kindly note that The Department of the Treasury designated Bank Sepah, Iran and all offices worldwide and BANK SEPAH INTERNATIONAL PLC LONDON. As you know, the L/C for our shipment was issued by Bank Sepah and reimbursing bank is BANK SEPAH INTERNATIONAL PLC LONDON, so we are worrying the payment may be blocked by USA or UK government through their Bank/Treasury system, you are kindly required to consider the matter and check carefully and seriously with Bank Sepah if the payment can be effected safely under current situation, you should be responsible for the payment should finally be received by us safely.”
32. On or about February 15, 2007, a representative of LIMMT acknowledged payment from Shahid Sayyade Shirazi Industries for the shipment of high power graphite electrodes.
  33. On or about April 9, 2007, LI FANG WEI sent an invoice on SC (DALIAN) INDUSTRY AND TRADE CO., LTD. letterhead to an agent of Shahid Sayyade Shirazi Industries confirming the sale of 450 metric tons of furnace electrodes with 4TPI nipples.
  34. On or about August 29, 2007, LI FANG WEI confirmed to an agent of Shahid Sayyade Shirazi Industries that a portion of the furnace electrodes cargo had been shipped by SC (DALIAN) INDUSTRY AND TRADE CO., LTD., and was expected to arrive in Iran on August 30, 2007.
  35. On or about September 1, 2007, LI FANG WEI informed an agent of Shahid Sayyade Shirazi Industries that the reference to a company called “Rwiot” as the buyer on the shipping paperwork for the furnace electrodes sent by LIMMT was a fictitious name to ensure the shipment was not blocked: “Kindly be informed that RWIOT STEEL SERVICE is NOT a real company name, but a false name. If we mentioned your company name, we worried that the shipment might be blocked by USA. For your information, recently we have sent cargo to one of your subsidiaries in Mashad through the same way, they have cleared the cargo and paid for us without any problem.”
  36. On or about September 15, 2007, LI FANG WEI wrote to an agent of Shahid Sayyade Shirazi Industries, “Please urgently be informed that YOU are kin[d]ly

required NOT to transfer the two payments of last two shipments to the beneficiary name and account we mentioned in the commercial invoices, the reason is the beneficiary name and account no. might have just been added to the Black Lists of USA, in this case, the money can be blocked, we shall inform you another new beneficiary name and account no early next week, then you transfer the money.”

**LI FANG WEI and LIMMT’S Use of an Account Held by Sunny Minerals Company Limited to Fraudulently Access the U.S. Financial System and Transact with Iranian Entities**

*Polish Customer*

37. On or about November 27, 2006, LI FANG WEI instructed a Polish customer that LIMMT had changed its name, and that payments to LIMMT should be sent to an account held in the name of Sunny Minerals Company Limited at another Chinese bank (referred to hereinafter as “Chinese Bank D”).
38. On or about December 1, 2006, LI FANG WEI sent an invoice to the Polish customer on Sunny Minerals Company Limited letterhead for graphite electrodes with 4TPI nipples in the amount of \$32,999.75.
39. On or about December 8, 2006, as directed by LIMMT, the Polish customer sent a payment in the amount of \$32,999.75 from its account at a Polish bank through American Express Bank Ltd., in New York County, to the account held by Sunny Minerals Company Limited at Chinese Bank D.

*Aban Commercial and Industrial Co.*

40. On or about November 27, 2006, LI FANG WEI directed an agent of Aban Commercial and Industrial Co.,<sup>8</sup> to send payment for 2,000 kilograms of tungsten metal powder shipped from LIMMT to Aban Commercial and Industrial Co. to the same account held by Sunny Minerals Company Limited at Chinese Bank D.

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<sup>8</sup> Aban Commercial and Industrial Co. shares the same post office box number in Iran as Electro Sanam Co., an entity identified in Annex 3 of United Nations Security Council Resolution 1803 as an Iranian Aerospace Industries Organization front company involved in the Iranian ballistic missile program.

*Swedish Customer*

41. On or about December 6, 2006, a Swedish customer of LIMMT sent a payment in the amount of \$27,868.54 from a Swedish bank through The Bank of New York Mellon, in New York County, to the same account held by Sunny Minerals Company Limited at Chinese Bank D.

**LI FANG WEI and LIMMT'S Use of the Alias WEALTHY OCEAN ENTERPRISES LTD. to Fraudulently Access the U.S. Financial System and LI FANG WEI and LIMMT'S Use of WEALTHY OCEAN ENTERPRISES LTD./LIAONING INDUSTRY & TRADE CO., LTD. to Transact with Iranian Entities**

*Swedish Customer*

42. On or about January 30, 2007, LI FANG WEI informed the Swedish customer, "Please kindly be informed that our company has NOT had any change except company's English name and fax number, e-mail. Our company's Chinese name has not changed and we are still working in same place, in same office, the previous fax number and e-mail address is still being used . . ."
43. On or about February 8, 2007, a representative of LIMMT sent the Swedish customer an invoice on WEALTHY OCEAN ENTERPRISES LTD. letterhead for graphite electrodes with 4TPI nipples in the amount of \$31,085.65 and directing payment to the U.S. dollar account held in the name WEALTHY OCEAN ENTERPRISES LTD. at Chinese Bank C.
44. On or about February 21, 2007, as directed by LIMMT, the Swedish customer sent the payment of \$31,085.65 from its account at a Swedish bank through The Bank of New York Mellon, in New York County, to an account held by LIMMT in the name of WEALTHY OCEAN ENTERPRISES LTD. at Chinese Bank C.

*Polish Customer*

45. On or about February 7, 2007, LI FANG WEI directed the Polish customer to send future payments to the account held by LIMMT in the name of WEALTHY OCEAN ENTERPRISES LTD., and further assured the Polish customer that future shipments would be from the same source and of the same quality.
46. On or about February 28, 2007, as directed by LIMMT, the Polish customer sent a payment of \$32,429.25 from its account at a Polish bank through American



Express Bank Ltd., in New York County, to the account held by LIMMT in the name of WEALTHY OCEAN ENTERPRISES LTD. at Chinese Bank C.

*Aban Commercial and Industrial Co.*

47. On or about May 12, 2007, LI FANG WEI instructed an agent of Aban Commercial and Industrial Co. to send payment for a prior shipment to the Euro account held by LIMMT in the name WEALTHY OCEAN ENTERPRISES LTD. at Chinese Bank C.
48. On or about that date, LI FANG WEI confirmed that the quality of the 2,000 kilograms of tungsten metal powder previously shipped was satisfactory, and that an additional 15,000 kilograms of tungsten metal powder was waiting in port for confirmation, and also sent a product quality and weight certificate attesting to the purity of 99.97% and particle size of 5.5-6.5 $\mu$ m of the 15,000 kilograms of tungsten metal powder.<sup>9</sup>
49. On or about February 15, 2007, a representative of LIMMT sent an agent of Aban Commercial and Industrial Co. an invoice on LIAONING INDUSTRY & TRADE CO., LTD. letterhead for 200 pieces of graphite cylinders for an Electrical Discharge Machine (EDM-15)<sup>10</sup> in the amount of €89,000.
50. On or about August 13, 2007, LI FANG WEI directed an agent of Aban Commercial and Industrial Co. to send payment for the last shipment of graphite cylinders to the Euro account held by LIMMT in the name of WEALTHY OCEAN ENTERPRISES LTD. at Chinese Bank C.
51. On or about May 22, 2007, LI FANG WEI sent an agent of Aban Commercial and Industrial Co. an invoice, on LIAONING INDUSTRY & TRADE CO., LTD. letterhead, for 400 pieces of tungsten-copper alloy plates in the amount of €1,480,000.00.

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<sup>9</sup> Tungsten Metal Powder, with this purity and particle size, is controlled for export internationally by the Missile Technology Control Regime.

<sup>10</sup> Electrical Discharge Machines (EDM-15) are controlled for export by the NSG. In addition, the graphite ordered in this particular invoice is controlled for export by the MTCR.

52. On or about September 14, 2007, LI FANG WEI instructed an agent of Aban Commercial and Industrial Co. to clear the cargo for the first 100 pieces of tungsten-copper alloy plates.

**LI FANG WEI and LIMMT'S Use of the Alias ANSI METALLURGY INDUSTRY CO., LTD. to Fraudulently Access the U.S. Financial System**

*Polish Customer*

53. On or about September 6, 2007, a representative of LIMMT sent the Polish customer an invoice on WEALTHY OCEAN ENTERPRISES LTD. letterhead with the invoice number 07W0829A, for graphite electrodes with 4TPI nipples in the amount of \$33,340.62, and directing payment to the account held by LIMMT in the name of WEALTHY OCEAN ENTERPRISES LTD. at Chinese Bank C.
54. On or about September 16, 2007, LI FANG WEI wrote to the Polish customer, "Regarding the payment for invoice no. W0829A, you are kindly required NOT to transfer the money to the usual account no. we mentioned on the commercial invoice, the account has a problem at this moment, we shall inform you a new Beneficiary name and account no today or tomorrow, then you pay the new Beneficiary name and account no."
55. On or about September 27, 2007, a representative of LIMMT instructed the Polish customer, "Regarding payment for invoice 07W0829A, due to our previous account no may have a problem with U.S.A Finance and Banks system, we shall not use it ... later we shall send us you our new account no to receive the money from the invoice 07W0829A and future shipments. You are kindly requested to transfer the money to the new account no."
56. On or about October 3, 2007, as directed by LIMMT, the Polish customer sent a payment in the amount of \$33,340.62 from its account at a Polish bank through American Express Bank Ltd., in New York County, to an account held by LIMMT in the name of ANSI METALLURGY INDUSTRY CO., LTD. at another Chinese bank ("Chinese Bank E").

**LI FANG WEI and LIMMT'S Use of the Alias SUMMIT INDUSTRY CORPORATION to Fraudulently Access the U.S. Financial System**

57. On or about February 27, 2008, LIMMT sent a wire transfer in the amount of \$25,560.00 from an account held by LIMMT in the name of SUMMIT INDUSTRY CORPORATION at Chinese Bank B, through Citibank, N.A. and Bank of America, N.A., in New York County, to an account held at Bank of America, N.A. in the United States.
58. On or about September 19, 2008, LIMMT sent a wire transfer in the amount of \$2,175.00 from an account held by LIMMT in the name of SUMMIT INDUSTRY CORPORATION at Chinese Bank B through Citibank, N.A., in New York County, to an account held by LIMMT'S South African agent at his South African bank.

**Falsification of Business Records of Citibank, N.A.**

**SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 3, 2007, 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.

**THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 3, 2007, 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.

#### **FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 29, 2007, 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.

#### **FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 29, 2007, 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.

#### **SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS**

**RECORDS IN THE 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 18, 2007, 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.

#### **SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 18, 2007, 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.

#### **EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 9, 2007, 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.

#### **NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS**

**RECORDS IN THE 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 9, 2007, 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.

**TENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 22, 2007, 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.

**ELEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 22, 2007, 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.

**TWELFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 17, 2007, 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.

#### **THIRTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 17, 2007, 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.

#### **FOURTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 8, 2007, 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.

#### **FIFTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 8, 2007, 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.

#### **SIXTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 15, 2007, 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.

#### **SEVENTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 15, 2007, 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.



### **EIGHTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 19, 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 Citibank, N.A.

### **NINETEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 19, 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 Citibank, N.A. was required to make and file with the United States government.

### **TWENTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 28, 2007, 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.

**TWENTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 28, 2007, 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.

**TWENTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 29, 2007, 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.

**TWENTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 29, 2007, 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.

**TWENTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 27, 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 Citibank, N.A.

**TWENTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 27, 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 Citibank, N.A. was required to make and file with the United States government.

**Falsification of Business Records of The Bank of New York Mellon**

**TWENTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007, 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 The Bank of New York Mellon.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007 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 The Bank of New York Mellon was required to make and file with the United States government.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 30, 2007, 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 The Bank of New York Mellon.

#### **TWENTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 30, 2007, 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 The Bank of New York Mellon was required to make and file with the United States government.

#### **THIRTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 6, 2006, 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 The Bank of New York Mellon.

#### **THIRTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 6, 2006, 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 The Bank of New York Mellon was required to make and file with the United States government.

#### **THIRTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2006, 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 The Bank of New York Mellon.

#### **THIRTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2006, 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 The Bank of New York Mellon was required to make and file with the United States government.

#### **THIRTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 21, 2007, 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 The Bank of New York Mellon.

#### **THIRTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 21, 2007, 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 The Bank of New York Mellon was required to make and file with the United States government.

**THIRTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 16, 2007, 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 The Bank of New York Mellon.

**THIRTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 16, 2007, 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 The Bank of New York Mellon was required to make and file with the United States government.

**THIRTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS**

**RECORDS IN THE 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 24, 2007, 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 The Bank of New York Mellon.

**THIRTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 24, 2007, 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 The Bank of New York Mellon was required to make and file with the United States government.

**FORTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 21, 2007 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 The Bank of New York Mellon.

**FORTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS**



**RECORDS IN THE 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 21, 2007, 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 The Bank of New York Mellon was required to make and file with the United States government.

**FORTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 3, 2007, 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 The Bank of New York Mellon.

**FORTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 3, 2007, 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 The Bank of New York Mellon was required to make and file with the United States government.

**Falsification of Business Records of American Express, Ltd.**

**FORTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 31, 2007, 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 American Express Bank Ltd.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 31, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 10, 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 American Express Bank Ltd.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 10, 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 American Express Bank Ltd. was required to make and file with the United States government.

**FORTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 8, 2006, 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 American Express Bank Ltd.

**FORTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 8, 2006, 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 American Express Bank Ltd. was required to make and file with the United States government.

#### **FIFTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 10, 2007, 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 American Express Bank Ltd.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 10, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 28, 2007, 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 American Express Bank Ltd.

**FIFTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 28, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

**FIFTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007, 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 American Express Bank Ltd.

**FIFTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

**FIFTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007, 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 American Express Bank Ltd.

**FIFTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007, 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 American Express Banks Ltd. was required to make and file with the United States government.

**FIFTY-EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 2, 2007, 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 American Express Bank Ltd.

**FIFTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 2, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

**SIXTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 24, 2007, 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 American Express Bank Ltd.

**SIXTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 24, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

#### **SIXTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 29, 2007, 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 American Express Bank Ltd.

#### **SIXTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 29, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

#### **SIXTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 22, 2007, 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 American Express Bank Ltd.

**SIXTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 22, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

**SIXTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 17, 2007, 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 American Express Bank Ltd.

**SIXTY-SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 17, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 30, 2007, 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 American Express Bank Ltd.

#### **SIXTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 30, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

#### **SEVENTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 10, 2007, 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 American Express Bank Ltd.

**SEVENTY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 10, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

**SEVENTY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 14, 2007, 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 American Express Bank Ltd.

**SEVENTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS**

**RECORDS IN THE 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 14, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

**SEVENTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 3, 2007, 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 American Express Bank Ltd.

**SEVENTY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 3, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

**SEVENTY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 5, 2007, 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 American Express Bank Ltd.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 5, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 7, 2007, 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 American Express Bank Ltd.

#### **SEVENTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 7, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

#### **EIGHTIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 4, 2007, 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 American Express Bank Ltd.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 4, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 20, 2007, 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 American Express Bank Ltd.

#### **EIGHTY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 20, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

#### **EIGHTY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 11, 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 American Express Bank Ltd.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 11, 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 American Express Bank Ltd. was required to make and file with the United States government.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 18, 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 American Express Bank Ltd.

#### **EIGHTY-SEVENTH**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 18, 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 American Express Bank Ltd. was required to make and file with the United States government.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 6, 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 American Express Bank Ltd.

#### **EIGHTY-NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 6, 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 American Express Bank Ltd. was required to make and file with the United States government.

#### **NINETIETH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS**

**RECORDS IN THE 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, 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 American Express Bank Ltd.

**NINETY-FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 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 American Express Bank Ltd. was required to make and file with the United States government.

**NINETY-SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 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 American Express Bank Ltd.

**NINETY-THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS**

**RECORDS IN THE 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, 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 American Express Bank Ltd. was required to make and file with the United States government.

**NINETY-FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 8, 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 American Express Bank Ltd.

**NINETY-FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 8, 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 American Express Bank Ltd. was required to make and file with the United States government.

**NINETY-SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 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 American Express Bank Ltd.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 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 American Express Bank Ltd. was required to make and file with the United States government.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 2, 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 American Express Bank Ltd.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 2, 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 American Express Bank Ltd. was required to make and file with the United States government.

**ONE HUNDREDTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 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 American Express Bank Ltd.

**ONE HUNDRED FIRST COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 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 American Express Bank Ltd. was required to make and file with the United States government.

**ONE HUNDRED SECOND COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 16, 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 American Express Bank Ltd.

**ONE HUNDRED THIRD COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 16, 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 American Express Bank Ltd. was required to make and file with the United States government.

**ONE HUNDRED FOURTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 16, 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 American Express Bank Ltd.

**ONE HUNDRED FIFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 16, 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 American Express Bank Ltd. was required to make and file with the United States government.

**ONE HUNDRED SIXTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007, 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 American Express Bank Ltd.

**ONE HUNDRED SEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

**ONE HUNDRED EIGHTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 29, 2007, 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 American Express Bank Ltd.

**ONE HUNDRED NINTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 29, 2007, 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 American Express Bank Ltd. was required to make and file with the United States government.

**Falsification of Business Records of JPMorgan Chase & Co.**

**ONE HUNDRED TENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007, 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 ELEVENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007, 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.

#### **Falsification of Business Records of Bank of America, N.A.**

#### **ONE HUNDRED TWELFTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 29, 2007, 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.

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

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 29, 2007, 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 was required to make and file with the United States government.

**ONE HUNDRED FOURTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 27, 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.

**ONE HUNDRED FIFTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 27, 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.

**Falsification of Business Records of Wachovia, N.A.**

**ONE HUNDRED SIXTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS**

**RECORDS IN THE 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, 2007, 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, N.A.

**ONE HUNDRED SEVENTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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, 2007, 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, N.A. was required to make and file with the United States government.

**ONE HUNDRED EIGHTEENTH COUNT**

**AND THE GRAND JURY AFORESAID**, by this indictment, further accuse the defendants LIMMT and LI FANG WEI of the crime of **FALSIFYING BUSINESS RECORDS IN THE 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 6, 2007 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, N.A.

**ROBERT M. MORGENTHAU**  
District Attorney