

## UNITED STATES DISTRICT COURT

for the

District of

Columbia

UNITED STATES OF AMERICA  
V.

INNOSPEC, INC.

**JUDGMENT IN A CRIMINAL CASE**  
(For Organizational Defendants)

CASE NUMBER: 10-cr-00061

Laurence Allan Urgenson  
Defendant Organization's Attorney**FILED**

MAR 30 2010

**THE DEFENDANT ORGANIZATION:**☒ pleaded guilty to count(s) Counts 1 through 12 of the Information☐ pleaded nolo contendere to count(s) \_\_\_\_\_  
which was accepted by the court.☐ was found guilty on count(s) \_\_\_\_\_  
after a plea of not guilty.

The organizational defendant is adjudicated guilty of these offenses:

<u>Title &amp; Section</u>	<u>Nature of Offense</u>	<u>Offense Ended</u>	<u>Count</u>
18 USC 371	Conspiracy	June 2008	1
18 USC 1343 and 2	Wire Fraud	July 2003	2-6

The defendant organization is sentenced as provided in pages 2 through 10 of this judgment.☐ The defendant organization has been found not guilty on count(s) \_\_\_\_\_☐ Count(s) \_\_\_\_\_ ☐ is ☐ are dismissed on the motion of the United States.

It is ordered that the defendant organization must notify the United States attorney for this district within 30 days of any change of name, principal business address, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant organization must notify the court and United States attorney of material changes in economic circumstances.

Defendant Organization's  
Federal Employer I D No 98-0181725Defendant Organization's Principal Business Address  
220 Continental Drive, Newark, Delaware 197133/19/2010

Date of Imposition of Judgment

Ellen Segal Huvelle

Signature of Judge

Ellen Segal Huvelle

Name of Judge

U.S. District Judge

Title of Judge

3/29/10

Date

Defendant Organization's Mailing Address

same as above

(2)

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**ADDITIONAL COUNTS OF CONVICTION**

<b><u>Title &amp; Section</u></b>	<b><u>Nature of Offense</u></b>	<b><u>Offense Ended</u></b>	<b><u>Count</u></b>
15 USC 78dd-1 & 18 U	Foreign Corrupt Practices Act	January 2008	7-11
15 USC 78 m & 18 USC	Foreign Corrupt Practices Act	Around 2008	12

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### PROBATION

The defendant organization is hereby sentenced to probation for a term of :

Term of 60 months on Counts One through Twelve, concurrent.

The defendant organization shall not commit another federal, state or local crime.

If this judgment imposes a fine or a restitution obligation, it is a condition of probation that the defendant organization pay in accordance with the Schedule of Payments sheet of this judgment.

The defendant organization must comply with the standard conditions that have been adopted by this court as well as with any additional conditions on the attached page (if indicated below).

### STANDARD CONDITIONS OF SUPERVISION

- 1) within thirty days from the date of this judgment, the defendant organization shall designate an official of the organization to act as the organizations's representative and to be the primary contact with the probation officer;
- 2) the defendant organization shall answer truthfully all inquiries by the probation officer and follow the instructions of the probation officer;
- 3) the defendant organization shall notify the probation officer ten days prior to any change in principal business or mailing address;
- 4) the defendant organization shall permit a probation officer to visit the organization at any of its operating business sites;
- 5) the defendant organization shall notify the probation officer within seventy-two hours of any criminal prosecution, major civil litigation, or administrative proceeding against the organization;
- 6) the defendant organization shall not dissolve, change its name, or change the name under which it does business unless this judgment and all criminal monetary penalties imposed by this court are either fully satisfied or are equally enforceable against the defendant's successors or assignees; and
- 7) the defendant organization shall not waste, nor without permission of the probation officer, sell, assign, or transfer its assets.

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### **SPECIAL CONDITIONS OF SUPERVISION**

The corporation shall abide by the general conditions of supervision adopted by the US Probation Office. The corporation shall also comply with the following special condition:

**Corporate Monitoring** - The corporation shall retain an independent corporate monitor as set forth in Appendix D of the written Plea Agreement filed in this case. The monitor and workplan will be subject to the Probation Office and Court for approval before it's monitor and workplan can be signed off by the Department of Justice.

**Corporate Compliance Program** - The corporation shall implement and maintain a Compliance Code, which, at a minimum, satisfies all the obligations and provisions described in Attachment C of the written Plea Agreement filed in this case

**Publicize Offense** - The defendant organization shall publicize the nature of the offense, the fact of the conviction, the nature of the punishment imposed, and the steps that will be taken to prevent the recurrence of similar offenses. The defendant organization will assume the costs of notice.

**Notification to Employees** - The defendant organization shall notify its employees and shareholders of its criminal behavior and its program to prevent and detect violations of law as soon as reasonably possible. Such notice shall be in a form prescribed by the Department of Justice.

IT IS ORDERED that INNOSPEC INC., shall pay a fine in the amount of \$14,100,000 on Counts One through Twelve. The fine shall be paid in five fixed installments as follow:

- 1) payment of \$3,100,000 within 30 days of imposition of sentence;
- 2) payment of \$1,000,000 on or before December 31, 2010;
- 3) payment of \$1,000,000 before December 31, 2011;
- 4) payment of \$875,000 on or before December 31, 2012; and
- 5) payment of \$1,725,000 on or before December 31, 2013.

In addition to the fixed installments, on or before December 31st of each year beginning with December 31, 2010, the defendant corporation shall pay no less than \$2,500 per metric ton of anti-knock compound sold to the Republic of Iraq in the preceding year, until such time as payments total \$6,400,000, or the sentence in this case expires.

No tax deduction may be sought in relation to this penalty.

It is further ordered that INNOSPEC INC., pay a special assessment of \$4,800. The special assessment is due no later than next Friday.

DEFENDANT ORGANIZATION: INNOSPEC, INC.  
CASE NUMBER: 10-cr-00061Judgment — Page 5 of 10**CRIMINAL MONETARY PENALTIES**

The defendant organization must pay the following total criminal monetary penalties under the schedule of payments on Sheet 4.

	<u>Assessment</u>	<u>Fine</u>	<u>Restitution</u>
<b>TOTALS</b>	\$ 4,800.00	\$ 14,100,000.00	\$

- ☐ The determination of restitution is deferred until \_\_\_\_\_. An *Amended Judgment in a Criminal Case* (AO 245C) will be entered after such determination.
- ☐ The defendant organization shall make restitution (including community restitution) to the following payees in the amount listed below.

If the defendant organization makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

<u>Name of Payee</u>	<u>Total Loss*</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
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<b>TOTALS</b>	\$	0.00	\$	0.00
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- ☐ Restitution amount ordered pursuant to plea agreement \$ \_\_\_\_\_
- ☒ The defendant organization shall pay interest on restitution or a fine of more than \$2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 4 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).
- ☐ The court determined that the defendant organization does not have the ability to pay interest, and it is ordered that:
- ☐ the interest requirement is waived for the ☐ fine ☐ restitution.
- ☐ the interest requirement for the ☐ fine ☐ restitution is modified as follows:

\* Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

DEFENDANT ORGANIZATION: INNOSPEC, INC.  
CASE NUMBER: 10-cr-00061Judgment — Page 6 of 10**SCHEDULE OF PAYMENTS**

Having assessed the organization's ability to pay, payment of the total criminal monetary penalties are due as follows:

- A ☒ Lump sum payment of \$ 4,800.00 due immediately, balance due
- ☒ not later than 3/26/2010, or
- ☐ in accordance with ☐ C or ☐ D below; or
- B ☐ Payment to begin immediately (may be combined with ☐ C or ☐ D below); or
- C ☐ Payment in \_\_\_\_\_ (e.g., equal, weekly, monthly, quarterly) installments of \$ \_\_\_\_\_ over a period of \_\_\_\_\_ (e.g., months or years), to commence \_\_\_\_\_ (e.g., 30 or 60 days) after the date of this judgment; or
- D ☐ Special instructions regarding the payment of criminal monetary penalties:

All criminal monetary penalties are made to the clerk of the court.

The defendant organization shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

☐ Joint and Several

Defendant and Co-Defendant Names and Case Numbers (including defendant number), Total Amount, Joint and Several Amount, and corresponding payee, if appropriate.

- ☐ The defendant organization shall pay the cost of prosecution.
- ☐ The defendant organization shall pay the following court cost(s):
- ☐ The defendant organization shall forfeit the defendant organization's interest in the following property to the United States:

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) fine principal, (5) fine interest, (6) community restitution, (7) penalties, and (8) costs, including cost of prosecution and court costs.