

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 24-10200
	)	
v.	)	Violations:
	)	
(1) SAMY FADI KHOUADJA,	)	<u>Count One:</u> Conspiracy to Commit Securities
(2) EAMMA SAFI,	)	Fraud
a/k/a "TT,"	)	(18 U.S.C. § 1349)
a/k/a "Yummy,"	)	
a/k/a "Situation Packered,"	)	<u>Count Two:</u> Conspiracy to Commit Securities
a/k/a "Roman Kna,"	)	Fraud
(3) ZHI GE,	)	(18 U.S.C. § 371)
a/k/a "Josh Ge,"	)	
a/k/a "Josh Gez,"	)	<u>Count Three:</u> Securities Fraud; Aiding and
a/k/a "Jay Gat,"	)	Abetting
(4) CHRISTOPHE DONG,	)	(18 U.S.C. §§ 1348 and 2)
(5) JULIEN LIU,	)	
(6) PATRICK CHOU,	)	<u>Count Four:</u> Securities Fraud; Aiding and
(7) CHEUK YUE LEE,	)	Abetting
a/k/a "Ryan,"	)	(15 U.S.C. §§ 78j(b) and 78ff(a); 17 C.F.R.
a/k/a "m100," and	)	§ 240.10b-5; 18 U.S.C. § 2)
(8) DEV ANANTH DURAI,	)	
a/k/a "Devah,"	)	<u>Count Five:</u> Money Laundering Conspiracy
	)	(18 U.S.C. § 1956(h))
	)	
Defendants	)	<u>Count Six:</u> Money Laundering; Aiding and
	)	Abetting
	)	(18 U.S.C. §§ 1956(a)(1)(B)(i) and 2)
	)	
	)	<u>Forfeiture Allegation:</u>
	)	(18 U.S.C. § 981(a)(1)(C) and
	)	28 U.S.C. § 2461(c))
	)	
	)	<u>Money Laundering Forfeiture Allegation:</u>
	)	(18 U.S.C. § 982(a)(1))
	)	

SUPERSEDING INDICTMENT

At all times relevant to this Indictment:

General Allegations

1. Defendant SAMY FADI KHOUADJA lived in France and the United Arab Emirates. KHOUADJA previously worked as an investment banker in France.
2. Defendant EAMMA SAFI, also known as “TT,” also known as “Yummy,” also known as “Situatie Packered,” also known as “Roman Kna,” lived in the United Arab Emirates and Germany. SAFI shared ownership with KHOUADJA in a restaurant in Paris, France.
3. Defendant ZHI GE, also known as “Josh Ge,” also known as “Josh Gez,” also known as “Jay Gat,” lived in Singapore.
4. Defendant CHRISTOPHE DONG lived in France.
5. Defendant JULIEN LIU lived in France and Hong Kong.
6. Defendant PATRICK CHOU lived in France and Hong Kong.
7. Defendant CHEUK YUE LEE, also known as “Ryan,” also known as “m100,” lived in Hong Kong.
8. Defendant DEV ANANTH DURAI, also known as “Devah,” lived in Singapore.
9. CC-1 lived in the United States and the Czech Republic.
10. CC-2 lived in France and worked in the mergers and acquisitions department of two publicly traded companies, Atos S.E. and Worldline S.A. CC-2 was an investor in the restaurant owned by SAFI and KHOUADJA, and previously, CC-2 worked for the same investment bank in France as KHOUADJA.
11. CC-3 lived in the United Arab Emirates and the United States.
12. CC-4 lived in Singapore.
13. CC-5 lived in Singapore.

14. CC-6 lived in Malaysia.
15. CC-7 lived in Singapore.
16. CC-8 lived in Singapore.
17. CC-9 lived in Singapore.
18. CC-10 lived in Singapore.
19. CC-11 lived in Singapore.
20. CC-12 lived in Singapore.
21. Individual 1 lived in Florida and was a close relative of CC-1.
22. Individual 2 was CC-1's girlfriend and, for a period of time, his spouse, and lived in the Czech Republic.
23. Individual 3 was CC-1's friend and lived in California.
24. Individual 4 was a close relative of GE and lived in Singapore and Hong Kong.
25. Individual 5 lived in Thailand.
26. Individual 6 lived in New York.
27. Individual 7 lived in Hong Kong.
28. Individual 8 lived in Singapore.
29. The Advisory Board Company ("ABCO") was a research, technology, and consulting healthcare business that, at relevant times, traded on the New York Stock Exchange ("NYSE") under the ticker symbol ABCO.
30. Alexion Pharmaceuticals Inc. ("Alexion") was a biopharmaceutical company headquartered in Boston, Massachusetts, that, at relevant times, traded on the NASDAQ Stock Market ("NASDAQ") under the ticker symbol ALXN.

31. Atos S.E. (“Atos”) was an information technology company headquartered in France with offices worldwide. At relevant times, Atos traded on the Paris Stock Exchange under the ticker symbol ATO, and its American depositary receipts (“ADRs”) traded on the over-the-counter market in the United States under the ticker symbol AEXAY.¹

32. Cytokinetics, Inc. (“Cytokinetics”) was a biotechnology company that, at relevant times, traded on the NASDAQ under the ticker symbol CYTK.

33. Gemalto N.V. (“Gemalto”) was an international digital security company. At relevant times, Gemalto traded on the Euronext N.V., under the ticker symbol GTOMY.

34. Ingenico Group S.A. (“Ingenico”) was a French merchant services technology company that, at relevant times, traded on the Paris Stock Exchange under the ticker symbol INGC. Ingenico’s ADRs traded on the over-the-counter market in the United States under the ticker symbol INGIY.

35. Kindred Healthcare, Inc. (“Kindred”) was a specialty hospital company that, at relevant times, traded on the NYSE under the ticker symbol KND.

36. Medidata Solutions (“Medidata”) was an American technology company that, at relevant times, traded on the NYSE under the ticker symbol MDSO.

37. MorphoSys A.G. (“MorphoSys”) was a biotechnology company that, at relevant times, had a U.S. wholly-owned subsidiary MorphoSys US Inc., which was headquartered in Boston, Massachusetts. At relevant times, MorphoSys traded on the NASDAQ under the ticker symbol MOR.

¹ ADRs are U.S. dollar-denominated certificates that trade on American stock exchanges and track the price of a foreign company’s domestic shares.

38. Pinnacle Foods, Inc. (“Pinnacle”) was a packaged foods company that, at relevant times, traded on the NYSE under the ticker symbol PF.

39. Principia Biopharma Inc. (“Principia”) was a biopharmaceutical company that, at relevant times, traded on the NASDAQ under the ticker symbol PRNB.

40. Syntel, Inc. (“Syntel”) was a multinational provider of integrated technology and business services that, at relevant times, traded on the NASDAQ under the ticker symbol SYNT.

41. Tiffany & Co. (“Tiffany”) was a jewelry retailer that, at relevant times, traded on the NYSE under the ticker symbol TIF.

42. Wright Medical Group, N.V. (“Wright Medical”) was a medical device company that, at relevant times, traded on the NYSE under the ticker symbol WMGI.

43. Walgreens Boots Alliance, Inc. (“Walgreens”) was a multinational holding company that owned the retail pharmacy chains Walgreens in the United States and Boots in the United Kingdom. At relevant times, Walgreens traded on the NYSE under the ticker symbol WBA.

44. Alexion, Cytokinetics, Kindred, Medidata, Pinnacle, Principia, Syntel, Tiffany, Wright Medical, and Walgreens were issuers that each had a class of securities registered under Section 12 of the Securities Exchange Act of 1934.

Overview of the Securities Fraud Conspiracies and the Scheme to Defraud

45. Beginning no later than in or about November 2016 and continuing through at least in or about February 2024, KHOUADJA, SAFI, GE, DONG, LIU, CHOU, DURAI, LEE, CC-1, CC-2, and CC-3 conspired with each other, and with others known and unknown to the Grand Jury, to engage in an insider trading scheme by obtaining material non-public information (“MNPI”) about the financial performance and merger-and-acquisition activity of various

publicly-traded companies, including from CC-2, executing securities trades while in possession of that MNPI, and providing that MNPI, in exchange for a percentage of trading profits, to others known and unknown, who traded while in possession of that MNPI.

Object and Purposes of the Securities Fraud Conspiracies

46. The object of the conspiracies was to commit securities fraud by trading in the securities of various companies while in possession of and on the basis of MNPI about those companies. The principal purposes of the conspiracies were to make money and to conceal the conspirators' actions from others, including regulators and law enforcement.

Manner and Means of the Securities Fraud Conspiracies

47. Among the manner and means by which KHOUADJA, SAFI, GE, DONG, LIU, CHOU, DURAI, LEE, CC-1, CC-2, CC-3, and others known and unknown to the Grand Jury carried out the conspiracies and the scheme to defraud were the following:

- a. Recruiting investment bankers and other corporate insiders, such as CC-2, who had access to MNPI about the financial performance and merger-and-acquisition activity of publicly traded companies and were willing to share that MNPI, in violation of the duties of trust and confidence the bankers and insiders owed to the sources of the information, or that the sources owed to the companies;
- b. Obtaining MNPI about publicly traded companies and sharing it with each other, and with others known and unknown to the Grand Jury;
- c. Recruiting individuals who agreed to trade in the securities of various public companies based on MNPI, including by providing free "samples" of MNPI

to them to encourage them to join the conspiracies and thereafter to share in the profits generated by their insider trading;

- d. Trading in the securities of those companies while in possession of MNPI about them, including by trading in brokerage accounts in their own names, the names of corporate entities they controlled, the names of family members and associates, and by providing the MNPI to co-conspirators to trade on their behalf;
- e. Leaking MNPI to journalists and news outlets in order to profit on securities trades following the publication of that information; and
- f. Taking steps to conceal the insider trading scheme from regulators, law enforcement, and others, including by communicating about the MNPI in person, using prepaid or “burner” cell phones and frequently changing SIM cards, and using coded language and encrypted messaging applications.

Overt Acts in Furtherance of the Securities Fraud Conspiracies and the Scheme to Defraud

48. Beginning no later than in or about November 2016 and continuing through at least in or about February 2024, KHOUADJA, SAFI, GE, DONG, LIU, CHOU, DURAI, and LEE, together with others known and unknown to the Grand Jury, committed and caused to be committed the following overt acts, among others, in furtherance of the conspiracies and the scheme to defraud.

KHOUADJA and SAFI Recruit GE

49. Beginning in or around November 2016, SAFI and KHOUADJA recruited GE to join the insider trading scheme. On or about November 17, 2016, SAFI sent a Facebook message to GE: “Since [KHOUADJA’s first name] wants to see you this Friday. Plan would be lunch and

in the evening drinks.”² Later, on or about the same day, SAFI sent another message to GE: “Friday you will be welcomed to our world of business.”

50. On or about November 19, 2016, GE met with KHOUADJA and SAFI at the restaurant owned by KHOUADJA and SAFI, and in which CC-2 was an investor.

51. Later, on or about the same day, GE and SAFI exchanged the following coded messages, in which they used the terms “socks” and “shoes” to refer to SIM cards and cellular phones, the term “greens” to refer to money, and the term “running” to refer to insider trading:

SAFI:	Hi bro
SAFI:	Just arrived home
GE:	All good
SAFI:	Did you get the shoes with the socks?
GE:	Yeah
GE:	1 shoe
GE:	I didn’t get my greens tho hahahahhaah?
GE:	But its all cool our friend and I have an understanding
SAFI:	Is that shoe good for running?
SAFI:	Can you run against 5-8 guys with it?
SAFI:	The greens you will pick up next time you come before the Trop
SAFI:	Trip
SAFI:	But we have a [clapping hands emoji] on that

² Unless otherwise noted, all capitalization, typographical, and spelling errors herein are set forth as they appear in the original messages.

GE: OK

GE: Yeah can run

GE Recruits Co-Conspirators, and Banvit

52. On or about the same day, November 19, 2016, GE began to recruit additional traders to the scheme. For example, GE sent CC-4 the following message: “Bro got a serious business opportunity to talk about. If you’re down for a serious talk I’m willing to fly back to discuss. Its pretty sensitive but huge upside.”

53. That same day, GE began providing others with MNPI from SAFI about the planned acquisition of Banvit S.A., a Turkish poultry-processing company that traded on the Istanbul Stock Exchange, by BRF S.A. (“BRFS”), a Brazilian food-processing company. The deal was not publicly announced until in or about January 2017.

54. Later that same day, GE sent CC-4 the following messages about the forthcoming Banvit transaction: “You can choose to watch and we can play on the next one if you see my resources are credible,” and “I’ll have to meet you in person to talk.” GE also advised CC-4: “Trust me I think this is one of those deals you were waiting for,” and “I’ll give you a call from a secure line tomorrow | I’ll let you know when exactly when I know.”

55. On or about November 20, 2016, approximately one day after GE’s meeting at the restaurant with SAFI and KHOUADJA, GE and SAFI engaged in the following coded exchange about recruiting other co-conspirators to the scheme:

GE: Already raced against one guy he’s happy with the way I run

SAFI: Wow

SAFI: Business business business

GE: Eamma [CC-11] insists on whatsapp lol

GE:	Haven't told him shit
GE:	He's calling me now
GE:	Just ran with the black guy looks good just 3-4 more guys to go
SAFI:	Wow
SAFI:	Sounds awesome
GE:	This shit is easier than I thought
GE:	Everyone knows what's up lol
SAFI:	I told you
SAFI:	Everybody will start sucking your d***
GE:	I thought peeps are gonna be more apprehensive
SAFI:	No

56. On or about November 21, 2016, GE sent SAFI the following messages about changing the SIM cards in his phone in order to keep their scheme secret, and about recruiting additional traders: "btw mysocks doesn't work in milan. i think only in paris can you call [KHOUADJA's first name] to check? | otherwise ill try to get a new sock in milan and throw away this one | also, I'm approaching a bunch more people."

57. On or about the same day, GE sent the following message to CC-7, whom GE was recruiting to join the insider trading scheme: "anyway about the phone convo. It's about some information but it's sensitive but it's pretty big. Trade related. I'll call you on a secure line."

58. On or about the same day, November 21, 2016, SAFI and GE exchanged the following coded messages about using burner phones and swapping SIM cards when discussing the scheme and recruiting co-conspirators:

SAFI: So just get your shoes clean for [Individual 4's] friend

GE: yeah

GE: im getting

SAFI: And get the other socks

SAFI: Out

GE: yep

GE: you think i need a new shoe?

GE: or same shoe is fine but new socks

GE: Hk is gonna watch the race

SAFI: Who is Hk?

SAFI: But new socks and shoes is a must bro

GE: both socks and shoes?

GE: you sure?

GE: idk where i can get shoes in paris

SAFI: Yes

GE: cant get just socks?

SAFI: Because that's the major mistake people do

SAFI: Btw

GE: because [KHOUADJA's first name] told me its fine

SAFI: You aren't in Milan?

SAFI: Ok if he said

GE: im in milan

GE: ask him again

SAFI: But usually try to frequently change
GE: ill change after every game okay?
SAFI: Because if you will be trapped with the shoe in a new
sock
SAFI: They will find the other socks as well
GE: same enough?
GE: ook
GE: safe
SAFI: You can do it this time
GE: ok
SAFI: But try to stick to the other method
GE: ok ill throw away my shoe this time too i guess

59. On or about the same day, SAFI and GE exchanged the following messages about recruiting CC-7 to the scheme:

SAFI: is this Guy liquid?
GE: yes
GE: lol
GE: hes a trader
GE: he started by trading energy futures
SAFI: Ok
SAFI: Then I am sure
SAFI: He will suck your d***

SAFI: 100% he will start sucking you instantly

SAFI: Like most people will do in future

GE: yeah ill work it out

SAFI: Already running on new shoes?

GE: i think shoes is fine for now i need new socks and thats it

SAFI: Ok but why don't you get it?

SAFI: Isn't it an easy one?

GE: its the same but still dont think I need one for now ill get it after this deal

60. On or about November 24, 2016, SAFI sent GE a message telling him that GE “should invite | And onboard | More watchers | To give them appetite for the game” and “race is on the way – Check out [smiling face emoji].” GE responded by asking whether it was “safe to check with my computer? Or no,” referring to whether he could search for news about the forthcoming transaction on the internet. SAFI replied: “No better run outside.”

61. On or about the same day, SAFI sent the following message to GE about forthcoming profits from the scheme: “Millions are like 12-15 months away in worst case | 100s of k | Just few months.”

62. On or about the same day, November 24, 2016, after GE proposed to Individual 8 that GE would fly to Singapore to discuss the insider trading scheme “face to face” with him, GE and Individual 8 exchanged the following messages about the MNPI regarding the Banvit and BRFS transaction:

Individual 8: funny enough, i have a good friend who's in the brazilian poultry Business

GE: haha nice

Individual 8: what was the brazilian company's name again?

GE: like i said we could talk and see if perhaps you have some friends too

GE: ill give you a call

Individual 8: k

GE: anyway look you know all you neednow. Let's see what we can do for te next deal yeh

Individual 8: alright

GE: we have to keep our communication about this low tech yeh

Individual 8: can

Individual 8: oh shit

Individual 8: the brazilian friend works for the company that you mentioned haha

GE: haha fun fun

GE: bro you really have to keep it like really really discreet about all the stuff we discussing

63. On or about December 18, 2016, GE and SAFI engaged in the following group message exchange with CC-5, whom GE and SAFI were soliciting to recruit additional traders to the scheme:

CC-5: I have got a question again... When is the acquisition will be happening ?

CC-5: In January ?

SAFI: In January I might sell shares in my restaurant [winking face emoji]

CC-5: I mean the Stock code that u just gave me.

Less than 30 seconds after CC-5 asked about the “stock code that u just gave me,” GE initiated a Facebook voice call, which lasted less than 30 seconds, to warn CC-5 that his messages about the scheme were too explicit. The group message conversation then continued:

CC-5:	Understood bro
CC-5:	Thanks a lot
GE:	All good bro
CC-5:	Should we also get a group chat on whatsapp?
CC-5:	[winking face emoji]
GE:	I have no whatsapp but you can simply Add eamma up. I'll get one asap when I'm back in milan

64. On or about the following day, December 19, 2016, CC-5 sent GE the following coded message about the MNPI regarding the Banvit and BRFS transaction, in which CC-5 advised GE that additional potential traders were “observing” the Banvit MNPI as a test, and were interested in the future in MNPI regarding American stocks: “Btw...those 2 uncles they didn't buy the chicken.... they are observing how's the chicken being cooked..... they don't like Turkish dish... they like US dishes..... and they are getting used to London and US dishes that's why.... They are now seeing the chicken as a test dish.... Let them seeing how tasty of the dish that the chief can cook.” GE responded: “thats exactky what we need you did great bro.”

65. On or about December 31, 2016, SAFI and GE engaged in the following coded message exchange in which they referred to the pending Banvit acquisition, which had not yet been publicly announced, as a “race”:

GE:	my boy [CC-7] is closed
GE:	but we need to talk numbers
GE:	the rest still watching

GE: since the race isn't over yet?

SAFI: Amazing

SAFI: Yes

SAFI: It will be over very fast

GE: as soon as it happens

SAFI: So it means my friend we are already together successful!

GE: you'll be sure the news will hit my boys

GE: and they will see

SAFI: So amazing

GE: lol

66. On or about January 10, 2017, the day after a report by the Reuters news service that BRFS and the sovereign wealth fund of Qatar had agreed to purchase the operations of Banvit in a joint venture, GE and SAFI exchanged the following coded messages:

SAFI: Hi bro I went to sports now I am really tired the race is over finally!

GE: fycj yeah nce

SAFI: So [winking face emoji]

GE: letting all my friends know now

67. Later, on or about the same day, GE sent the following messages to CC-5 about the Banvit acquisition: "hey bro | news is out with the thing we talked about | about | you can let the uncles know and we can proceed to the next one." GE and CC-5 subsequently had the following exchange, in which GE reminded CC-5 not to be explicit about their insider trading scheme over Facebook Messenger:

CC-5: Hey bro.... sorry replying u late... been busy for whole day [two loudly crying emojis]

GE: haha alll good

GE: it's just exciting news!!

GE: your uncles would be happy now i think

GE: hahaha

CC-5: Did they make a public offer for subscribing shares from the present shareholders at \$10?

GE: yes

CC-5: it didn't reach to 10\$

CC-5: Only 9.xx\$

GE: the news is out today

GE: 6 hours ago

GE: check it now

CC-5: I looked on the google finance news, it didn't mention about public offer to subscribe shares from the present shareholders at 10

CC-5: Let me check again

GE: not yet but they announced the acquisition

CC-5: I only saw the acquisition was done

GE: thats all it takes

GE: yes

CC-5: yes

GE: thats enough

GE: it will be declared soon

GE: so its pretty much done

GE: btw lets not talk so freely on facebook hahaa

CC-5: haha

68. On or about the same day, GE and CC-5 exchanged the following messages, in which CC-5 reminded GE that he was interested in trading only American stocks:

CC-5: I have told your friend Eamma [SAFI]

CC-5: I want the US stocks rather than other countries

GE: i know

GE: we can give now

GE: but does your uncles want to play?

GE: because if they are now in the deal

GE: we will give now

CC-5: He keeps talking about his business hahaha but nevermind... I will try to ask if any prospect investor for him

GE: but they will be expected to pay out

GE: you know what i mean?

GE: we already have deals existing

CC-5: Eamma talked about his tech company haha

GE: yeah i understand

GE: let me give you a call later

CC-5: Sounds like he has no interest to talk about stock

CC-5: Haha

GE: he does

GE: but not over facebook

GE: haha

CC-5: Okay sure haha

GE: bro we would make bank on this

GE: this one was just to show them

GE: now they see me and you are for real

GE: they will put money down and make money

CC-5: Do they need to sign any agreements or contracts with u guys

GE: nope

GE: all trust basis

CC-5: Btw they are only interested in US or HK stock market

GE: i get it

CC-5: So we need to check their receipt of how many shares bought in order to calculate the % of commission

GE: bro

GE: lets not talk here

CC-5: Okay

CC-5: I will call u tmr on WeChat³

CC-5: Is that okay?

GE: ok

CC-5: [a thumbs up emoji and a winking face emoji]

GE: bro i just talked to my friend

³ WeChat is a China-based social media messaging app.

GE: he was telling you about his tech company because
lets not discuss other stuff here

GE: hahahahaha

GE: you cant get confused

CC-5: Haha lol

GE: haa

69. On or about the same day, January 10, 2017, GE exchanged the following messages with CC-11, a trader he sought to recruit to the conspiracy with MNPI about the Banvit acquisition:

GE: hey bro just to let you know the news is out with the
thing we talked about. The prophecy came true
[smiley face emoji].

GE: haha

GE: I'm sure your friend is very excited to talk to us now.

CC-11: U make the money?

GE: of course bro

CC-11: Ok

GE: but this is just one deal

GE: the sample

GE: we have a new one every two weeks

70. On or about the same day, GE sent the following message to CC-7 about the Banvit acquisition: "hey bro remember what we talked about – the news is out [smiley face emoji]. So we can start playing anytime[.]"

KHOUADJA, SAFI, and GE Recruit CC-1, and Pinnacle and Kindred

71. In or about March 2017, KHOUADJA, GE, and SAFI began to recruit CC-1 to the insider trading scheme, including by providing CC-1 with MNPI regarding the potential

acquisitions of Kindred and Pinnacle, in order to encourage CC-1 to join the scheme and to share his future insider-trading profits with GE, SAFI, KHOUADJA, and other co-conspirators.

72. On or about March 9, 2017, GE and SAFI exchanged the following messages about CC-1:

GE:	So we have hit quite a few people already
GE:	I pick things up fast don't I ahhaa
SAFI:	Yes bro you do
SAFI:	But nothing new for me I know good people
GE:	[CC-1's name].com
GE:	hes interested in racing too
GE:	me and him became quite close friends actually
GE:	like actual friend friend we hang out and chat all the time
SAFI:	Who is that guy?
GE:	hes a good friend of mine that I met here
GE:	his profile is right there
GE:	worth about 10 mil
SAFI:	Sounds great

GE:	[CC-1's first name] has an apartment in Czech
SAFI:	[winking face emoji]
GE:	so we can meet around Poland

73. On or about April 18, 2017, SAFI began to purchase shares of Kindred while in possession of MNPI.

74. On or about April 26, 2017, GE reminded CC-1 that he would not need to kick back a share of the illicit trading profits he generated from the initial “samples” of MNPI GE had provided about the forthcoming Kindred and Pinnacle mergers, telling CC-1: “btw its free you know that right,” and “you don’t need to pay us a cent for the first ones”.

75. On or about May 15, 2017, SAFI began to purchase shares of Pinnacle while in possession of MNPI.

76. On or about May 16, 2017, a brokerage account in CC-3’s name began to purchase Pinnacle securities.

77. On or about May 31, 2017, CC-1 began purchasing Pinnacle and Kindred call options while in possession of MNPI.⁴

78. On or about the same day, GE and CC-1 exchanged the following messages:

GE: check Signal⁵

GE: ;)

CC-1: Awesome I will check it out

GE: yep

GE: haha

⁴ Call options are a type of security that gives the buyer the right to buy a stock at a specified price—known as the “strike price”—within a specified timeframe. Call options provide a way of profiting from the near-term appreciation of a stock’s price, but such options are worthless if the stock’s price does not appreciate beyond the strike price, by at least the cost of the option, by the time the option expires. An out-of-the-money call option refers to a call option for which the strike price is greater than the stock’s market price.

⁵ Signal is an encrypted messaging service.

GE: we can talk anytime here anyway

CC-1: how confident were you on that

GE: 100%

GE: :)

GE: and im giving it no strings attached

GE: but in the future when you can play with the size we are used to we can do deals together bro

CC-1: okay thank you bro I really appreciate it. It's just bad timing with my available funds.

CC-1: but I'm definitely going to do something and let you know what I did

GE: Ok

CC-1: hey I'm leaving next week for Czech Republic. Are you going to be in Europe any time in the next 5-6 weeks?

CC-1: I'm going there to have fun a bit while I manage getting my apartment there remodeled.

CC-1: and hopefully when I see you I will be thanking you for introducing me to your two friend today (:

GE: Haha for sure

79. On or about June 1, 2017, after the Reuters news service reported that Conagra Brands had approached Pinnacle to express interest in acquiring the company, GE and CC-1 exchanged the following coded messages, in which they referred to the increase in Pinnacle's stock price after the news was announced as a "party" and the stocks they traded as "girlfriends", and in which GE reminded CC-1 that he would eventually need to kick back a share of his illicit profits from future deals as a "cover charge":

GE: bro the news hit 6 hours ago

CC-1: Yeah I saw the after-hours party

CC-1: [minion celebrating GIF]

GE: Boom

GE: I hope you brought some friends to the party

GE: ;)

CC-1: It was a little bit last notice for me to bring all my friends but a few of us got into the club before it closed

CC-1: Thanks for hooking me up with your girlfriends they're pretty fucking hot

CC-1: Hey bro I know im gonna owe you one, just know I will return the favor

CC-1: Meanwhile if you have any more hot girls like that for me to tag here, hmu!

GE: yeah all good

GE: anytime bro

GE: but I told you eventually we need to take a covercharge for taking them tot the club

GE: and you know the number

GE: ;)

CC-1: Absolutely

80. On or about June 2, 2017, after CNBC reported that deal talks between Conagra and Pinnacle had terminated without a merger, CC-1 sent GE the following coded message inquiring whether he should hold onto the Pinnacle securities he had purchased: "Hey bro that one girl is being a total bitch. I spent a bunch of money on her but she isn't putting out. Should I hang

with her or dumped her now[?]"'. GE and CC-1 then exchanged the following coded messages in which they again referred to the prospective corporate merger partners as "girls" and "models":

GE: Or if youre talking about the 2 girls I introduced 2 days ago. one of them you can spend up to 70 on the other would be like 15 so when see you're spending a dollar close to that just fuck it

GE: ;)

GE: Don't worry I'm right can't believe what the news say about models you know lol they don't know shit

CC-1: right, yeah that's what I was wondering. Her emotions were really up and down after what that guy Marks said about her

CC-1: you know, what Mark said in the news

CC-1: I'll hang in there and hope to get laid then (:

81. On or about June 2, 2017, GE and CC-4 exchanged the following messages, in which GE explained that in the future, he would either use first names as a code for the names of the stocks—with the first letter of the names a reference to the stocks—or they could speak more freely on encrypted apps such as Telegram or Signal:

GE: Yo bro just wanna let you know don't worry about how voliltile the stuff I gave is today it's still good

CC-4: Yea I'm just waiting on a response

GE: Yeah great

GE: Let's meet again on Monday if possible

CC-4: Sure my guy can't find the symbol on Nasdaq

GE: which one?

GE: give me a call

CC-4: I can't now

CC-4: Inna bit

GE: ill call you

GE: its NYSE

GE: btw

GE: HAHA

CC-4: Yea Nasdaq

GE: both of them

CC-4: I'm busy at the moment

GE: okay

GE: just call me when youre free

GE: when you call me ill give you names just take the first letter of those okay?

GE: bro

GE: or can you just get telegram⁶ or signal?

GE: ill write you there

CC-4: Yea I have telegram

82. On or about June 6, 2017, GE and CC-6 exchanged the following messages, in which GE offered to explain to CC-6 how the insider trading scheme worked:

GE: I think we gave you a little tip the other day and I just wanna have a sit down to let you know how we work and how we get these tips

GE: think it's pretty attractive for you

CC-6: the stock tip?

⁶ Telegram is an encrypted instant messaging service.

CC-6: in USA

GE: yeah but better talk in person hahaha

CC-6: Pinnacle Foods

GE: yeah bro not wise to talk here

GE: let's talk in person

83. On or about June 7, 2017, a brokerage account in CC-3's name began to purchase Kindred securities.

84. On or about June 22, 2017, CC-1 sent GE a coded message inquiring whether the Pinnacle and Kindred transactions remained on track: "If those two model chicks had a change of heart, you'd let me know right?" GE responded: "Yes. All good for now bro." CC-1 responded: "cool, still just kissing for now hoping for a threesome soon [smiley face emoji]."

KHOUADJA, SAFI, and CC-1 Meet in Paris

85. On or about June 25, 2017, GE and SAFI exchanged the following messages about meeting CC-1 at the Paris restaurant to discuss CC-1's participation in the insider trading scheme:

GE: hey bro

GE: wondering if you in paris still

GE: my friend [CC-1's first name] wanna visit you guys

GE: he's down for racing

GE: btw

GE: if you're not there perhaps he can meet [KHOUADJA's first name]?

SAFI: Hi bro

SAFI: I am in Paris

SAFI: Where is he?

86. On or about June 26, 2017, GE and SAFI exchanged the following messages about arranging the meeting with CC-1 in Paris, and in which they referred to the pending Pinnacle transaction by the code name "Patricia":

GE: [CC-1's name, mis-spelled]

GE: said he would do lunch om 29th

SAFI: Ok confirmed

GE: okay time and place?

GE: hexagon?

SAFI: Tell him 1:30pm [address of restaurant owned by SAFI and KHOUADJA]

SAFI: [Name of restaurant owned by SAFI and KHOUADJA]

GE: nice

GE: yep set

GE: hes cool

GE: he's one of us

SAFI: I trust you

SAFI: Is he legit

SAFI: ?

GE: he's legit

SAFI: Ok

GE: he's not super big size but he's legit

GE: you know when someone is not super big is easier

GE: and I feel quite comfortable for everyone

SAFI: How much time you spent with him

GE: quite a lot like total in person up to 7 days

GE: but we talk tons

SAFI: Have you been to his place?

GE: nope. but I checked him out he's legit and I see this kind of things by character

SAFI: And he was watching?

GE: he's watching

SAFI: and he's playing but I told him this one he can watch or play for free

GE: he said he's playing a bit too because he trusts me

SAFI: Great

SAFI: He plays the Patricia?

GE: he got a bit nervous because he was leveraging a bit I think

GE: for patricia

SAFI: Good

GE: so he was panicking a bit there haha

SAFI: Good

87. On or about June 27, 2017, GE sent CC-1 the following coded message in which they referred to Kindred by the codename "Kelly", and discussed a delay in the company's

acquisition: “Kelly is out of our vision for like 2 weeks so we are all getting out- we can come back on guest list later.”

88. On or about the same day, GE and CC-6 engaged in the following coded exchange about the delay in Kindred’s anticipated acquisition, and again referred to Pinnacle as “Patricia”:

GE: hey bro if youre looking at the stuff I told you

GE: we are canceling our RSVP for Kelly’s party for the time being because she’s going missing for 2 weeks and no one knows her whereabouts

GE: and we like to be safe

GE: but everything else is still good

GE: anyway we planning to get back on guestlist with Kelly later

CC-6: I don’t understand what you mean by Kelly’s party bro

GE: the thing I told you about

GE: same first name

GE: :)

GE: I told you 2 names kelly and patricia

GE: patricia;s fine but kelly is missing for awhile

CC-6 ok I have been monitoring. both not moving anywhere really 4-8 weeks now

GE: yep all good we tell you the final date only you know

GE: itsa more for people to hold

89. On or about the same day, GE sent a message to CC-4 noting the delay in the Kindred transaction: “Kelly is missing for 2 weeks so my friends stopped RSVPing her partying until she comes back,” to which CC-4 responded: “yeah I’m sinking my stuff into another deal...”

90. On or about June 29, 2017, CC-1 met with SAFI and KHOUADJA at the restaurant SAFI and KHOUADJA owned in Paris to discuss CC-1's participation in the insider trading scheme.

91. Following the meeting, CC-1 and GE exchanged the following coded messages in which they discussed the fact that CC-1 would be expected to kick back 50 percent of his future insider trading profits to GE, SAFI and KHOUADJA, but that they had given him the MNPI about the Pinnacle acquisition for free:

CC-1:	Hey meeting was great. Thanks for the intro. (:
GE:	Nice
GE:	You calm you happy? Haha
CC-1:	I will be, but right now im a little behind
GE:	Haha okay
GE:	Anyway now can ask him anything and you guys have direct contact so it's easy
CC-1:	I understand the game different now so I won't make the same mistakes again.
CC-1:	What did you tell me the cover charge was?
GE:	It'll be higher than 70 which I told you originally
GE:	Way higher
GE:	Bidding war going on now
CC-1:	I meant the % for you guys
GE:	50
GE:	I told you haha
GE:	Promoters take 50% profit off the door sales

CC-1: Ok got it. I must have made up some shit in my head then, I remembered different. But no worries it works.

GE: Yep

GE: You know we have the best parties

GE: How was the food there

GE: At the restaurant

CC-1: No doubt

CC-1: Food was awesome

GE: BTW bro it's 50% but Patricia is free

GE: Bro

GE: If he told you something else there

CC-1: Definitely the best lamb i ever had.

GE: That one would be the next one and it'll be charged

CC-1: Got it.

92. On or about July 8, 2017, GE and SAFI exchanged the following coded messages in which SAFI informed GE that the Kindred acquisition was no longer happening, but the Pinnacle acquisition remained on track:

GE: Btw wondering if your friends found Kelly yet haha

GE: Just remembered some stuff I forgot to ask

GE: Im asking because the cover charge for her party is still going up so it seems like the party is still on somehow

GE: bro??

SAFI: Hi bro

SAFI: Kelly is off the table

SAFI: You should check her news

GE: ok

GE: patricia is still on yeah

GE: you wanna talk on other?

SAFI: Patricia will take longer

Advisory Board Company

93. On or about July 5, 2017, SAFI provided CC-1 with MNPI that ABCO was in discussions to be acquired, and CC-1 began to acquire ABCO securities.

94. On or about the following day, July 6, 2017, SAFI began to purchase ABCO shares while in possession of MNPI.

95. On or about July 9, 2017, three days after the Bloomberg news service published a news story reporting that UnitedHealth and the private equity firm Vista Equity Partners were nearing a deal to acquire ABCO, CC-1 and GE exchanged the following messages:

CC-1: and any chance you know when the next other party is?

CC-1: don't bug anybody about it, just curious if you knew

GE: not yet it'll take awhile I think

GE: ill sort everything out this week

CC-1: despite being late to the advisor party, I still had a nice time (:

GE: last week a bit stretch

GE: stretched

CC-1: ok no worries, I'm sure E will contact me when he has something

GE: I think my friend told you everything you ended anyway

Gemalto

96. On or about November 24, 2017, SAFI began to purchase shares of Gemalto and provided CC-1 with MNPI that Atos, where CC-2 worked at the time, planned to make a bid to acquire Gemalto.

97. On or about November 28, 2017, LIU caused a brokerage account he controlled to begin to purchase Gemalto securities while in possession of MNPI.

98. On or about the same day, November 28, 2017, a brokerage account in CC-3's name began to purchase Gemalto securities.

99. On or about November 29, 2017, CC-1 began to purchase Gemalto securities while in possession of MNPI.

100. On or about Friday, December 8, 2017, CC-1 instructed Individual 1 to purchase Gemalto shares while in possession of MNPI: "FYI, last chance to buy GTOMY before it takes off (:"

101. On or about the following Monday, December 11, 2017—after Atos publicly announced its bid for Gemalto—CC-1 removed SAFI as a friend on Facebook in an attempt to conceal their relationship.

Syntel

102. On or about June 29, 2018, CC-1 began purchasing Syntel call options after SAFI tipped him with MNPI that Atos had agreed to acquire Syntel.

103. On or about July 2, 2018, SAFI began purchasing shares of Syntel while in possession of MNPI.

104. On or about the same day, July 2, 2018, LIU caused a brokerage account he controlled to begin purchasing Syntel securities while in possession of MNPI.

105. On or about the same day, July 2, 2018, DURAI began purchasing Syntel securities while in possession of MNPI.

106. On or about July 9, 2018, SAFI sent CC-1 the following Telegram messages about the Syntel MNPI: “Leak | Will be on Thursday | Confirmed | ! | You should place accordingly your limit orders | Because article will say above 40 so it can peak up to 42 during press release | Don’t sell anything since during a leak time value won’t flatten just load your truck and try to exit accordingly to the peak on Thursday”.

107. On or about August 13, 2018, approximately three weeks after Atos announced that it had agreed to acquire Syntel, CC-1 withdrew 100,000 Euros in cash from a bank account he controlled, and, at SAFI’s direction, met SAFI in Vienna, Austria, to give him that cash as partial payment for the MNPI SAFI had provided.

108. On or about August 17, 2018, DURAI and LIU exchanged the following messages:

LIU: My friend said new deal soon

DURAI: When roughly

DURAI: I need to prepare the firepower

LIU: He just said soln [*sic*, soon]

LIU: Lol

DURAI: Haha

LIU: For next month I guess

109. On or about August 27, 2018, DURAI and CC-12 exchanged the following messages:

DURAI:	The deal I made with the guy who gives me the tip is that I give him 50% of profit
DURAI:	So he knows there is money to be made
DURAI:	He wont fck around
CC-12:	Ok good But u lie about how much u bought right That's basic strategy hahaha
DURAI:	No la
DURAI:	How to lie
DURAI:	Thats why i tell you the tip also
DURAI:	So you can buy and help me subsidize my payment to him

110. On or about August 29, 2018, DURAI and CC-12 exchanged the following messages about LIU:

CC-12:	Surely he looked into the fundamentals too no V
DURAI:	No
DURAI:	He is not a finance guy
DURAI:	Purely insider trading guy
DURAI:	He always asks me about the financial stuff
CC-12:	Ok bring me some good news soon plz [crying laughing emoji]

111. On or about Monday, October 8, 2018—after meeting with SAFI in Germany the preceding weekend—CC-1 sent a message to GE stating that he “got some good advice from our friend.”

112. On or about October 16, 2018, DURAI and LIU exchanged the following messages, in which LIU asked DURAI if LIU could send DURAI money that was insider trading proceeds,

so that DURAI could transfer the money to the restaurant owned by KHOUADJA and SAFI, through a shell company bank account in GE's name:

LIU: Hey bro I need a favor

LIU: Can I transfer u 60k€ to your sing account and u put it again in the holding of the restaurant?

LIU: The thing is I will transfer money from Europe today, and send u the prove, but the thing is they need the money asap so do u have 60k€ available to make the transfer first?

LIU: And it may arrive by Thursday or Friday to your account

DURAI: Can

DURAI: But I can only do it tomorrow

LIU: Ok thanks bro

LIU: [lists Singapore bank account information for DURAI]

LIU: I transfer to here?

DURAI: The lame thing is that when transfer within Singapore must do it in branch

DURAI: Yea sure

DURAI: Btw what is the reason you don't want to transfer direct?

LIU: I tell u Friday when I see u

113. On or about the same day, October 16, 2018, LIU sent DURAI a screenshot from "Josh Sybil Ge" containing bank account wiring information for Belleby Holdings Pte Ltd., a company GE controlled. On or about the same day, DURAI wired €60,000 to the Belleby account, and LIU executed two wires totaling that same amount to DURAI.

114. On or about the following day, October 17, 2018, LIU sent DURAI two screenshots showing two €30,000 wire transfers to DURAI. DURAI responded: “Sweet | Your guy received the money yet?”

The Atos Negative Profit Warning

115. On or about October 20, 2018, after DONG tipped CHOU with MNPI from KHOUADJA that Atos would announce a negative profit warning, CHOU attempted to enlist an individual to enter a short-term short trade in Atos securities on his behalf.

116. On or about the same day, October 20, 2018, DONG tipped DURAI with MNPI obtained from KHOUADJA regarding the Atos negative profit warning. DONG and DURAI exchanged the following messages:

DONG:	I have a good tips
DONG:	Talk to Julien
DONG:	And we talk later hahaha
...	
DONG:	I wanna send u some money if u can play a position for me 1 day long
DONG:	10%
DONG:	Lol
DONG:	Buy Monday sell Tuesday
DONG:	Go see Julien
DONG:	I was on the phone
DURAI:	Okay
DONG:	With him just now
DONG:	He will explain

DURAI: Will talk to him

117. On or about the same day, October 20, 2018, DURAI sent DONG a screenshot of Atos stock prices and asked, “you sure?”. They then exchanged the following messages:

DONG: U have to short it

DONG: It will go down 10%

DONG: On Tuesday

DURAI: I know

DONG: Apparently

118. On or about October 21, 2018, DONG sent DURAI a screenshot of Atos and a voice message, stating: “It is Tuesday morning. And I would like to buy on Monday, but I want to short it, you know, he said it’s sure, you know, so I think you can do it too.” DONG and DURAI then exchanged messages about DONG sending DURAI money so that DURAI could short Atos securities on DONG’s behalf.

119. On or about the same day, October 21, 2018, DURAI sent a voice message to DONG: “Yo, your guy 100% sure about this deal? How much you looking to short?” DONG responded in a voice message, stating: “Yeah, I see him two times, he said he’s sure,” and “he said it’s no problem...because his guy is the number 2, you know, and he said the result is not nice at all, so it will go down 10% when they show the results...”

120. On or about October 22, 2018, DURAI began purchasing Atos put options while in possession of MNPI.

121. On or about October 22, 2018, DURAI tipped CC-12 with the Atos MNPI, telling CC-12 in encrypted messages, “they announcing tomorrow before market open,” and “everything sell tomorrow”.

122. On or about October 22, 2018, DURAI and LIU exchanged messages regarding the Atos MNPI from KHOUADJA. DURAI asked LIU: “You bough[t]?” LIU responded: “Its short not buy | I didn’t even ask my dad he is in bad mood.”

123. On or about October 22, 2018, after SAFI tipped CC-1 with MNPI regarding the Atos negative profit warning obtained from KHOUADJA, CC-1 began selling short Atos contracts for difference in a brokerage account he controlled.⁷

124. On or about October 23, 2018, following the Atos announcement, DURAI messaged CC-12: “See | Don’t say I never give you winning trades | 25% in one day”. After CC-12 responded that he “didn’t go in,” DURAI responded: “I made quarter mill USD | Don’t worry next trade we make killing”.

125. On or about October 26, 2018, KHOUADJA sent DONG a Telegram message that he set to “self-destruct” (*i.e.*, auto-delete) after one hour: “Us deal 50 pc premium imminent but not much liquidity (200m usd market cap). On IG u cannot buy cfds so can only buy normal shares. No option available. Can he do it?”

126. On or about the same day, October 26, 2018, DONG sent the message from KHOUADJA, separately, to both CHOU and DURAI.

Worldline

127. On or about the same day, October 26, 2018, DONG sent a voice message to DURAI: “He send me this tip for today. Can you do me that?” DURAI responded: “I need to

⁷ Contracts for difference (“CFDs”) are a form of security that allows investors in foreign markets to participate in the price movement of stocks traded on exchanges in the United States without actually owning the underlying stocks. Short-selling is a trading strategy that seeks to profit from an anticipated decline in the price of a security. Short-selling typically involves borrowing shares of stock and selling them, in anticipation of repurchasing them later at a lower price.

check | What is the symbol | How much u wanna buy”. DONG responded by sending DURAI another series of Telegram messages that KHOUADJA had sent DONG, which translated from French, stated in sum and substance: “The source wants 50. So for you, me, and the source, you can tell him 200. | He will give me the code only if the guy is ok.” DONG responded to KHOUADJA on Telegram: “Ok 200 | of which 50 are for the source only | ?” KHOUADJA responded to DONG: “Ask if he uses interactive broker.” After DONG sent those messages between DONG and KHOUADJA to DURAI, DONG sent the following messages to DURAI: “Can u take me 200k | I send u tomorrow | He don’t want give the tips before I said yes | Lol.” After DURAI responded that he needed to transfer money into his brokerage account, DONG messaged DURAI, relaying messages from KHOUADJA: “Could be anytile [*sic*, anytime] | they are already drafting SPA | He said that”.

128. Later, on or about the same day, October 26, 2018, DONG told DURAI that he was going to meet with KHOUADJA in person to get “the tip,” because “he did not want to send it on the phone”.

129. On or about the same day, October 26, 2018, DURAI messaged LIU: “Chris [DONG] asking me to buy him some shares | Should I do it | Haha”. LIU responded: “Again? | Lol | Don’t worry | Yes | Its ok”. They then exchanged the following messages about KHOUADJA:

DURAI:	He said his friend Sam ask him to buy
DURAI:	You know this Sam?
LIU:	Yes
LIU:	Atos guy
LIU:	Only 100% thing

130. On or about October 31, 2018, DONG and DURAI exchanged messages about a non-Atos stock. DONG messaged DURAI: “I just look for Atos | Because is 1000% sure”. DURAI messaged DONG: “Is this one 1000% sure like Atos or no?” DONG responded to DURAI: “Not like Atos,” and “Because I don’t know the source personnally [*sic*, personally] | Atos I know”.

131. On or about November 26, 2018, KHOUADJA sent a self-destruct Telegram message to DONG, which translated from French, stated in relevant part in sum and substance: “Sorry, I just got some news because it was Thanksgiving,” and “For the price he will have to confirm it to me in the coming days.” DONG took a screenshot of this message and sent it to CHOU.

132. On or about December 15, 2018, DONG sent a message to CHOU: “Atos and Atos Worldline.”

133. On or about January 3, 2019, GE sent the following messages to CC-8 in an attempt to recruit him to the insider trading scheme: “[CC-9] told me a month ago that you might be interested in some investment opportunities | haha | thought perhaps we can meet. I’ve a present for you.”

134. Three days later, on or about January 6, 2019, GE and CC-8 met at GE’s residence in Singapore to discuss the scheme. After the meeting, GE and CC-8 agreed to communicate about the scheme over Telegram, in order to avoid detection of the scheme by regulators and law enforcement.

135. On or about January 7, 2019, DONG sent a message to DURAI: “Ok he told me atos tips beginning of February”.

136. On or about January 9, 2019, DONG sent CHOU a message, which translated from French, stated in relevant part in sum and substance: “I have news for Atos | Your account is ready | ?” CHOU responded affirmatively.

137. On or about January 9, 2019, GE directed CC-1 to switch to Telegram.

138. On or about the following day, January 10, 2019, GE and SAFI tipped CC-1 with MNPI that Atos planned to spin off its Worldline subsidiary, and CC-1 began to purchase Atos CFDs in a brokerage account he controlled.

139. On or about the same day, January 10, 2019, DONG sent CHOU a message instructing him to buy short-term, out-of-the-money Atos call options.

140. On or about January 14, 2019, after CC-8 did not respond to several messages, GE exchanged the following messages with CC-9, who had introduced GE to CC-8:

GE:	Hey bro can you do me a favor and give [CC-8] a call and ask him to contact me?
GE:	I’m in a deal with him will tell you more next time
CC-9:	I’m in kl bro
CC-9:	Oh is he investing?
GE:	Yeah let’s not talk here about this tho
CC-9:	I will wa him
GE:	Ok
GE:	Give me his WA number
CC-9:	[Sends a screenshot containing CC-8’s WhatsApp contact information]

141. Later, on or about the same day, CC-8 sent GE a message, “Hey bro,” to which GE responded by directing CC-8 to switch to the more secure Telegram messaging app: “Yo bro come on other.”

142. Later that same day, January 14, 2019, CC-8 began purchasing Atos call options while in possession of MNPI.

143. On or about January 16, 2019, GE and CC-8 exchanged the following messages:

CC-8: ...If this deal make me a billionaire in usd, I resign tomorrow and will be 100x more easy to reach [smiling tongue out emoji]

GE: Haha yeah

GE: Not billionaire but millionaire is possible

144. On or about January 15, 2019, CHOU caused a brokerage account in the name of an immediate family member to begin purchasing Atos securities while in possession of MNPI.

145. On or about January 16, 2019, GE sent CC-9 the following Telegram messages: “Write this down btw but on paper | Atos se | Paris stock | On 30th they will have a special dividends announcement | I already put 150k and [CC-8’s first name] put 50k into this options | So we already have 100% ROI | But by 30th will be a lot more”. In response to CC-9’s request for more information, GE sent the following messages: “The pitch is we have accurate info on 30th would have special report and it will shoot up”.

146. On or about January 18, 2019, GE exchanged the following messages with Individual 5:

GE: Bro if we can meet asap

GE: Maybe you wanna come into another deal I’m doing

Individual 5: What’s up

GE: I'll discuss with you in person
GE: Can't talk here
Individual 5: Ok
GE: I'll write you quickly on telegram

147. On or about January 21, 2019, DONG caused a family member's brokerage account to begin purchasing Atos securities while in possession of MNPI.

148. On or about January 24, 2019, DONG sent DURAI the following messages: "Play atos should be ok | He is result no 20 february but 30/1 | should make 10 | 10% | Now u know him".

149. On or about January 28, 2019—two days before the Worldline spinoff was publicly announced—GE and CC-8 engaged in the following message exchange:

GE: get ready on 30th we can be ready to cash out already
GE: [winking face emoji]
CC-8: Ready anytime bro. Haha

150. On or about the same day, GE sent the following messages to Individual 4, referring to the Worldline spinoff: "need to talk...we have a big play now...so if you can cash our all your current positions even at loss...and fund me...we can do...I new one."

151. On or about January 28, 2019, DURAI sent a message to DONG: "Atos buy before 30th?" DONG responded: "Yes before 30".

152. On or about the same day, January 28, 2019, DURAI sent CC-12 the following messages: "I got new info | Can only tell you in person | Come back to Macau tonight | I'm leaving tomm | Quick".

GE: you got the money transferred yet

CC-8: Hey bro, I initiated already, but looks like haven't received yet

GE: Nice bro

GE: Let me know when receive

GE: I gotta collect from you asap gotta pay some peeps [winking face emoji]

CC-8: Sure bro

Medidata

160. On or about February 19, 2019, after GE and SAFI tipped CC-1 with MNPI that the French company Dassault Systems had agreed to acquire Medidata, CC-1 began purchasing Medidata securities, including call options over the BOX Exchange, in Boston, Massachusetts.

161. On or about April 2, 2019, CC-1 sent a message to Individual 1 that he was "loading up the truck on Medidata."

162. On or about the following day, April 3, 2019, GE sent the following messages to CC-9 about the Medidata transaction: "lets meet soon | we need to talk soon | the play is soon just got word."

163. On or about April 5, 2019, GE sent the following messages directing CC-8 to the more secure Telegram messaging application so that he could pass on MNPI about Medidata: "Bro | Check the other app | Bro | I got something for you."

164. On or about April 26, 2019, DURAI sent a message to LIU: "When is next atos tip".

165. On or about May 3, 2019, DURAI sent a message to DONG: "No new tips?" DONG responded: "No I was waiting for Atos". Later, on or about the same day, in response to

DONG's message asking whether DURAI had any "tips", DURAI stated: "My tips are not 100% | That's why I never tell you guys".

166. On or about May 7, 2019, GE sent the following message instructing CC-8 to be prepared to purchase Medidata securities: "Yo get ready."

167. On or about the following day, May 8, 2019, CC-8 began purchasing Medidata securities while in possession of MNPI.

168. On or about May 9, 2019, DONG sent the following messages to CHOU about MNPI regarding a potential acquisition of Medidata, which translated from French, stated in sum and substance: "Offer confirmed but I don't know the price | I saw him again and he told me they were full speed by closer deal," to which CHOU responded: "Yeahhhh | Send this to telegram".

169. On or about May 14, 2019, CC-1 and GE exchanged the following messages about "Maria," a codename for Medidata:

GE:	yo bro
GE:	hows things
CC-1:	stressful bro, not having a good time right now
CC-1:	working my ass off and not enough energy to handle it all
CC-1:	Hopefully Maria will help take a little stress off next week (:
GE:	yeah bro
GE:	glad youre excited haha
GE:	[heart symbol]

170. On or about May 14, 2019, DONG caused a family member's brokerage account to begin to purchase Medidata securities while in possession of MNPI.

171. On or about May 31, 2019, GE and CC-8 exchanged the following messages about the anticipated Medidata acquisition:

CC-8:	btw our other deal still on? You know how those things behave hor?
GE:	Yes of course
GE:	Bro
GE:	Next week
GE:	Kaching
CC-8:	Haha okay
GE:	[winking face emoji]

Tiffany

172. On or about October 24, 2019, SAFI tipped CC-1 with MNPI that LVMH was planning an offer to acquire Tiffany, and SAFI and CC-1 began purchasing Tiffany securities.

173. On or about the same day, October 24, 2019—four days before Tiffany announced that it had received an acquisition proposal from LVMH—CC-1 sent the following message to Individual 3: “URGENT. Buy Tiffany Co. symbol is TIF. Load the f*ckin’ truck up.”

174. On or about October 25, 2019, DONG caused a family member’s brokerage account to begin to purchase Tiffany securities while in possession of MNPI.

175. On or about the same day, October 25, 2019, LIU began to purchase Tiffany securities while in possession of MNPI.

176. On or about October 25, 2019, CHOU sent DONG a hand-written ledger of insider trading proceeds and monetary payments, which listed “Samy” next to amounts associated with KHOUADJA.

Wright Medical

177. On or about November 1, 2019, SAFI tipped CC-1 with MNPI that Stryker was planning to acquire Wright Medical, and both SAFI and CC-1 began purchasing Wright Medical securities.

178. Later, on or about the same day, November 1, 2019, after the Bloomberg news service reported that Wright Medical was exploring a possible sale of the company, CC-1 sent the following messages to Individual 1: “I loaded you up today on Wright Medical. \$1m position. It is up another 10% now in after hours trading [5 sideways crying laughing emojis] | News out after market close that wright medical is exploring a sale. Lucky timing on my bet [winking emoji].”

179. On or about the same day, November 1, 2019, DURAI purchased Wright Medical securities while in possession of MNPI.

Walgreens

180. On or about November 4, 2019, SAFI tipped CC-1 with MNPI that Walgreens was considering a deal to take the company private, and both SAFI and CC-1 purchased Walgreens call options.

181. On or about the same day, November 4, 2019—one day before the Bloomberg news service reported that Walgreens was reviewing a potential deal to take the company private—CC-1 sent the following messages to Individual 1: “Tomorrow you will hit \$4m | Watch Walgreens.”

182. On or about the same day, November 4, 2019, LIU purchased Walgreens securities while in possession of MNPI.

183. On or about the same day, November 4, 2019, DURAI purchased Walgreens securities while in possession of MNPI.

Ingenico

184. On or about October 14, 2019, after SAFI tipped CC-1 with MNPI that Worldline planned to acquire Ingenico, CC-1 began to purchase Ingenico call options in a brokerage account he controlled.

185. Two days later, on or about October 16, 2019, CC-8 began purchasing Ingenico call options while in possession of MNPI.

186. On or about October 22, 2019, DURAI sent a message to LIU: "Pls give me some good tips". LIU responded "Telegram".

187. On or about the following day, October 23, 2019, DURAI purchased Ingenico securities while in possession of MNPI.

188. On or about October 23, 2019, SAFI purchased Ingenico securities while in possession of MNPI.

189. On or about October 26, 2019, GE sent the following messages to Individual 6 asking him to recruit additional sources of MNPI to the insider trading scheme: "did you think about the thing we talked about in nyc? | [smiling tongue out emoji] | basically I told you i need to network with some people in nyc | bankers and such and was wondering if you could introduce me | im looking for investment bankers in big banks working in M&A specifically."

190. On or about October 28, 2019, DURAI sent the following messages to CC-12: "Will your bankers think it's weird that all your recent trades are short term and are takeover targets | Can you please get your own online brokerage account".

191. On or about the same day, October 28, 2019, DURAI sent the following messages to CC-12: "Dude don't tell anyone that about our business | Esp your bro | Keep it between us".

192. On or about October 31, 2019, while instructing CC-12 to open his own online brokerage account rather than trade through his brokerage account managed by an investment bank, DURAI sent the following messages to CC-12: “You figure something la | Cannot use UBS anymore | Banks are required to declare suspicious trading activity | This is a serious matter”.

193. On or about November 15, 2019, LIU caused a brokerage account he controlled to purchase Ingenico securities while in possession of MNPI.

194. On or about December 18, 2019, GE and CC-9 exchanged the following messages about a potential trader GE hoped CC-9 would introduce to the scheme:

GE: yo bro ive a huge deal in january

GE: if your friend is ready to chat

GE: should do it sooner

GE: so we can get her on that one

CC-9: I’ll make it happen for you

GE: thanks bro

GE: \$\$\$\$

GE: tell her minimum 1m

GE: cannot lose

195. On or about December 31, 2019, DONG sent a message to CHOU, which translated from French, stated in sum and substance: “We’re waiting for the next Tiffany”.

196. On or about January 15, 2020, DONG sent a message to CHOU, which translated from French, stated in sum and substance: “Buy Ingenico shares it comes out on 2/2 125 the offer is accepted”.

197. On or about the same day, January 15, 2020, DONG caused a family member’s brokerage account to begin purchasing Ingenico securities while in possession of MNPI.

Sanofi, Alexion, and Suez

198. On or about April 14, 2020, GE and LEE exchanged the following Telegram messages, in which GE tipped LEE with MNPI from SAFI regarding the planned acquisition of Principia by Sanofi S.A.:

GE:	Partner is recommending you to deleverage
LEE:	But any colors
LEE:	Is the next deal being delayed
GE:	Yes
GE:	And no
GE:	May 4 th deal so far on track
GE:	But Sanofi is delayed 2 weeks
LEE:	So the may deal is not the sanofi deal??
GE:	No
GE:	My mistake
GE:	They both pharma
GE:	20bn deal is also medical devices
GE:	Sanofi is 100-200% upside btn
GE:	5 bil deal

199. On or about July 9, 2020—approximately seven days before Bloomberg reported that Sanofi was studying potential acquisitions of U.S. biotechnology companies, including Principia—GE and LEE began purchasing shares of Principia.

200. On or about August 18, 2020, SAFI purchased Alexion securities based on MNPI that AstraZeneca was planning to acquire Alexion for approximately \$39 billion.

201. Three days later, on or about August 21, 2020, SAFI sent the following Telegram messages to GE about the planned Alexion acquisition: “The blockbuster | is size 40bn usd | And is in the US.”

202. On or about the same day, August 21, 2020, GE and LEE began purchasing shares of Suez S.A., which traded under the ticker SEV, based on MNPI from SAFI that Veolia was planning to acquire a stake in Suez—a deal that was announced approximately nine days later.

203. On or about the same day, August 21, 2020, SAFI sent GE the following Telegram messages concerning the Suez MNPI to relay to LEE: “Bro tell him to watch atos worldline spin-off January 2019 is same kind of transaction | And we know how to calculate math is an edge when it comes to a transaction | We have done similar transactions and are experienced”.

204. Approximately two days later, on or about September 1, 2020, LEE sent GE the following Telegram messages about the pending Suez deal: “Btw total for sev is about hkd 9m | Not bad right | Yours is 4.5 m.” GE responded: “Yeh | Not bad bro | Suitcase ready hahaha.” LEE replied: “Approx 577k usd | Or 580k.”

205. On or about August 28, 2020, GE purchased Alexion securities while in possession of MNPI.

206. On or about August 31, 2020, SAFI sent GE the following Telegram messages about the Alexion deal: “Tell him is deal of the year No.1 out of 3 | Sale side auction | 200m

liquidity daily | Trading at huge discount | And market not having the info that they are on sale |
Upside on deal closing 50-60% | On this weeks leak 15-20% | Which makes 4-6x on our options.”

207. Later, on or about the same day, SAFI directed GE to “tell m100,” a code name for LEE: “It is crazy news for the market | Once the article comes | That this company is on sale . . . |
Now they are in a structured selling process | Biogen has bid 145 ...”

208. On or about the same day, LEE and GE exchanged Telegram messages about Alexion’s share price, and LEE asked: “Are you certain that the news is coming out? But won’t get canned like prnb last time?” GE responded: “Yes.” On or about the same day, LEE purchased Alexion securities while in possession of MNPI.

209. On or about August 31, 2020, DURAI began purchasing Alexion securities while in possession of MNPI.

210. On or about September 1, 2020, GE relayed a Telegram message from LEE to SAFI wanting to know “exactly when” the leak of MNPI regarding the Alexion deal would occur. SAFI responded, “Exactly that’s a good one but tell him if the leak ever comes by a bad journalist which I have to pay for a very bad deal I can tell him exactly | Until then it is plus two minus two days | So Friday | Latest Monday | Please forward.”

211. On or about the same day, September 1, 2020, GE took a screenshot of SAFI’s Telegram message and sent it to LEE. LEE responded: “So next week?” GE replied: “Friday latest Monday like we said bro.” LEE said: “Coz I was under impression like last night | Ok so we are taking market risk for next 4 days | I maxed out as you told me to | If I get cut I let you know over next few days.” GE responded: “Ok look we leaked it already last night might take some time for article to be out.”

212. Approximately two minutes later, SAFI sent the following Telegram messages to GE: “Bro tell him this one is a quality deal ... | Despite the Biogen vid | Bid | Crazy news that they are on sale | We will see multiple rival bids | please forward.”

213. Later, on or about the same day, September 1, 2020, LEE sent the following messages to GE: “Pls tell him that I do trust him just that we’re a bit levered this time as I was under the impression that it would be out within a day or 2 | So let’s just hope it works out.” In response, GE pasted a message to LEE from SAFI: “Yes I really appreciate his trust it is my honor to work with a personality like him. Tell him it is definitely [*sic*] possible that the leak might come any minute but ourselves we prefer to stay conservative and giving it until Friday latest over the weekend but on a deal like this Bloomberg and Reuters would fight for any minute earlier to have it exclusive.” LEE responded: “Ok I wouldn’t worry or even be asking at all if we aren’t that levered | I think we are ok for now let’s hope it comes out soon and market reacts | If I interpret correctly the news will have indic px from biogen?”

214. On or about September 16, 2020, GE sold more than 19,000 Alexion CFDs for proceeds of more than \$2.2 million after the online newsletter *Seeking Alpha* published an article suggesting that Biogen might be seeking to acquire Alexion, prompting Alexion’s stock price to increase.

Cytokinetics

215. On or about October 9, 2023, SAFI tipped GE with MNPI that Cytokinetics was the subject of a potential takeover, and both SAFI and GE purchased Cytokinetics call options over the BOX Exchange, in Boston, Massachusetts.

216. On or about October 12, 2023, GE sent SAFI the following Telegram message about LEE: “He said he’s ready let’s do it.” SAFI responded: “CytK | Tell him upside from here is 120% | At least 40% | We wanna exit at least ... | And revisit the deal with options.”

217. On or about the same day, LEE purchased Cytokinetics shares while in possession of MNPI.

218. On or about October 31, 2023, SAFI and GE sold nearly all of the Cytokinetics call options they had purchased after the Bloomberg news service published an article concerning the takeover interest in Cytokinetics, prompting the company’s share price to increase.

219. On or about December 12, 2023, SAFI sent GE the following messages, which GE relayed to LEE: “Is like m100 asking me in order to take our trade we should let him speak with the insider | I am his assurance...To m100 bro you can tell this kind of deals is all relationship based he wants the formal way let him go to a financial advisor”.

220. On or about December 14, 2023, LIU began to purchase Cytokinetics securities while in possession of MNPI.

221. On or about December 19, 2023, CC-3 began to purchase Cytokinetics securities while in possession of MNPI.

222. On or about Friday, January 6, 2024—two days before the Wall Street Journal reported that Novartis was in advanced discussions to acquire Cytokinetics—GE sent LEE messages via Telegram, relaying MNPI from SAFI that news about the transaction would be announced the following Monday: “Monday pre market | Tell him a strategic sell process | Has very firm timelines | Situation Packered: And owners of CytK are not amateurs is Blackrock and co | We have 12bn usd more to buy.”

223. Later the same day, LEE sent GE the following Telegram messages: “Hi bro guess nothing to do tonight? | Still on track for Mon?” GE responded, relaying MNPI from SAFI: “Bro tell Ryan | We waiting if nova | Gies higher with bid | Because if leak comes | And we know that lets say nova wins at 124 | And leak take it to 140 | We sell | Or if it takes it to 120 | We well the short leg of the 125 call | Calls.”

MorphoSys

224. On or about January 16, 2024, GE, LEE, CC-8, and LIU began to purchase MorphoSys securities while in possession of MNPI that the company would be acquired.

225. On or about January 26, 2024, CC-3 began to purchase MorphoSys securities while in possession of MNPI.

226. On or about February 6, 2024, GE sold MorphoSys call options for a profit of approximately \$3.5 million, one day after Novartis announced that it had agreed to acquire the company.

Overview of the Money Laundering Conspiracy

227. Beginning no later than in or about November 2016 and continuing through at least in or about February 2024, KHOUADJA, SAFI, GE, DONG, LIU, CHOU, DURAI, LEE, CC-1, and CC-2 conspired with each other, and with others known and unknown to the Grand Jury, to engage in financial transactions, knowing that the property involved in the transactions represented the proceeds of securities fraud, and knowing that the transactions were designed to conceal and disguise the nature, location, source, ownership, and control of the proceeds of securities fraud.

Objects and Purposes of the Money Laundering Conspiracy

228. The object of the conspiracy was to commit money laundering. The principal purposes of the conspiracy were to conceal and disguise the nature, location, source, ownership,

and control of the securities fraud proceeds, and to conceal the conspirators' actions from others, including regulators and law enforcement.

Manner and Means of the Money Laundering Conspiracy

229. Among the manner and means by which KHOUADJA, SAFI, GE, DONG, LIU, CHOU, DURAI, LEE, CC-1, CC-2, and others known and unknown to the Grand Jury carried out the conspiracy were the following:

- a. Generating proceeds of securities fraud in brokerage accounts, including U.S. brokerage accounts;
- b. Withdrawing securities fraud proceeds from brokerage and bank accounts in cash;
- c. Meeting with co-conspirators in person to transfer securities fraud proceeds in cash;
- d. Executing wire transfers to transfer securities fraud proceeds to bank accounts that co-conspirators controlled, including wire transfers from U.S. bank accounts;
- e. Using bank and brokerage accounts in other individuals' names to evade detection;
- f. Lying to and misleading banks about the sources of and reasons for cash withdrawals and wire transfers; and
- g. Taking steps to conceal the conspiracy from regulators, law enforcement, banks, and others, including by communicating about the transactions in person, using coded language and encrypted messaging applications, using prepaid cellular phones, and switching SIM cards.

Overt Acts in Furtherance of the Money Laundering Conspiracy

230. Beginning no later than in or about November 2016 and continuing through at least in or about February 2024, KHOUADJA, SAFI, GE, DONG, LIU, CHOU, DURAI, LEE, CC-1, CC-2, and others known and unknown to the Grand Jury, committed and caused to be committed

the following overt acts, among others, including all of the overt acts alleged in paragraphs 48 through 226 above, in furtherance of the money laundering conspiracy.

231. On or about August 9, 2018, CC-1 caused 65,000 Euros to be transferred from an IG Markets brokerage account to a Československá obchodní banka, a.s. (“CSOB”) bank account in the name of Individual 2.

232. On or about August 13, 2018, CC-1 withdrew 100,000 Euros in cash from the CSOB bank account in the name of Individual 2.

233. On or about August 13, 2018, at SAFI’s direction, CC-1 met with SAFI in Vienna, Austria, and handed him 100,000 Euros in cash.

234. On or about October 16, 2018, LIU caused approximately €60,000 to be wired to DURAI and instructed DURAI to transfer the money to a shell company bank account controlled by GE.

235. On or about March 22, 2019, GE wrote a message to an associate stating that his company, Belleby, was a “holdings company” that existed for the purposes of “just holding the cheddar | \$\$\$”.

236. On or about January 17, 2019, DURAI attempted to send more than \$100,000 to a company bank account controlled by DONG. On or about the same day, DURAI sent DONG the following messages: “Cancelled | Bro the bank in hk reject the payment | It’s a company account? They want an invoice to show that I’m paying for something | Money laundering laws | You have a personal bank account I can transfer to? | Where the beneficiary name is a person”. On or about the same day, DONG sent DURAI a sham letter loan agreement, and after DURAI asked DONG what the letter was for, DONG sent DURAI the following messages: “It’s a form | That I loan u and give me back | Easier than invoice”.

237. On or about January 31, 2019, after CC-8 began selling Atos call options for a profit following the public announcement that Atos intended to spin off a stake in Worldline, GE sent CC-8 the following message about kicking back a portion of the illicit profits, “hey bro so now that you’re out already you can should start transferring [*sic*] the profits on my share to your bank | I gotta collect from you asap gotta pay some peeps [winking face emoji]”.

238. On or about January 31, 2019, CHOU sent DONG a message instructing him to send CHOU a fake invoice for \$164,800 as a cover for CHOU kicking back insider trading proceeds to DONG.

239. On or about February 7, 2019, GE and CC-8 met in person at the Fullerton Hotel, in Singapore, and CC-8 gave GE a portion of his illicit trading profits in cash.

240. On or about March 8, 2019, GE and CC-10 exchanged the following coded messages about transferring a portion of the proceeds of CC-10’s insider trading profits to SAFI, whom CC-10 referred to as their “friend”:

CC-10:	Hey bro. Our friend told me there is something to collect. Problem is I am not in Sg. And only person who can get it is my best buddy. But he is stuck at my place cause he is a bit sick. You think it would be possible to hand it to him at my condo ?
GE:	im not in Singapore
GE:	haha
GE:	and im with our friend in another city
GE:	i don’t think theres anything to collect
GE:	ive arranged
CC-10:	Ok cool
CC-10:	Perfect

CC-10: :)

GE: thanks bro

CC-10: Say hi for me.

CC-10: He asked me a few days ago.. and i just found a way today lol

CC-10: Have fun

GE: haha thnanks!

241. On or about March 18, 2019, GE and CC-10 exchanged the following coded messages in which they discussed having GE take over CC-10's role in laundering the proceeds of the insider trading scheme—which they referred to as “meat”:

CC-10: Basically.. maybe you know. I am taking care of logistic for the meat business of our friends...

CC-10: And these days i need to focus more on the IT department.

CC-10: So I have to make the transition of this part of the business to you eventually.. and wanted to discuss with you the fees i usually take and if you think it would be good for you.

CC-10: I will talk to Eamma [SAFI] then and see how i can make this transition to you

GE: Yeah for sure

GE: I got it

GE: Thanks bro maybe I can even travel to where you are if it's important

CC-10: Yes. Can you talk to eamma.. he will explain you why SG :)

CC-10: Have fun

CC-10: Cheers

GE: got it

242. On or about March 25, 2019, GE and CC-10 exchanged the following coded messages, in which they again referred to SAFI as their “friend” and to the illicit insider trading proceeds as “meat”:

CC-10: Yes. Our friend said you bring some meat right ?

GE: we will meet but i wasn't informed about any meat

CC-10: He said 40kg

CC-10: He asked me to collect today.. thats why i thought you know

GE: no ill ask him now

CC-10: Ok thanks

243. On or about March 27, 2019, GE and CC-10 exchanged the following messages:

GE: Hey bro so I spoke to our friend and I realized there was a miscommunication

GE: Yeah I have the 40 kg meat for you but it might be a bit complicated to get it delivered this week as I might be going to Indo tomorrow

GE: Is it possible for me to pass you when we meet next in 10 days?

CC-10: Let me check buddy

CC-10: Hey bro

CC-10: Impossible to get them tmrw ?

CC-10: Cause they really needed it now

CC-10: I could drop by in the morning

GE: No it's not possible because I don't have them in my personal fridge

244. On or about April 2, 2019, GE and CC-10 exchanged the following coded messages about wiring insider trading proceeds in U.S. dollars to a bank account CC-10 controlled:

CC-10: Hello bro

CC-10: When could you bring the meat to my friend.

CC-10: He could collect the 40 kg everyday after work

CC-10: 7pm onwards at his warehouse

GE: I'll see what I can do

GE: Bro the meet should be us meat or sg meat

CC-10: Ok. Actually can deposit the american meat. Directly on my personal fridge.

CC-10: Gimme your number. I will give you the exact address of the warehouse

GE: I can deposit

CC-10: Cool

CC-10: [thumbs up image]

CC-10: Awesome That's really helpful cause it allows me to ship it fresh. Very fast

GE: Okay great

GE: I'll write you these days to arrange it

GE: I can't promise by tomorrow but by this week it's ok

GE: Hey bro please send me your account details so I can send you the funds for the meat

CC-10: Ok

GE: I'll send you via citybank

CC-10: Yep

GE: So if you're citybank account would be much easier

CC-10: I have dbs multicurrency sorry

GE: It's fine I'll just get it sent

GE: Will do it tomorrow ok

GE: Will go to my bank to get it done

CC-10: DBS
Branch: Suntec City
Bank Addr: 3E Temasek Blvd, 709-711, Singapore 038984
Account holder :[CC-10 name]
(iban): [redacted]
multi-currency account: [redacted]

GE: Got it

GE: And I can send USD there without any currency change right

CC-10: Yes

GE: Okay sounds good tomorrow will get it done

CC-10: Ok try to make it early if possible. Cause I will need to send the meat for an urgent catering ... in europe.

CC-10: Thanks a lot !

245. On or about April 4, 2019, GE caused a \$40,000 wire to be sent from a bank account he controlled to a Development Bank of Singapore bank account in the name of CC-10.

246. On or about October 25, 2019, CHOU sent DONG a hand-written ledger of insider trading proceeds and monetary payments, which listed “Samy” next to amounts associated with KHOUADJA.

247. On or about April 1, 2020, at the direction of GE and SAFI, CC-1 caused a \$300,000 wire to be sent from a Bank of America account he controlled to an account in the name of Individual 7. At GE’s instruction, CC-1 falsely advised the bank that the purpose of the transfer was to acquire personal goods.

248. On or about April 9, 2020, GE caused a DHL box to be shipped to CC-1’s address in the United States, with a label falsely indicating it was from Individual 7.

249. On or about September 1, 2020, approximately two days after the announcement that Veolia had offered to acquire a stake of Suez, GE and LEE exchanged the following Telegram messages, in which they discussed kicking back a 50 percent share of LEE’s illicit proceeds from trading on the deal in a suitcase full of cash:

LEE:	Btw total for sev is about hkd 9m
LEE:	Not bad right
LEE:	Yours is 4.5m
GE:	Yeh
GE:	Not bad bro
GE:	Suitcase ready hahaha
LEE:	Approx 577k usd
LEE:	Or 580k
GE:	Nice bro
LEE:	Last time still owe you 345k

COUNT ONE
Conspiracy to Commit Securities Fraud
(18 U.S.C. § 1349)

The Grand Jury charges:

250. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 249 of this Indictment.

251. From in or about at least November 2016 through in or about at least February 2024, in the District of Massachusetts and elsewhere, the defendants,

(1) SAMY FADI KHOUADJA,

(2) EAMMA SAFI,
a/k/a “TT,”
a/k/a “Yummy,”
a/k/a “Situatie Packered,”
a/k/a “Roman Kna,”

(3) ZHI GE,
a/k/a “Josh Ge,”
a/k/a “Josh Gez,”
a/k/a “Jay Gat,”

(4) CHRISTOPHE DONG,

(5) JULIEN LIU,

(6) PATRICK CHOU,

(7) CHEUK YUE LEE,
a/k/a “Ryan,”
a/k/a “m100,”

and

(8) DEV ANANTH DURAI,
a/k/a “Devah,”

conspired with one another, and with others known and unknown to the Grand Jury, to commit securities fraud, that is, to knowingly execute and attempt to execute a scheme and artifice (a) to

defraud persons in connection with securities of issuers with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, including Alexion Pharmaceuticals Inc., Cytokinetics, Inc., Kindred Healthcare, Inc., Medidata Solutions, Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc.; and (b) to obtain, by means of false and fraudulent pretenses, representations and promises, money and property in connection with the purchase and sale of securities of issuers with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, including Alexion Pharmaceuticals Inc., Cytokinetics, Inc., Kindred Healthcare, Inc., Medidata Solutions, Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc., in that KHOUADJA, SAFI, GE, DONG, LIU, CHOU, DURAI, and LEE traded in the securities of those companies while in possession of material non-public information and provided material non-public information to other co-conspirators so that they could trade in the securities of those companies, in violation of Title 18, United States Code, Section 1348.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
Conspiracy to Commit Securities Fraud
(18 U.S.C. § 371)

The Grand Jury charges:

252. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 249 of this Indictment.

253. From in or about at least November 2016 through in or about at least February 2024, in the District of Massachusetts and elsewhere, the defendants,

(1) SAMY FADI KHOUADJA,

(2) EAMMA SAFI,
a/k/a "TT,"
a/k/a "Yummy,"
a/k/a "Situatie Packered,"
a/k/a "Roman Kna,"

(3) ZHI GE,
a/k/a "Josh Ge,"
a/k/a "Josh Gez,"
a/k/a "Jay Gat,"

(4) CHRISTOPHE DONG,

(5) JULIEN LIU,

(6) PATRICK CHOU,

(7) CHEUK YUE LEE,
a/k/a "Ryan,"
a/k/a "m100,"

and

(8) DEV ANANTH DURAI,
a/k/a "Devah,"

conspired with one another, and with others known and unknown to the Grand Jury, to commit an offense against the United States, to wit, securities fraud, in violation of Title 15, United States

Code, Sections 78j(b) and 78ff, and Title 17, Code of Federal Regulations, Section 240.10b-5, that is, knowingly and willfully, by the use of means and instrumentalities of interstate commerce, the mails, and the facilities of a national securities exchange, directly and indirectly to use and employ manipulative and deceptive devices and contrivances in connection with the purchase or sale of securities in contravention of Rule 10b-5 of the Rules and Regulations promulgated by the United States Securities and Exchange Commission, and to (a) employ a device, scheme, and artifice to defraud; (b) make untrue statements of material facts and omit to state material facts necessary in order to make the statements made, in light of circumstances under which they were made, not misleading; and (c) engage in acts, practice, and courses of business which would and did operate as a fraud and deceit in connection with the purchase and sale of securities, including The Advisory Board Company, Alexion Pharmaceuticals Inc., Atos S.E., Cytokinetics, Inc., Gemalto N.V., Ingenico Group S.A., Kindred Healthcare, Inc., Medidata Solutions, MorphoSys A.G., Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc.

All in violation of Title 18, United States Code, Section 371.

COUNT THREE
Securities Fraud; Aiding and Abetting
(18 U.S.C. §§ 1348 and 2)

The Grand Jury charges:

254. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 249 of this Indictment.

255. On various dates between on or about November 18, 2016 and on or about February 6, 2024, in the District of Massachusetts and elsewhere, the defendants,

(1) SAMY FADI KHOUADJA,

(2) EAMMA SAFI,
a/k/a "TT,"
a/k/a "Yummy,"
a/k/a "Situatie Packered,"
a/k/a "Roman Kna,"

(3) ZHI GE,
a/k/a "Josh Ge,"
a/k/a "Josh Gez,"
a/k/a "Jay Gat,"

(4) CHRISTOPHE DONG,

(5) JULIEN LIU,

(6) PATRICK CHOU,

(7) CHEUK YUE LEE,
a/k/a "Ryan,"
a/k/a "m100,"

and

(8) DEV ANANTH DURAI,
a/k/a "Devah,"

knowingly executed, and attempted to execute, a scheme and artifice (a) to defraud persons in connection with securities of issuers with a class of securities that was registered under Section 12

of the Securities Exchange Act of 1934, including Alexion Pharmaceuticals Inc., Cytokinetics, Inc., Kindred Healthcare, Inc., Medidata Solutions, Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc.; and (b) to obtain, by means of false and fraudulent pretenses, representations and promises, money and property in connection with the purchase and sale of securities of issuers with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, including Alexion Pharmaceuticals Inc., Cytokinetics, Inc., Kindred Healthcare, Inc., Medidata Solutions, Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc., in that KHOUADJA, SAFI, GE, DONG, LIU, CHOU, DURAI, and LEE traded in the securities of those companies while in possession of material non-public information and provided material non-public information to other co-conspirators so that they could trade in the securities of those companies.

All in violation of Title 18, United States Code, Sections 1348 and 2.

COUNT FOUR
Securities Fraud; Aiding and Abetting
(15 U.S.C. § 78j(b) and 78ff(a); 17 C.F.R. § 240.10b-5; 18 U.S.C. § 2)

The Grand Jury charges:

256. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 249 of this Indictment.

257. On various dates between on or about November 18, 2016 and on or about February 6, 2024, in the District of Massachusetts and elsewhere, the defendants,

(1) SAMY FADI KHOUADJA,

(2) EAMMA SAFI,
a/k/a "TT,"
a/k/a "Yummy,"
a/k/a "Situatie Packered,"
a/k/a "Roman Kna,"

(3) ZHI GE,
a/k/a "Josh Ge,"
a/k/a "Josh Gez,"
a/k/a "Jay Gat,"

(4) CHRISTOPHE DONG,

(5) JULIEN LIU,

(6) PATRICK CHOU,

(7) CHEUK YUE LEE,
a/k/a "Ryan,"
a/k/a "m100,"

and

(8) DEV ANANTH DURAI,
a/k/a "Devah,"

did knowingly and willfully, by the use of means and instrumentalities of interstate commerce, the mails, and the facilities of a national securities exchange, directly and indirectly use and employ

manipulative and deceptive devices and contrivances in connection with the purchase or sale of securities in contravention of Rule 10b-5 of the Rules and Regulations promulgated by the United States Securities and Exchange Commission, and did (a) employ a device, scheme, and artifice to defraud; (b) make untrue statements of material facts and omit to state material facts necessary in order to make the statements made, in light of circumstances under which they were made, not misleading; and (c) engage in acts, practice, and courses of business which would and did operate as a fraud and deceit in connection with the purchase and sale of securities, including The Advisory Board Company, Alexion Pharmaceuticals Inc., Atos S.E., Cytokinetics, Inc., Gemalto N.V., Ingenico Group S.A., Kindred Healthcare, Inc., Medidata Solutions, MorphoSys A.G., Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc.

All in violation of Title 15, United States Code, Sections 78j(b) and 78ff(a), Title 17, Code of Federal Regulations, Section 240.10b-5, Title 18, United States Code, Section 2.

COUNT FIVE
Money Laundering Conspiracy
(18 U.S.C. § 1956(h))

The Grand Jury charges:

258. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 249 of this Indictment.

259. From in or about at least November 2016 through in or about at least February 2024, in the District of Massachusetts and elsewhere, the defendants,

(1) SAMY FADI KHOUADJA,

(2) EAMMA SAFI,
a/k/a "TT,"
a/k/a "Yummy,"
a/k/a "Situation Packered,"
a/k/a "Roman Kna,"

(3) ZHI GE,
a/k/a "Josh Ge,"
a/k/a "Josh Gez,"
a/k/a "Jay Gat,"

(4) CHRISTOPHE DONG,

(5) JULIEN LIU,

(6) PATRICK CHOU,

(7) CHEUK YUE LEE,
a/k/a "Ryan,"
a/k/a "m100,"

and

(8) DEV ANANTH DURAI,
a/k/a "Devah,"

conspired with one another, and with others known and unknown to the Grand Jury, to conduct and attempt to conduct financial transactions, knowing that the property involved in such

transactions represented the proceeds of some form of unlawful activity, and which in fact involved the proceeds of specified unlawful activity, that is, securities fraud, in violation of Title 18, United States Code, Section 1348, Title 15, United States Code, Sections 78j(b) and 78ff(a), Title 17, Code of Federal Regulations, Section 240.10b-5, as charged in Counts Three and Four, and knowing that that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT SIX
Money Laundering; Aiding and Abetting
(18 U.S.C. §§ 1956(a)(1)(B)(i) and 2)

The Grand Jury charges:

260. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 249 of this Indictment.

261. On or about April 1, 2020, in the District of Massachusetts and elsewhere, the defendants,

(2) EAMMA SAFI,
a/k/a "TT,"
a/k/a "Yummy,"
a/k/a "Situation Packered,"
a/k/a "Roman Kna,"

and

(3) ZHI GE,
a/k/a "Josh Ge,"
a/k/a "Josh Gez,"
a/k/a "Jay Gat,"

conducted and attempted to conduct a financial transaction, to wit a wire transfer of \$300,000 from Bank of America account ending in x4046 to a China Construction Bank account, knowing that the property involved in such transaction represented the proceeds of some form of unlawful activity, and which in fact involved the proceeds of specified unlawful activity, that is, securities fraud, in violation of Title 18, United States Code, Section 1348, Title 15, United States Code, Sections 78j(b) and 78ff(a), Title 17, Code of Federal Regulations, Section 240.10b-5, as charged in Counts One and Two, and knowing that that the transaction was designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

FORFEITURE ALLEGATION

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

262. Upon conviction of one or more of the offenses charged in Counts One, Two, Three, and Four, the defendants,

(1) SAMY FADI KHOUADJA,

(2) EAMMA SAFI,
a/k/a "TT,"
a/k/a "Yummy,"
a/k/a "Situatie Packered,"
a/k/a "Roman Kna,"

(3) ZHI GE,
a/k/a "Josh Ge,"
a/k/a "Josh Gez,"
a/k/a "Jay Gat,"

(4) CHRISTOPHE DONG,

(5) JULIEN LIU,

(6) PATRICK CHOU,

(7) CHEUK YUE LEE,
a/k/a "Ryan,"
a/k/a "m100,"

and

(8) DEV ANANTH DURAI,
a/k/a "Devah,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

263. If any of the property described in paragraph 262, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 262 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

MONEY LAUNDERING FORFEITURE ALLEGATION
(18 U.S.C. § 982(a)(1))

264. Upon conviction of one or more of the offenses charged in Counts Five and Six, the defendants,

(1) SAMY FADI KHOUADJA,

(2) EAMMA SAFI,
a/k/a "TT,"
a/k/a "Yummy,"
a/k/a "Situation Packered,"
a/k/a "Roman Kna,"

(3) ZHI GE,
a/k/a "Josh Ge,"
a/k/a "Josh Gez,"
a/k/a "Jay Gat,"

(4) CHRISTOPHE DONG,

(5) JULIEN LIU,

(6) PATRICK CHOU,

(7) CHEUK YUE LEE,
a/k/a "Ryan,"
a/k/a "m100,"

and

(8) DEV ANANTH DURAI,
a/k/a "Devah,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, and any property traceable to such property.

265. If any of the property described in paragraph 264, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendants --

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 264 above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

A TRUE BILL


FOREPERSON



IAN J. STEARNS
ASSISTANT UNITED STATES ATTORNEY

District of Massachusetts: November 4, 2025
Returned into the District Court by the Grand Jurors and filed.

/s/Thomas F. Quinn Jr. 11/4/2025 @ 4:10pm
DEPUTY CLERK