
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Cathy L. Waldor
	:	
v.	:	
	:	Crim. No. 12-7061
PATRICK SIU, a/k/a "Sam Huang,"	:	
HAI DONG JIANG, a/k/a "Jimmy,"	:	
HAI YAN JIANG, a/k/a "Yan,"	:	CRIMINAL COMPLAINT
FEI RUO HUANG, a/k/a "Emily,"	:	
a/k/a "Ah Yue,"	:	
DA YI HUANG, a/k/a "Boss," a/k/a "Da Nian,"	:	
WU LIN, a/k/a "Lin Wu,"	:	
WAI KWOK HO, a/k/a "Willie,"	:	
SZE YEUNG MA, a/k/a "Timmy,"	:	
WEI QIANG ZHOU, a/k/a "Ivan," a/k/a "Ah	:	
Qiang,"	:	
DAO FENG SHI, a/k/a "Ah Dao,"	:	
NING GUO, a/k/a "Danny," a/k/a "Peter," a/k/a	:	
"The Beijing Kid,"	:	
JIAN ZHI MO, a/k/a "Jimmy,"	:	
CHENG DONG XIA, a/k/a "Dong Ge,"	:	
MIAO TRACY ZHOU, a/k/a "Ah Miao,"	:	
XIANCE ZHOU, a/k/a "Ah Cai," and	:	
JIAN CHUN QU	:	

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From at least as early as in or about November 2009 to in or about February 2012, in Essex and Union Counties, in the District of New Jersey and elsewhere, the defendants listed on Attachment A, did:

SEE ATTACHMENT A

I further state that I am a Special Agent with Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

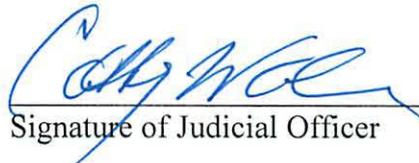


Brad Greenberg, Special Agent
Homeland Security Investigations

Sworn to before me and subscribed in my presence,

March 1, 2012, at Newark, New Jersey

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count 1
(Conspiracy to Traffic in Counterfeit Goods)

From at least as early as in or around September 2009 through in or around February 2012, in Essex and Union Counties, in the District of New Jersey, and elsewhere, defendants

PATRICK SIU, a/k/a "Sam Huang,"
HAI DONG JIANG, a/k/a "Jimmy,"
HAI YAN JIANG, a/k/a "Yan,"
FEI RUO HUANG, a/k/a "Emily," a/k/a "Ah Yue,"
DA YI HUANG, a/k/a "Boss," a/k/a "Da Nian,"
WU LIN, a/k/a "Lin Wu,"
WAI KWOK HO, a/k/a "Willie,"
SZE YEUNG MA, a/k/a "Timmy,"
WEI QIANG ZHOU, a/k/a "Ivan," a/k/a "Ah Qiang,"
NING GUO, a/k/a "Danny," a/k/a "Peter," a/k/a "The Beijing Kid,"
JIAN ZHI MO, a/k/a "Jimmy,"
DAO FENG SHI, a/k/a "Ah Dao,"
CHENG DONG XIA, a/k/a "Dong Ge," and
MIAO TRACY ZHOU, a/k/a "Ah Miao"

did knowingly and intentionally conspire and agree with each other and with others to traffic and attempt to traffic in goods and services and knowingly used counterfeit marks on and in connection with such goods and services, and intentionally trafficked and attempted to traffic in labels, patches, stickers, wrappers, badges, emblems, medallions, charms, boxes, containers, cans, cases, hangtags, documentation, and packaging of any type and nature, knowing that counterfeit marks had been applied thereto, the use of which was likely to cause confusion, to cause mistake, and to deceive.

In violation of Title 18, United States Code, Section 2320 and Section 2.

Counts 2 through 6
(Trafficking in Counterfeit Goods)

On or about the dates set forth below, in Essex and Union Counties, in the District of New Jersey, and elsewhere, defendants

PATRICK SIU, a/k/a "Sam Huang,"
HAI DONG JIANG, a/k/a "Jimmy,"
FEI RUO HUANG, a/k/a "Emily," a/k/a "Ah Yue,"
WAI KWOK HO, a/k/a "Willie,"
NING GUO, a/k/a "Danny," a/k/a "Peter," a/k/a "The Beijing Kid," and
JIAN ZHI MO, a/k/a "Jimmy"

did knowingly and intentionally traffic and attempt to traffic in goods and services and knowingly used counterfeit marks on and in connection with such goods and services, and intentionally trafficked and attempted to traffic in labels, patches, stickers, wrappers, badges, emblems, medallions, charms, boxes, containers, cans, cases, hangtags, documentation, and packaging of any type and nature, knowing that counterfeit marks had been applied thereto, the use of which was likely to cause confusion, to cause mistake, and to deceive, as specified on the following chart:

Count	Defendants	Approximate Date	Description
2	PATRICK SIU, NING GUO, FEI RUO HUANG	November 9, 2010	UGG Footwear; Nike Sneakers
3	PATRICK SIU, HAI DONG JIANG, NING GUO	December 16, 2010	UGG Footwear; Nike Sneakers
4	PATRICK SIU, HAI DONG JIANG, FEI RUO HUANG, WAI KWOK HO	January 9, 2011	UGG Footwear
5	PATRICK SIU, HAI DONG JIANG, FEI RUO HUANG, JIAN ZHI MO	January 16, 2011	Nike Sneakers
6	PATRICK SIU, HAI DONG JIANG, FEI RUO HUANG	March 28, 2011	Nike Sneakers

In violation of Title 18, United States Code, Section 2320 and Section 2.

Count 7
(Conspiracy to Structure Funds)

From at least as early as in or around September 2009 through in or around February 2012, in Essex and Union Counties, in the District of New Jersey, and elsewhere, defendants

HAI DONG JIANG, a/k/a "Jimmy,"
HAI YAN JIANG, a/k/a "Yan,"
FEI RUO HUANG, a/k/a "Emily," a/k/a "Ah Yue,"
XIANCE ZHOU, a/k/a "Ah Cai," and
JIAN CHUN QU

for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations issued thereunder, conspired and agreed with each other and others to cause and attempt to cause a domestic financial institution to fail to file a report required under section 5313(a) and 5325 and any regulation prescribed under any such section, contrary to Title 31, United States Code, Section 5324(a)(1) and 5324(d)(1).

In violation of Title 18, United States Code, Section 371.

First Forfeiture Allegation

The allegations contained in Count 1 through 6 of this Complaint are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 2323.

The United States hereby gives notice to the defendants, that upon their conviction of any of the offenses charged in Counts 1 through 6 of this Complaint, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2323, which requires any person convicted of such offenses to forfeit any property used, or intended to be used, in any manner or part to commit or facilitate the commission of such offenses or any property constituting or derived from any proceeds obtained directly or indirectly as a result of such offenses, including but not limited to the real property located at 184 Westwood Avenue, Staten Island, New York.

If any of the above-described forfeitable property, 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 intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of such defendants up to the value of the forfeitable property described above.

ATTACHMENT B

I, Brad Greenberg, have been a Special Agent with Homeland Security Investigations (“HSI”) for approximately two years, and I have been personally involved in the investigation of this matter. The information contained in this Complaint is based on my personal knowledge and on information obtained from other sources, including: a) statements made or reported by various witnesses with knowledge of relevant facts; b) my review of publicly available information relating to the defendants; and c) my review of business records, bank records and other documents and evidence obtained through Court orders, subpoenas and other sources. Because this Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the content of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in substance and in part, except where otherwise specifically indicated. All times and dates indicated in this affidavit are approximate, and the descriptions of recorded calls and meetings discussed in this affidavit are based on partial, non-verbatim summaries of the conversations based on descriptions of the conversations prepared by monitors.

OVERVIEW OF THE SMUGGLING SCHEME

1. The investigation has uncovered a massive conspiracy that used stolen corporate identities and false personal identification documents to compromise security at Port Newark-Elizabeth Marine Terminal (the “Port”) and help import hundreds of millions of dollars’ worth of counterfeit goods into the United States (the “Smuggling Scheme”). Defendants and their co-conspirators (collectively, the “Co-Conspirators”) included individuals with various different functions. In the broadest terms:
 - a. The Co-Conspirators imported and attempted to import hundreds of containers of counterfeit goods – primarily handbags, footwear, and clothing – into the United States in furtherance of the Smuggling Scheme. These goods, if legitimate, would have had a retail value of more than approximately \$300 million.
 - b. The counterfeit goods were manufactured in China and smuggled into the United States through containers falsely associated with legitimate importers.¹
 - c. False and fraudulent documents played a critical role in the Smuggling Scheme. Certain Co-Conspirators created and managed the flow of false shipping paperwork between China and the United States, and supervised the importation of counterfeit goods. Certain Co-Conspirators also created and used false and fraudulent personal identification documents, such as Social Security cards, to continue the Smuggling Scheme.
 - d. Other Co-Conspirators managed the distribution of counterfeit goods once those goods arrived in the United States. After importation, the counterfeit goods were delivered to warehouses, and distributed throughout New York, New Jersey, and elsewhere. Certain Co-Conspirators paid large amounts of cash to undercover law enforcement officers to assist in the removal of counterfeit goods from the Port.

¹ Each of the containers traveled in interstate or foreign commerce, since each of the containers originated in China. In addition, after the containers arrived at the Port, and traveled to warehouses, the goods inside many of the containers were brought to locations in New York, New Jersey, and elsewhere.

- e. Other Co-Conspirators were wholesalers. They obtained counterfeit goods from the directors of the Smuggling Scheme and supplied counterfeit goods to retailers who then sold them to consumers in the United States.
- f. Still other Co-Conspirators were money structurers, who arranged for cash to be wired to China in amounts small enough to avoid applicable financial reporting requirements, to evade detection of the smuggling scheme and of the proceeds related thereto.

BACKGROUND

2. At all times relevant to this Complaint:

- a. The Port was located in New Jersey and was operated by the Port Authority of New York and New Jersey. It was the largest container port in the eastern United States. The Port handled more than 3,700 vessels and more than 2.5 million containers annually, with a total value of more than \$100 billion in goods passing through the Port per year.
- b. Nearly all international trade involved “intermodal freight transportation.” In this process, freight was transported through several different “modes” of transport – such as truck, rail, and ship – without the cargo ever being loaded and unloaded from its container.
- c. The standard units of intermodal freight transportation were corrugated steel containers, also known as “boxes.”
- d. Over 90 percent of all international non-bulk cargo moved by containers stacked on transport ships. Of these, more than one quarter originated in China.
- e. China was a known source location for counterfeit goods.
- f. Each container was tracked using a unique set of letters and numbers (the “Container Number”).
- g. Each international shipment of goods involved several different parties, including:
 - i. United States Customs and Border Protection (“CBP”): The United States government agency responsible for inspecting imported goods.
 - ii. Shipper or Consignor: The owner of the goods shipped.
 - iii. Consignee: The entity to whom the goods were destined.
 - iv. Freight Forwarder and Customs Broker: Entities that assisted shippers and consignees to navigate the paperwork, fees, and regulations relating to imports and exports.
- h. Besides the Container Numbers, containers were also tracked using several kinds of documents (collectively, the “Customs Paperwork”), including:
 - i. Bill of Lading: Provided the terms of the contract between the shipper and

the transportation company hired by the shipper to send a container to its destination.

- ii. **Entry Summary:** Declared items arriving into the United States in a container. Organized by tariff schedule, the Entry Summary allowed CPB inspectors to easily determine what was included in a shipment and impose importation fees accordingly.
- iii. **Power of Attorney:** Authorized an agent of the shipper to conduct certain activities for the shipper.
- iv. **Commercial Invoice:** Described the buyer and, if different, the consignee.
- i. Ordinarily, the Shipper arranged with a Freight Forwarder to send a shipment of goods. The Freight Forwarder then worked with a Customs Broker to issue an Entry Summary, and, after CBP inspected the Customs Paperwork, the container was released from Customs and permitted to exit the Port.
- j. CBP and other government agencies, however, could place a container on “hold.” A container on hold would not be allowed to leave the Port until the authorities conducted a further examination of the container’s contents. Authorities used holds to x-ray, sample, and inspect goods. These measures determined, among other things, whether containers included counterfeit goods.
- k. Holds could be imposed either while containers were still en route to the United States or after the containers had arrived at the Port.
- l. Shippers and consignees, particularly those involved in the importation of counterfeit goods, were highly cognizant of the process of “holds” because holds cost time and money.

THE INVESTIGATION

- 3. After being alerted to the Co-Conspirators’ ongoing scheme to import counterfeit goods into the Port, law enforcement introduced several undercover Special Agents (collectively, the “UCs”) to the Co-Conspirators. The UCs purported to have unspecified “connections” at the Port, which allowed the UCs to release containers that were on hold, and pass them through to the Co-Conspirators. The Co-Conspirators paid the UCs for these “services.” In total, during the course of this investigation, the Co-Conspirators provided the UCs more than \$2 million.
- 4. The UCs conducted recorded phone calls and in-person meetings with various Co-Conspirators.
- 5. The investigation also used the Court-ordered interception of wire and electronic communications of various Co-Conspirators. Examples of some of these communications are set forth below.

A. The Investigation Begins

- 6. Beginning in or about September 2009, law enforcement learned that certain then-unknown individuals were stealing the identities of legitimate companies and using these

companies' information on Customs Paperwork associated with containers of counterfeit goods.

7. In or around January 2010, law enforcement officers approached Cooperating Witness ("CW-1"), a customs broker who had filed Customs Paperwork on certain containers of counterfeit goods. CW-1 stated that CW-1 had been contacted by an individual using the name "Sam Huang" to import containers of goods from China.
8. The investigation revealed that "Sam Huang" was Defendant Patrick Siu.
9. CW-1 had communicated with Siu via e-mail, and provided investigators with several e-mail addresses belonging to Siu (the "Siu E-Mail Accounts").
10. Law enforcement officers obtained search warrants for the Siu E-Mail Accounts. Documents within these accounts showed that Siu purported to represent various legitimate companies (whose identities had actually been stolen) in connection with shipments of counterfeit goods. Siu then attached falsified Customs Paperwork to these e-mails.
 - a. For example, on or about March 18, 2010, Siu contacted CW-1 via e-mail from one of the Siu E-Mail Accounts, and offered to pay a fee to ensure that his container of counterfeit goods would be cleared from hold and released from the Port. The e-mail stated, in substance and in part, "Thank You for help. I think you know whats going on. . . . If you trust me, just let me [know] what is the fee to be out."²
11. Law enforcement officers then identified, and placed holds on, approximately 40 containers connected to the Smuggling Scheme. Upon examination, these containers were found to be filled with counterfeit goods – goods which, again, had no relation to the Customs Paperwork filed for entry.

B. UC-1 Is Introduced

12. In or around March 2010, CW-1 introduced a UC ("UC-1") to Siu, under the pretense that UC-1 had connections at the Port, and thus could assist Siu in removing holds from the approximately 40 containers of counterfeit goods that belonged to Siu and others.
13. On or about March 18, 2010, Siu wrote to CW-1 from one of the Siu E-Mail Accounts and stated, "I can had someone to wire you the money, anywhere. But I need the container first. I think that's not a problem for you if you have some [kind] of hook up."
14. Beginning in or around April 2010, UC-1 began to deal directly with Siu. UC-1 demanded between approximately \$45,000 and approximately \$60,000 to clear a container of counterfeit goods that was already on hold at the Port, and approximately \$15,000 for each container of counterfeit goods which the Co-Conspirators identified as theirs while the container was still in transit from China to the United States.

² All spelling and punctuation is as per the original.

C. The Fraudulent Scheme

15. Pursuant to this arrangement, the Co-Conspirators began importing containers of counterfeit goods through UC-1 in or around April 2010.
16. Defendant Siu e-mailed bills of lading to UC-1's e-mail account. The bills of lading included the container number and the date of each container's arrival at the Port. Each bill of lading included false and fraudulent information. For example, the consignees listed on the majority of the bills of lading were legitimate companies, but were neither the actual recipients of the goods, nor aware that their corporate identities were being used in this manner.³
17. Moreover, the Co-Conspirators often tailored the descriptions of the containers' contents to correspond with the legitimate company whose information was being stolen. These descriptions did not accurately represent the containers' contents.
 - a. For example, on or about October 12, 2011, Siu e-mailed UC-1, and attached a bill of lading, relating to a certain container of counterfeit goods. This container was listed as containing "plastic hangers," "photograph frames," and "plastic hair pins." In fact, it was filled with counterfeit UGG brand boots.
 - b. As another example, on or about November 17, 2011, Siu e-mailed UC-1, and attached a bill of lading, relating to another container of counterfeit goods. This container was listed as containing "photograph frames," "plastic hangers," and "refrigerator magnets." In fact, it was filled with counterfeit Bleu by Chanel perfume.
18. The Co-Conspirators also discussed listing false company names and products on the fraudulent documents. The Co-Conspirators were usually careful to list, on falsified Customs Paperwork, goods subject to low tariffs, so as to increase their profits.
 - a. For example, on or about March 23, 2011, defendant Hai Dong Jiang, a/k/a "Jimmy," a/k/a "Dong" ("Dong Jiang") spoke with a Co-Conspirator based in China named Chen Li. Chen Li stated, "The invoice you sent me with the three companies on it – one of the company is W-Y-N-N company. What does that company make?" Dong Jiang replied, "You can't find out? . . . Can you be more detailed on the invoice Can you put in what the product is and what is made of?" Dong Jiang then continued, "Let's talk about what the company makes because it affects how much the custom is going to tax. Let me check it out first before you send the invoice. I want to see which kind of product has the lowest tax. We have to be very careful with this because if not we are not going to make money."
 - b. As another example, on or about April 7, 2011, Dong Jiang spoke with a "Mr. Yang." Yang began the call by asking, "You think I should report it as coffee machines, because if you report it as toys it'll be too heavy?" Dong Jiang replied, "Okay, that's fine. Can you check how much is the duty?"

³ Later in the Smuggling Scheme, the Co-Conspirators began listing wholly fraudulent companies on Customs Paperwork.

19. The Co-Conspirators also falsified other kinds of Customs Paperwork to further the Smuggling Scheme.
 - a. For example, on or about May 6, 2011, Dong Jiang told Defendant Da Yi Huang, a/k/a "Boss," a/k/a "Da Nian" ("Da Yi"), "One container is arriving today. So I sent it to her today. The customs broker called to check from the P.O.A. [Power of Attorney] that I filled. They found out that the company did dispatch merchandise. So now I have to find a new customs broker." Da Yi replied, "OK. You are looking for it right now?" Dong Jiang responded, "I think it might be too late to look for one. I felt that no one is going to do it. . . . Just reported [it] as normal stuff. We are not going to tell [the broker] that it's counterfeit because in few days we'll release it. Right?" Da Yi replied, "That's fine." Dong Jiang then asked, "If [the broker] don't want to do it then what should we do?" Da Yi answered, "I think she will do it. Just tell her it's normal stuff, not counterfeits."
20. Fraudulent Customs Paperwork was essential to the scheme. During the course of the scheme, however, certain freight forwarders and customs brokers began to require social security numbers and other information to complete Customs Paperwork on containers. This caused certain Co-Conspirators to begin creating new types of fraudulent documents.
 - a. For example, on or about March 30, 2011, Defendant Dong Jiang called Defendant Fei Ruo Huang, a/k/a "Emily," a/k/a "Ah Yue" ("Ruo Huang"), and stated, "Me and Patrick [Siu], we made about ten Social Security card numbers [today]." Ruo Huang asked, "Where did you get it?" Dong Jiang replied, "We made it up." Ruo Huang then stated, "That's a felony." Dong Jiang replied, "We have no choice. We have their stuff there already. What [are] we going to [do], just give up? We have to do it."
21. Each container that the Co-Conspirators imported was found to contain counterfeit goods.
 - a. Attached as Exhibits A, B, C and D are photographs of the contents of certain containers of counterfeit goods imported by the Co-Conspirators as part of the Smuggling Scheme.
 - b. Attached as Exhibits E, F, and G are photographs of individuals items of counterfeit goods imported by the Co-Conspirators as part of the Smuggling Scheme.
22. Once the containers of counterfeit goods were imported into the United States and removed from the Port, the Co-Conspirators discussed, among themselves, how the goods were to be distributed.
 - a. For example, on or about December 10, 2010, on a call between Defendant Ruo Huang and Defendant Guo, Ruo Huang told Guo to "get a pen" and then proceeded to relay orders of boxes of counterfeit goods for various buyers, specifically for "Anna," "Ah Hai," "Ah Mel," and "Li Ping." For each buyer, Ruo Huang indicated the number of boxes of each type of counterfeit UGG and Timberland brand footwear that should be delivered, referring to the shoes as "Black," "Timberland," "Coffee," or "Sand color." Guo replied that the boxes, 490 in total, would be delivered the next day.
23. Delivery of containers of counterfeit goods ordinarily happened in one of two ways.

- a. In some cases, the Co-Conspirators contacted UC-1 and informed UC-1 of the location to which the counterfeit goods should be delivered.
 - i. For example, on or about April 21, 2010, Defendant Siu e-mailed UC-1 and stated, "Can you deliver to 49 Rutherford Street, Newark, NJ? Will have 60K for you tomorrow."
 - ii. On or about April 22, 2010, UCs delivered a container of counterfeit goods to a warehouse controlled by the Co-Conspirators at or around 49 Rutherford Street, in Newark, New Jersey. UC-1 was later paid approximately \$60,000 by a Co-Conspirator for delivering this container.
 - b. In other cases, the Co-Conspirators arranged to deliver the containers themselves.
 - i. For example, on or about January 5, 2011, Siu contacted UC-1 and stated, in sum and substance, that a particular container of counterfeit goods "will arriv[e] on the 9th. Just [to] let you know . . ."
 - ii. The container did, indeed, arrive on or about January 9, 2011, with a false consignee listed. On or about January 24, 2011, a driver employed by Defendant William Ho, a/k/a "William," a/k/a "Willie" ("Ho") arrived at the Port and picked up the container referenced by Siu, and attempted to drive it away from the Port. Law enforcement officers stopped the container and inspected the contents. The container was found to be filled with counterfeit UGG brand boots. Law enforcement officers seized the container.
24. After the delivery of each container, the Co-Conspirators paid UC-1.
- a. For example, on or about March 28, 2011, UC-1 contacted Defendant Siu and stated that UC-1 wanted to pick up payment for clearing two containers of counterfeit goods.
 - b. Later that day, Defendant Siu called Defendant Dong Jiang and stated, "He will go pick up the money at about 1:00, okay?" Dong Jiang replied, "Okay, no problem."
 - c. Less than an hour later, Defendant Ruo Huang called Defendant Dong Jiang and asked, "We have to give [UC-1] money today?" Dong Jiang replied, "He will pick up the money at 1:00. You should call Lao Mo [Defendant Jian Zhi Mo] to pick it up at your place around 12:30."
 - d. Later that day, UC-1 met with Defendant Mo at a warehouse controlled by the Co-Conspirators, located at 320 Elizabeth Avenue, Newark, New Jersey. Mo provided UC-1 with a package containing approximately \$55,000 in cash as payment for the containers of counterfeit goods that had been released from the Port.
 - e. Attached as Exhibits H and I are photographs of money paid by Co-Conspirators during the pendency of the investigation.

25. Once the Co-Conspirators took possession of the counterfeit goods at warehouses they controlled, they often set up operations to alter the goods and make them suitable for sale. This sometimes included cutting false, generic labels off the goods, to reveal the fraudulent designer labels underneath, or adding fraudulent designer labels or tags to the counterfeit merchandise. The Co-Conspirators referred to these alterations as “processing” the counterfeit goods.
- a. For example, on or about December 15, 2010, Defendant Dong Jiang spoke to Defendant Ning Guo, a/k/a “Danny,” a/k/a “Peter,” a/k/a “The Beijing Kid” (“Guo”). Dong Jiang asked, “How many containers have been processed?” Guo replied that “one has been processed, one is still not done.”
 - b. As another example, on or about November 30, 2010, Defendant Ruo Huang spoke with Defendant Guo. Ruo Huang asked, “Do you have people working there?” Guo replied, “I have my own people doing it. It is slow.” Ruo Huang replied, “Just have more people to do it. It is a rush job. Just take off the lids.” (Ruo Huang is stressing the time-sensitive nature of the work, and instructs Guo to have the workers remove an exterior, generic lid from each box of footwear, which will reveal a secondary lid with the designer brand on it.) Later, Guo stated, “The back logo needs to be taken off.” (Guo is telling Ruo Huang that, in addition to changing the lids, the generic back label on the counterfeit boots, covering the fraudulent UGG label, needs to be removed.) Ruo Huang replied, “It is UGG.” Guo then specified the method of removing the label: “Just use the knife to get the [generic] logo off.”
 - i. Attached as Exhibits J, K, L, and M are photographs of counterfeit goods seized during the pendency of the investigation, showing the types of false lids and generic, covering back labels discussed by Ruo Huang and Guo.
 - c. The Co-Conspirators also received false and fraudulent labels, to be used in the “processing” of counterfeit goods. For example, on or about November 26, 2011, law enforcement officers intercepted a package addressed to Defendant Dao Feng Shi, a/k/a “Ah Dao” (“Dao”). The package was sent from the “Ningguo Sealing Group” in China, and purported to contain “Plastic Label Samples.” The package actually contained over 8,000 counterfeit rubber UGG brand logos and over 20,000 counterfeit UGG brand cloth labels. The word “Australia” was misspelled as “Australla” on the rubber logos.
26. The Co-Conspirators also discussed the payments their customers owed them, and arranged the shipment of the counterfeit goods to various customers.
- a. For example, on or about March 16, 2011, Defendant Ruo Huang spoke with Defendant Dong Jiang. Ruo Huang asked, “You think I should call Xiu Wei for money?” Dong Jiang replied, “Okay.” Ruo Huang continued, “This time she took [goods] for a long time and she still hasn’t called to give [the money for the goods] to us.” Dong Jiang replied, “Okay. Ah Hai owes us money?” Ruo Huang replied, “He still owes us [for] the 300 boxes for the white ones. We should ask [to] get the \$10,000 first. The total is only \$20,000.”
27. The Co-Conspirators set forth their relationships and the different roles played by various Co-Conspirators. They did not let the tribulations of one member alter the fundamental object of the Smuggling Scheme, which was to import as many counterfeit goods as

possible.

- a. For example, on or about March 15, 2011, Defendant Ruo Huang spoke with Defendant Dong Jiang. Ruo Huang stated that “Lao Mo [Defendant Mo] called me and told me that Guo Ning [Defendant Guo] is detained by Customs. I was so scared when I heard that. . . . He was detained because he came with [a] Canadian visa and overstayed his visa last year.” Dong Jiang replied, “Is it for our stuff or not?” Ruo Huang stated, “It’s not for our stuff.” Dong Jiang then turned to the business at hand, asking, “There won’t be a problem loading the merchandise tomorrow, right?” Ruo Huang replied, “No problem. Everything is still the same. I’m so glad it’s not our problem.” Dong Jiang concluded that without Guo to handle certain aspects of the scheme, “F***, now we have to take over the warehouse and storage ourselves.”
28. The Co-Conspirators discussed the nature of their business, and their expansion into importing other types of counterfeit goods regardless of the effect on the health and safety of consumers in the United States.
- a. For example, on or about December 7, 2010, Defendant Hai Yan Jiang, a/k/a “Yan,” (“Yan”) received a call from Defendant Wu Lin, a/k/a “Lin Wu” (“Lin Wu”). At this point in the Smuggling Scheme, the Co-Conspirators, including Yan and Lin Wu, were considering importing counterfeit cosmetics. At one point during the conversation, Lin Wu asked Yan whether these products would be harmful to the users’ skin or body. Yan replied that the cosmetics were “counterfeit, but of good quality.” Then, Yan stated: “All I care about is to make money, other things do not matter.” Lin Wu responded that “business needs to be done with a clear conscience.” Yan replied: “Then go be a monk.”
29. The Co-Conspirators also discussed the profits generated from their illicit activities, and how they used the proceeds of the Smuggling Scheme.
- a. For example, on or about December 17, 2010, Defendant Yan stated to Defendant Lin Wu that she had gotten rid of her Porsche, and had recently purchased a new car, a Mercedes Benz ML 350. Yan stated that “this one is not too expensive, only \$61,000 after tax.” Yan stated that she “picked it up yesterday, with a down payment of \$20,000.”
 - b. On or about December 21, 2010, Defendant Lin Wu spoke with Defendant Yan about the business of Co-Conspirator Dong Jiang – Yan’s brother. Lin Wu asked, “What’s up with Hai Dong?” Yan replied, “Hai Dong is busy, the merchandise has arrived, the UGG has also arrived.” Lin Wu replied, “People have made lots of money from [counterfeit] UGG this period of time. . . . How many containers does he have this year?” Yan replied, “Not many. . . . About over 10 containers.” Lin Wu replied, “Then he has made [a] fortune this year.” Yan concurred: “Yes, he is okay this year.”
 - c. As another example, on or about January 1, 2011, Defendant Yan spoke with another individual, who stated that rumor had it Yan had “made a lot of money” and had “bought a ring for over \$10,000.” Yan replied, referring to Defendant Miao Tracy Zhou, that “Ah Miao’s diamond ring is \$27,000 and it is very pretty.”
30. The Co-Conspirators also discussed methods for avoiding detection of the Smuggling

Scheme by the authorities.

- a. For example, on or about January 24, 2011, CBP officials performed a “gate out” operation on a truck, owned by Defendant Ho, containing counterfeit goods belonging to the Co-Conspirators.⁴ Later that day, Defendants Ruo Huang and Dong Jiang discussed this operation, and its impact on the Co-Conspirators’ commission of the Smuggling Scheme. Dong Jiang stated, “The minute he came in and punch in the slip, the Customs followed. They also went in [and] called somebody.” Ruo Huang asked, “Is he in trouble?” Dong Jiang replied, “I don’t think there were any problems with Ho. I think he left. . . . There are a lot of Da Sheng’s stuff.” Ruo Huang asked, “[Was] the driver scared?” Dong Jiang replied, “They are used to it because it happens often.” Later in the conversation, Dong Jiang stated: “Bad luck, bad luck.” Ruo Huang wanted to limit the damage, and sought to avoid detection by the authorities: “To be on the safe side change your phone if you have to.”
- b. As another example, on or about June 26, 2011, after a Co-Conspirator with the initials “Y.H.L.” was arrested with approximately \$150,000 on his person, Defendant Dong Jiang instructed Defendant Siu to “destroy the phone” that Siu had been using, as Dong Jiang was “100 percent sure that” the Co-Conspirators had been under surveillance. Dong Jiang further stated that he and Siu “can’t be at the same place at the same time,” to avoid detection by law enforcement, and told Siu to “throw out any information about containers.”
- c. Later that same day, Dong Jiang spoke with Defendant Wei Qiang Zhou, a/k/a “Ivan,” a/k/a “Ah Qiang” (“Qiang Zhou”) about Co-Conspirator Y.H.L.’s arrest. Qiang Zhou told Dong Jiang: “Don’t believe that the federal government will not do all the arrests at once”; that “nothing is that simple”; and that he thought his car was being followed. Qiang Zhou also stated that he believed “either there [is a] tracking device on the car or their phone is tapped.” Dong Jiang replied that he “didn’t use this phone so it’s good.”

ROLES OF THE DEFENDANTS

31. There were four primary roles in the Smuggling Scheme:
 - a. **Leaders and Organizers:** This group included Patrick Siu, a/k/a “Sam Huang,” Hai Dong Jiang, a/k/a “Jimmy,” Hai Yan Jiang, Da Yi Huang, a/k/a “Boss,” a/k/a “Da Nian,” and Fei Ruo Huang, a/k/a “Ah Yue,” a/k/a “Emily.” These Co-Conspirators arranged and managed the importation of counterfeit goods from China, stole corporate identities, created false and fraudulent Customs Paperwork and identification documents, collected money from customers, and interacted with UC-1 and others in furtherance of the Smuggling Scheme.
 - b. **Transportation and Storage:** This group included Wai Kwok Ho, a/k/a “William,” a/k/a “Willie,” Wei Qiang Zhou, a/k/a “Ivan,” a/k/a “Ah Qiang,” Sze Yeung Ma, a/k/a “Timmy,” Ning Guo, a/k/a “Danny,” a/k/a “Peter,” a/k/a “The Beijing Kid,” and Jian Zhi Mo, a/k/a “Jimmy.” These Co-Conspirators transported counterfeit

⁴ During a “gate out” operation, a container is loaded onto a truck and, before the container can leave the Port, CBP officials examine the contents of the container.

goods from the Port to warehouses controlled by the Co-Conspirators. Once at the warehouses, these Co-Conspirators also managed the alteration of counterfeit goods so that the goods appeared to be legitimate, brand-name items. These Co-Conspirators also managed the distribution of these goods to large-scale wholesalers of counterfeit goods. Finally, several of these Co-Conspirators paid UC-1 for UC-1's "services."

- c. Wholesalers: This group included Wu Lin, a/k/a "Lin Wu," Dao Feng Shi, a/k/a "Ah Dao," Cheng Dong Xia, a/k/a "Dong Ge," and Miao Tracy Zhou, a/k/a "Ah Miao." These Co-Conspirators obtained counterfeit goods from other Co-Conspirators, and resold these goods to yet other vendors, further down the chain of commerce.
- d. Money Structurers: These Co-Conspirators included Xiance Zhou, a/k/a "Ah Cai" and Jian Chun Qu. The Co-Conspirators generally received cash in exchange for the counterfeit goods that they sold. Certain Co-Conspirators provided this cash to Xiance Zhou and Qu, who then transferred it to China in violation of currency reporting requirements.

THE ROLES OF THE INDIVIDUAL DEFENDANTS

Patrick Siu, a/k/a "Sam Huang" ("Siu")

32. Defendant Patrick Siu, a/k/a "Sam Huang" ("Siu") facilitated the importation and distribution of counterfeit goods, by serving as the "hub" for communications between customs brokers, UC-1, and the Co-Conspirators.
33. Among other things, Siu sent false and fraudulent shipping documents to UC-1 and customs brokers (including by interstate and international faxes and e-mails); engaged in conversations with UC-1, customs brokers, and other Co-Conspirators in furtherance of the Smuggling Scheme; and created or caused to be created false and fraudulent identification documents.
34. During the course of the investigation, Siu was recorded dozens of times by UC-1. During these recorded conversations, Siu set forth his own role and the roles of others in the Smuggling Scheme. As just a couple of examples:
 - a. On or about April 26, 2010, Siu and UC-1 discussed the status of a container of counterfeit goods, and the fact that Siu imported up to four containers of counterfeit goods a month into the United States. UC-1 stated, "I e-mailed you, I ain't going to be able to get you that box tomorrow but . . . I am working on getting you some end of week. The one box you gave me is on hold but I will still charge you \$15,000 [instead of the usual \$50,000 under their agreement]." Siu replied, "When can you get it for me?" After replying that UC-1 was working on it, UC-1 then asked, "How many [containers of counterfeit goods] do you bring in[to the United States] a month?" Siu replied, "After this one I will only have in once or two a month. . . . Future if you feel good to do like three or four at one time, let me know. I do three or four in one month ok?" UC-1 then clarified, "It's all the same stuff? It's the knock-off bags and all that s***?" Siu replied, "Yes."
 - b. Other recorded conversations with UC-1 outlined the structure of the organization. For example, on or about May 6, 2010, UC-1 asked Siu about a Co-

Conspirator. Siu stated, “We have different people. Every people do different jobs. His job is the driver. OK? He is the one picking up the money . . . The guy knows he is getting the money, but I don’t want him knowing how much he is going to bring. . . . He knows that he is bringing money. He knows that it is money. Of course he knows there is money and no drugs – it’s purses. It’s not smuggling people.” Later in the conversation, UC-1 asked Siu what would happen if one of Siu’s drivers was stopped by law enforcement: “That’s the thing – I don’t know your driver. If he gets pulled over with the stuff, is he going to say this is the guy that gets them off the pier?” Siu replied, “No, no, he won’t say that [the goods are] from the pier.” UC-1 then asked, “But he knows, I just want to be sure he is on board and he knows what it is?” Siu replied, “He knows that it is purses and those are shoes; he knows that we don’t put drugs in container . . . that this is for shoes.”

- c. On or about June 3, 2010, UC-1 asked Siu whether all of Siu’s business consisted of illegal counterfeit goods: “Hey let me ask you a question – Do you do any legitimate shipments at all? Or is it all the same stuff?” Siu replied, “Same stuff.”
35. In addition to Siu’s conversations with UC-1, pursuant to Court orders, many of Siu’s conversations with other Co-Conspirators were intercepted by law enforcement.
36. On or about January 20, 2011, Siu and Dong Jiang engaged in a telephone conversation during which they discussed engaging in counterfeit goods transactions with UC-1. Siu provided Dong Jiang with container numbers for counterfeit goods, stating, “One is 8350. . . . One is 5207,” and asked if the containers had cleared U.S. Customs: “Released yet?” Dong Jiang replied, “Yes, released, released.” Later in the conversation, Dong Jiang inquired about three other containers that were still on hold at the Port, and if they should pay UC-1 to get them released: “Tomorrow, those 3 containers of yours. . . . Is it possible to spend more money for taking it out?” Siu replied, “Impossible. He said, it’s not the matter of money. I ask him if I can add more money, he said it’s not the money issue. The first two possibly have been confiscated.” Dong Jiang replied, “Confiscated?” Siu confirmed, “Correct. If the two are being confiscated then the third one will be the same. It’s because the same company handled them.”
37. Although the Co-Conspirators used UC-1 to remove many containers from the Port, they also had other routes for their illegal activities. For example, on or about May 20, 2011, Dong Jiang received a call from Siu. Siu asked, “What about the perfume? Is it still in the port?” Dong Jiang replied, “I already given the [container] number to someone and hope that we’ll get a answer in a week. Then I’ll let them steal it.” Siu asked, “How much dose it cost to smuggle it out?” Dong Jiang replied, “About \$5[0,000].” Siu stated, “That’s not bad. We can do this: [UC-1] can get two containers per month for us so we’ll just use him. And then we’ll do a few on our own.” Dong Jiang then stated, “I found another route. He don’t need to declare or report to the customs or anything like that. He get[s goods and] drag[s them] out from any port. At this point he said it’s 100 percent sure.” Siu asked how much the Co-Conspirators would have to pay this person. Dong Jiang replied: “He is expensive, about the same as [UC-1].”
38. Intercepted calls between Siu and Dong Jiang demonstrated the Co-Conspirators’ efforts to evade detection by law enforcement. On or about June 23, 2011, Co-Conspirator Y.H.L. was apprehended by law enforcement officers with approximately \$150,000 in his possession. Y.H.L. was charged with money laundering-related offenses, and was

detained. This arrest spurred a number of calls between the Co-Conspirators.

39. For example, on or about June 25, 2011, Dong Jiang told Siu that the Co-Conspirators should use new identities going forward: "For the next round, it's going to be opened a new account." (Dong Jiang is stating that the Co-Conspirators will change their identities in dealing with UC-1.) Siu replied, "How do you open a new account with him?" (Siu is wondering how the Co-Conspirators could fool UC-1 in this way.) Dong Jiang replied, "Change a new number, start new with him." Siu, referring to money that the Co-Conspirators still owed UC-1 money, replied, "What if he say something about what happen to the money?" Dong Jiang then stated, "You are not call Sammy any more, you will have another name."
40. As another example, also on or about June 25, 2011, Siu and Dong Jiang again discussed Y.H.L.'s situation. Dong Jiang stated, "He was charged with money laundering since \$150,000, \$180,000 cash was found in the car." Siu replied, "Are you worried about [UC-1] at all?" Dong Jiang replied, "This matter is very obvious. Only [UC-1] knows about that white car which delivers the money." Later in the conversation, Siu stated that if another Co-Conspirator was arrested, then all of the Co-Conspirators' illegal activities might be traced to the Co-Conspirators, whereas if the Co-Conspirators simply shut down their activities now, they could avoid some of the responsibility: "If another one comes, it is not going to be only 18, there are other companies together. 18 plus everything we have done within the year. This is easy to calculate. If we stop now, it means the game is over. All those containers we have handled in the past year will have nothing to do with us." Siu added, "Just think about how many containers." Later, Dong Jiang concluded, "Wait for my instruction. You throw your cell phone when I ask you to do so." Siu replied, "Okay."

Hai Dong Jiang, a/k/a "Jimmy," a/k/a "Dong" ("Dong Jiang")

41. Defendant Hai Dong Jiang, a/k/a "Jimmy," a/k/a "Dong" ("Dong Jiang") served as one of the directors of the Smuggling Scheme. More specifically, Dong Jiang ordered counterfeit merchandise from China; negotiated shipments of counterfeit goods from China; arranged for payment for that merchandise; and supervised the distribution of that merchandise in and around the New York/New Jersey area.
42. For example, on or about December 16, 2010, law enforcement officers observed Dong Jiang take a package from an apartment in New York City and hand it to Defendant Guo. Defendant Guo then gave an identical-looking package to UC-1 as payment for ten containers that UC-1 had "assisted" in passing through the Port and delivering to the Co-Conspirators. The package contained approximately \$150,000.
43. Several hours later, Dong Jiang called Defendant Yan and asked, "Where is the money?" (Dong Jiang wants to know which customers have the payment for shipments of counterfeit goods.) Yan replied that certain customers had money for the Co-Conspirators, but that others would not have money until the next week. Dong Jiang replied, "No, that is no good – I want it right away, I want it for mainland in China." (Dong Jiang is stating that he wants the money immediately so that he can pay the Chinese manufacturers of counterfeit goods.) Later in the conversation, Yan replied, "If we can wait until next week to get the money, then let me tell him . . ." Dong Jiang interrupted, "No, do not wait until next week; we want it right away."
44. Further, Dong Jiang scheduled payments to UC-1 and coordinated the importation of

containers of counterfeit goods. For example, on or about January 31, 2011, Dong Jiang received a call from Siu. Siu stated, “[UC-1] asked me today when the container will come in.” Dong Jiang told Siu to delay UC-1, stating: “Tell him Chinese people are celebrating the new year.” Siu replied, “We should have things coming in next week, correct?” Dong Jiang replied, “Correct.” Siu then asked, “Should I tell him to collect money next week?”

45. Dong Jiang also supervised the sale of counterfeit goods. For example, on or about February 18, 2011, Dong Jiang received a call from Siu. Dong Jiang began the call by complaining, “The container can not sell.” Siu replied, “Last year UGGs were difficult to sell.” Dong Jiang replied, “We will sell them next year.” Later in the conversation, Dong Jiang stated, “More containers will come.”
46. On or about April 14, 2011, Dong Jiang spoke with Defendant Yan, and discussed the process of ordering the manufacture of counterfeit goods, and the best times to make such orders. Dong Jiang stated, “I think it’s too late. It’s already April . . . Right now, you give the sample [of the legitimate product] to the factory, [and] the manufacturer will have to use the sample to make it, right?” Yan replied, “Yeah.” Dong Jiang then stated, “It will take at least a week for them to get it, even if you send the sample in express mail, right? They make it out from the sample after they receive it. That will take few weeks. So now it’s three weeks, right? . . . Let’s just say that it’s good.” Yan replied, “It will take a month to make.” Dong Jiang confirmed, “It will take a month to make one container. . . . It will be in June by the time they finish making it. If shipped out around June, it will take about forty days to be shipped over here by boat. You know that it takes forty days to be shipped it over on our route. . . . [B]y the time it gets here the season [will be] already over. . . . It won’t make it. It definitely won’t make it.” Dong Jiang and Yan also planned for the year ahead: “Next year . . . see what kind of style is good for next year. [A]fter Chinese New Year put in the sample. After the sample is done and everything is taken care and ship it, by this time next year you would already got your merchandise. Then everything will be fine. The best is to ask Ah Miao [Defendant Miao Tracy Zhou] to go to China to find a manufacturer. If we go look for it I’m afraid other people will talk, you know.”
47. Dong Jiang was also involved in the use of fraudulent identification documents in furtherance of the Smuggling Scheme. For example, on or about April 22, 2011, Dong Jiang told Defendant Da Yi that he was looking for some “heads” and “company names.” (Dong Jiang wants fraudulent identities and fraudulent companies to use on Customs Paperwork.) Dong Jiang continued that he got some names “from the accountant.” Dong Jiang told Da Yi that, instead of stealing the identities of real companies, the Co-Conspirators should create their own companies and use fraudulent personal identities in connection with the importation, and stated that “it’s not a good idea to use other peoples’ compan[ies],” but rather “[i]t’s better to use our own, you know, one accident it will cost us [a] few tens of thousand dollars, and with that money we can buy a lot of ‘heads’ to open up, God knows how many companies.”
48. As another example, on or about May 6, 2011, Dong Jiang called Siu, and stated, “You know we have some copies of the driver licenses from before. Pick one clear copy of a Chinese and if you can find one with the last name Huang that will be great. You have to send it to [another individual]. He must have a photo driver license for the P.O.A.” (Dong Jiang is telling Siu how to perpetuate identity theft; specifically, how to pick out a certain identity to associate it with the Power of Attorney for a particular container of counterfeit goods to advance the Smuggling Scheme.) Siu replied, “Okay hold on. I

don't see any last name Huang. There is one, the last name is Lee and in New York." (Siu is apparently going through the list of fraudulent identities that the Co-Conspirators possess to find an appropriate one.) Dong Jiang replied, "Okay. That's fine."

Hai Yan Jiang, a/k/a "Yan" ("Yan")

49. Defendant Hai Yan Jiang, a/k/a "Yan" ("Yan") served as one of the directors of the Smuggling Scheme. Yan resided, at various times, in or around Dallas, Texas and New York, New York. Yan made decisions regarding what kind of counterfeit goods should be manufactured; arranged for payment for counterfeit merchandise; supervised the distribution of that merchandise in and around the New York/New Jersey area; and interacted with wholesalers of counterfeit goods by arranging payments by the wholesalers to the directors of the Smuggling Scheme.
50. Yan had frequent discussions with Defendant Dong Jiang about the delivery of imported counterfeit goods to various customers. For example, on or about December 15, 2010, Dong Jiang stated, "There is so much merchandise being unloaded today. If we don't unload it, it will be very dangerous." Yan replied, "Are you thinking to give this merchandise to that person?" Dong Jiang replied, "After I pull it out, I will unload it tomorrow morning, and I will bring the brochures [catalogues that display various examples of counterfeit goods] to him right away. How is that?"
51. Yan also described how the Co-Conspirators wired money to China in exchange for shipments of counterfeit goods. For example, on or around January 15, 2011, Yan called Defendant Lin Wu, and stated, "I called to tell the person the list of merchandise we want for the next batch. I asked the person to get this batch of merchandise ready. . . . He asked me to wire money over right away because the merchandise will be out on the 18th and today is already the 15th. Tomorrow I'll let [Dong Jiang] get money from you and wire it to China first. You know it is very difficult to wire money through this family. You have to give your money first and wait for your turn to get your money wired out." Lin Wu then asked Yan to tell Lin Wu when Dong Jiang will be back, and Lin Wu will "give you \$30,000 . . . , okay?" Yan replied, "Okay. Anyway you give a whole amount."
52. Yan also engaged in conversations with Chinese-based manufacturers and distributors of counterfeit goods. For example, on or about January 17, 2011, Yan received a call from an individual identified only as "Mr. Liu." Liu began by referencing money owed by the Co-Conspirators. Yan replied, "I have given the money to that person. It will be wired out this week. \$30,000. When I have money I will wire another \$30,000. It is difficult to wire money here and now. I need to wait for my turn to get the money wired out." Later in the conversation, after discussing the risk of being detected, Yan stated, "Safety [not being apprehended] is the most important. I hope and plan to have one container coming in every month this year. Get my merchandise ready, ship out after Chinese new year. I want it for Mother's Day. It should arrive here in March or April."
53. In furtherance of the Smuggling Scheme, Yan and Dong Jiang managed the flow of counterfeit goods. For example, on or about December 18, 2010, Yan told Dong Jiang that she planned to "clear the invoices one by one." Dong Jiang then told Yan to "place the order on February 14." Yan agreed that it was nearly time to place the order, but that she was still "waiting to sell the current merchandise first."
54. On or about December 21, 2010, Yan spoke with Lin Wu about the manufacture,

ordering, and shipping of counterfeit goods. Yan stated, “[T]he merchandise has arrived, the UGG has also arrived.” Lin Wu replied, “People have made lots of money from UGG this period of time.” Later, Lin Wu asked, “[H]ow many containers does [Dong Jiang] have this year?” Lin Wu stated, “We did not think of UGG this year and we have started it too late.” (Lin Wu is stating that he did not think to have counterfeit UGGs made this year.) Lin Wu then stated, “Next year, let’s work on gloves and print ‘North Face’ on them. . . . It is very easy to print on.” Yan replied, “Let me see if my machine can print it.” Lin Wu then stated, “With the print on it, it is sold for \$36.00 a dozen at wholesale. If you order this week, you won’t get it until next week.” Yan replied, “So it is too late to work on it this year.” Lin Wu stated, “Yes. North Face gloves and clothes. I know there is a person from Wenzhou who is selling North Face gloves. It easy to earn money from gloves. Let’s get 10,000 dozens of gloves to hold. Put the prints on. We do the wholesale.” Yan replied, “Just iron the prints on? My goodness. I have the machine, several machines.” Lin Wu stated, “Let’s print it [in the United States]. We can save delivery fees.”

55. Yan also discussed the difficulties of her illicit business. For example, on or about January 18, 2011, Hai Yan engaged in a recorded conversation with Defendant Miao Tracy Zhou, a/k/a “Ah Miao” (“Miao”). Yan stated, “It is difficult to work on the counterfeit merchandise. Working on the counterfeit merchandise is not a business. It’s like sitting on a floating boat, you don’t know when it will be overturned. It is just not stable. The money you make from working on the counterfeit stuff is not real money. It is like a gamble.”

Fei Ruo Huang, a/k/a “Emily” a/k/a “Ah Yue” (“Ruo Huang”)

56. Fei Ruo Huang, a/k/a “Emily,” a/k/a “Ah Yue” (“Ruo Huang”) was another director of the Smuggling Scheme. Ruo Huang resided in or around Staten Island, New York, and coordinated the distribution of counterfeit merchandise once it arrived in the New York/New Jersey area. Ruo Huang directed merchandise to warehouses, where it was stored and then delivered to wholesalers.
57. Ruo Huang was also responsible for coordinating and collecting payments from customers to UC-1. As just one example, on or about November 9, 2010, Ruo Huang arrived at 184 Westwood Avenue, Staten Island, New York – Defendant Da Yi Huang’s home (“184 Westwood”). When Ruo Huang entered 184 Westwood, she was carrying a blue Gap plastic bag in her hand. Later, Defendant Guo was observed leaving 184 Westwood and getting into his vehicle. Defendant Guo then met with UC-1 and provided UC-1 with a blue plastic Gap bag. The blue bag contained approximately \$45,000 as partial payment for UC-1’s “services” of clearing several containers of counterfeit goods, which had been imported earlier, and about which Defendant Siu had communicated with UC-1.
58. Ruo Huang discussed the status of various shipments of counterfeit goods with Dong Jiang and others. For example, on or about January 24, 2011, CBP officials performed a “gate out” operation on a truck owned by Defendant William Ho, a/k/a “William,” a/k/a “Willie” (“Ho”), as discussed above. Later that day, Ruo Huang and Dong Jiang discussed this operation, and its impact on the Co-Conspirators’ commission of the Smuggling Scheme. Dong Jiang began by stating, “Nothing is going well for me today. I’m so stressed. I don’t have a good feeling today. I felt something is not right.” Ruo Huang replied, “Everyone is waiting.” Ruo Huang then turned to other containers, imported using the same false company information: “I think there are problems. The

three companies are the same.” (Ruo Huang is worried because two other containers also were imported using the same company’s falsified information.) Ruo Huang then stated: “To be on the safe side change your phone if you have to.”

59. Ruo Huang was also involved in the collection of money from customers and the wiring of that money, through Co-Conspirators Xiance Zhou, a/k/a “Ah Cai” (“Xiance Zhou”) and Jian Chun Qu (“Qu”), to China, in furtherance of the Smuggling Scheme. For example, on or about March 9, 2011, Ruo Huang and Dong Jiang discussed how a Chinese-based conspirator had paid manufacturers large amounts of money, and how much of that money was attributable to various Co-Conspirators. Ruo Huang stated, “Older brother just now called from China saying he had paid lots of money.” (Ruo Huang is saying that an unidentified co-conspirator has paid several Chinese manufacturers a large amount of money for counterfeit goods.) Ruo Huang later stated, “I will put them in a bag later on. Money order is \$21,369. Minus \$747 for the percentage, it is \$20,602. Cash \$30,000. . . . Everything is included. . . . So give him this bag, which is \$50,000. Do you understand?” (Ruo Huang is telling Dong Jiang to give a bag containing approximately \$50,000 to Defendant Cai, to be transferred to China.) Later, Ruo Huang stated, “You need to make appointment with Ah Cai.” Dong Jiang replied, “I made it already. I am to deliver it to his home.” Ruo Huang then stated, “Ask him when was the 4 dollars [\$40,000] wired out.”
60. Ruo Huang also participated in using false companies to import counterfeit goods. For example, on or about April 8, 2011, Ruo Huang asked Dong Jiang, “Do you still remember my ‘EZ Import Export?’” Dong Jiang replied, “Yes.” Ruo Huang stated, “I remember that I ship[ped] one with that. Do you still remember what kind of merchandise that we used to ship under that Company?” Dong Jiang, after saying that he didn’t remember the Co-Conspirators shipping under that name, asked, “[W]hat did we ship[?]?” Ruo Huang replied, “Was it the last one that we used this company for the yellow Timberlands?” Ruo Huang then asked, “[W]hat company did we use for the shipment of the yellow [Timberlands] from last time? It needed extra work done over here.”

Da Yi Huang, a/k/a “Boss,” a/k/a “Da Nian” (“Da Yi”)

61. Da Yi Huang, a/k/a “Boss,” a/k/a “Da Nian” (“Da Yi”) resided in or around Staten Island, New York. Da Yi was one of the directors of the Smuggling Scheme. Da Yi negotiated pricing for counterfeit merchandise; made payments for the counterfeit merchandise; and participated in deciding which counterfeit products should be ordered from China.
62. Da Yi helped shape strategy for the Co-Conspirators. For example, on or about March 18, 2011, Da Yi spoke with Dong Jiang. First, Da Yi discussed the predicament of Defendant Guo, who had been refused re-entry into the United States because of issues with his visa. Da Yi stated, “I called Guo Ning the other day and he said that he went for an interview for a visa.” (Da Yi is describing a call that he had with Guo, and what Guo is doing to try and re-enter the United States.) Dong Jiang replied, “He said that he needs to do the visa interview again. He went back to China, right?” Da Yi said, “I think this visa interview is easy.” Dong Jiang replied, “Easy, right? He should be able to come, right? Da Yi replied, “Those interviews are easy. He’ll get it right away. We’ll have extra help when he gets back.”
63. Dong Jiang and Da Yi also discussed an importer of counterfeit goods. Dong Jiang stated: “That guy called yesterday and said that he has a bag on hand. I’m afraid that it is

going to be the same junk bag like last time.” Da Yi replied, “It’s okay because lately the business is good, as long as the price is good.” (Da Yi is saying that the quality of the counterfeit goods that the Co-Conspirators are trafficking is less important than the price of those goods.) Later, Dong Jiang stated, “All his stuff is junks and old.” Da Yi, though, responded: “Sell the old style as junk and sell it cheap. That’s where you can make the money and make fast money. The others take too long. You have to wait at least a month or so to get it. Right now, we should find few people and tell Lao Mo [Defendant Jian Zhi Mo] to give them only when they pay in full beforehand.”

64. Da Yi also assisted in the importation of counterfeit goods destined for Co-Conspirator C.Z. For example, on or about May 9, 2011, Da Yi told C.Z., “The container still has problem. The driver went to drag it. When it was dragged to the door, two Customs cars followed it. I had seen this before. The driver was arrested before under the same situation. Since he had that experience, he just left the container there and drove the head of [the] truck out. Then I called the person in charge, who said don’t be nervous, he will let the non-Asian guy drag it tomorrow.” C.Z. replied, “Then it was under watch.” Da Yi then stated: “It is not definite. It happened the same thing last time. My own stuff, the UGGs, [at the] end of last year.”
65. Da Yi also cautioned others to be careful and advised how to avoid detection by law enforcement. For example, on or about June 1, 2011, Da Yi spoke with Dong Jiang, and stated, “Be very careful about the people around no matter how familiar. They are especially those who were arrested before because they may carry tape recorder to record your talking and also to be witness in the court, don’t think the people around will not do it to you, you don’t know if they carry a tape recorder or not. Ah Long will not do it for he was not arrested.” Da Yi also stated, “[W]e have to be very careful. [Defendant] Fei Ruo [Huang] said the same. If something happens to one person and he admits it, it will involve many people. Last time Ah Long, his wife and an Hispanic went to Queens Boulevard to the 101 warehouse and Ah Long left earlier. When Song Wu went there, they were arrested, the Hispanic was asked to identify who the boss was. Ah Long was lucky to get away with it. Otherwise they would be in serious trouble.” Da Yi then warned Dong Jiang about interacting with a particular person named “Yi Hong”: “Be careful about Yi Hong. He hates us. . . . He will get information from the people around you and record it. It’s very easy for him to get information of you, [C.Z.] and your cell phone numbers. So try to avoid meeting with him.” Da Yi later stated, “He was given 12 months to come up something or he will be locked up. So he will present the recording. And the people who were arrested all become witnesses. So be careful. Watch out for the people around you.”
66. As discussed, on or around June 23, 2011, Co-Conspirator Y.H.L. was arrested by local authorities while carrying approximately \$150,000 in his car. Before the Co-Conspirators learned that Y.H.L. had, in fact, been arrested, and had not simply absconded with the Co-Conspirators’ money, Da Yi spoke with Dong Jiang about the course to be followed: Da Yi stated, “Go discipline him first. Or find [a] person to beat him up today.” Dong Jiang repeated, “Find [a] person to beat him up. . . . Rough him up.” Da Yi said, “Find him first. . . . Go drive around his house to see if his car is there.”
67. The next day, on or about June 24, 2011, Da Yi cautioned Dong Jiang to take steps to avoid law enforcement: Da Yi advised to “clean everything up first,” to not “stay at home tonight,” and told Dong Jiang not to use his phone any more. Moreover, Da Yi stated, “don’t go to the Fuzhounese guy to buy the phones.” Da Yi also told Dong Jiang that Ruo Huang “should drive around in case that she is followed,” and that “Patrick” Siu

should be “warned.”

Wu Lin a/k/a “Lin Wu” (“Lin Wu”)

68. Wu Lin, a/k/a “Lin Wu” (“Lin Wu”) resided in or around Maspeth, New York. Lin Wu’s primary role was to distribute counterfeit goods in the New York area to wholesalers. These goods were purchased primarily in connection with Yan and others.
69. Lin Wu and Yan discussed the logistics and “processing” of counterfeit goods. Yan asked, “How come you are so busy?” Lin Wu replied, “Because I want it before the Christmas . . . There is so much merchandise delivered today.” Yan asked, “There is no one there helping you?” Lin Wu replied, “My older sister is here. The Hispanic person cannot handle it.” After Yan suggests that more people are always better than less, Lin Wu replied, “You don’t understand. If the person knows how to do it, it is okay. If he does not know how, he will do it in vain and slow it down.”
70. Lin Wu often arranged delivery of counterfeit goods – even if the quantities were smaller than what the Co-Conspirators usually distributed. For example, on or around February 6, 2011, Lin Wu called Defendant Yan, and stated, “The person I told you yesterday. He called. . . . A Wenzhou fellow needs 30 or 40 boxes of merchandise. Can we deliver it?” Yan replied, “30 or 40 boxes? Call Hai Dong to ask him. Or just ignore it. How can we deliver for only 30 or 40 boxes?” Lin Wu replied, “That’s why I wanted to ask you.”
71. Lin Wu also discussed the difficulty of making a living selling – as opposed to importing – counterfeit goods, and the timing and contents of shipments. For example, on or about February 9, 2011, Lin Wu spoke with Yan, and stated, “The people who sell bags in Chinatown, they make only \$100 or \$200 per day. They can’t even pay their rent.” Later in the conversation, the two discussed the movement of counterfeit merchandise, and the timing of shipments. Yan asked, “The next batch of merchandise, when do you want it to come?” Lin Wu replied, “You decide it.” Yan then stated, “If the weather gets warmer, how about on [February] 20 something?” Lin Wu replied, “Wait and see. Wait after the Valentine’s Day.”
72. Yan and Lin Wu also discussed what specific types of counterfeit merchandise sold better than others, and what types the Co-Conspirators wanted. For example, on or about December 17, 2010, Lin Wu stated, “Remember the merchandise we ordered from China last time, it contained lots of merchandise that we don’t like.” Later in the conversation, Yan instructed, “You need to prepare Polo merchandise for me. Does this batch of merchandise contain Polo?” Lin Wu replied, “Yes, it contains Polo.” Yan then stated, “Next time when you place [the] order, tell them to attach the thin bottle wrapping paper, for customers like it. Some brands’ merchandise have the thin wrapping paper, some don’t.”
73. Lin Wu was also involved in the logistics of distributing goods in furtherance of the Smuggling Scheme with Hai Yan. For example, on or about March 12, 2011, Hai Yan called Lin Wu, and stated, “The merchandise will arrive on Monday.” Lin Wu confirmed, “It’ll be out on Monday?” Hai Yan then stated, “I spoke with Hai Dong, I said we’ll divide up the merchandise. . . . We get our share of merchandise and rent a storage space.” Lin Wu observed, “Then we need to find a good place.” Yan then told Lin Wu that she has fraudulent identifications which Lin Wu can use in furtherance of the Smuggling Scheme, just in case Lin Wu does not have his own fraudulent identification: “If you need a good ID for a storage, no good license to rent, I will mail one to you. . . . I

have an ID here, I have someone else's ID." Lin Wu replied, "Alright."

Wai Kwok Ho, a/k/a "William," a/k/a "Willie" ("Ho")

74. Defendant Wai Kwok Ho, a/k/a "William," a/k/a "Willie," ("Ho") resided in or around Flushing, New York. Ho controlled a trucking company called "Pride Express, Inc."
75. Through this company, Ho handled the transportation of numerous tractor trailers filled with counterfeit merchandise from the Port to warehouses controlled by the Co-Conspirators.
76. In or around October 2009, Ho was interviewed by law enforcement officers. Ho stated that prior to his current location, his business had been located at 320 Elizabeth Avenue, Newark, New Jersey. During the Smuggling Scheme, numerous containers filled with counterfeit goods were delivered to this address, and UC-1 picked up money for UC-1's "services" from Co-Conspirators at this address.
77. Ho spoke frequently with Dong Jiang to arrange shipments of counterfeit goods, and at times explained why he occasionally had to be circumspect. For example, on or about December 14, 2010, Ho stated, "[A] little while ago, my partner [wa]s right next to me and I didn't want to talk about a lot of things. . . . So when asked about things, I didn't dare to speak too loud or too much." Then Ho referred to business: "[F]or tomorrow I will have a driver around noon."
78. Ho also appeared to have imported counterfeit goods himself in the past, and so knew the market. For example, on or about January 23, 2011, Dong Jiang asked whether Ho thought "this Counterfeit iPhone 4, do you think there's people wanting it?" Ho replied, "Ah . . . tell you the truth, I did it before. Over here there isn't much people wanting it. Maybe in the southern America. There . . . people want[] it. If you need[,] I can ask [about] it for you." Later in the conversation, Dong Jiang asked about desirable counterfeit products, stating, "[I]s there any new things to do now?" Ho replied, "I need to ask." Dong Jiang stated, "Help me ask around, because you guys deliver container." (Dong Jiang is saying that in Ho's business, Ho is well-placed to know which counterfeit items sell the best.) Ho replied, "I will ask."
79. On or about January 24, 2011, Ho told Dong Jiang, "Things are going bad." Dong Jiang asked, "What's the matter?" Ho replied, "Ah . . . can't send you the container." Dong Jiang asked, "What?" Ho explained: "Can't send you the container. Being followed by the Customs." Ho explains that he will have to find a place to put the container, and elaborated: "This container I'm afraid . . . as soon as it came out, [the driver] knew being followed by the Customs."

Sze Ma, a/k/a "Timmy" ("Ma")

80. Sze Ma, a/k/a "Timmy," ("Ma") resided in or around Flushing, New York. At various times, defendant Ma worked for Pride Trucking, Defendant Ho's company, as a truck driver.
81. On or about May 21, 2010, UC-1 met with Defendants Ma and Wei Qiang Zhou, a/k/a "Ivan," a/k/a "Ah Qiang" ("Qiang Zhou") (the "May 21, 2010 Meeting"). UC-1 had previously told certain Co-Conspirators that UC-1 needed more truck drivers to transport counterfeit goods in furtherance of the Smuggling Scheme. During the May 21, 2010

Meeting, Ma and Qiang Zhou, and UC-1, discussed UC-1 hiring Ma and Qiang Zhou as truck drivers. UC-1 made clear that all of the trucks would contain counterfeit goods, and asked if both Ma and Qiang Zhou would be agreeable to driving containers loaded with this type of contraband. Each defendant acknowledged that they would be agreeable to driving such goods. Qiang Zhou stated, however, that he would not drive drugs or guns. Ma stated that he would be comfortable driving counterfeit goods, as he had driven trucks filled with counterfeit cigarettes in the past. Both Qiang Zhou and Ma stated that they did not want to drive counterfeit cigarettes any more, however, because the penalties were too severe and the risk was not worth the money. The three agreed that UC-1 would pay Qiang Zhou approximately \$500 per delivery, and that Qiang Zhou and Ma would split the \$500.

Wei Qiang Zhou, a/k/a “Ivan,” a/k/a “Ah Qiang” (Qiang Zhou)”

82. Wei Qiang Zhou, a/k/a “Ivan,” a/k/a “Ah Qiang” (“Qiang Zhou”) resided in or around Brooklyn, New York. Qiang Zhou’s primary role was to assist other Co-Conspirators in arranging for transportation of counterfeit merchandise.
83. Qiang Zhou met with UC-1 on several occasions. For example, on or about May 12, 2010, UC-1 met Qiang Zhou when UC-1 and others delivered a container of counterfeit goods to a warehouse controlled by the Co-Conspirators. Qiang Zhou arrived at a nearby location in a BMW registered to Defendant Ruo Huang. UC-1 then engaged Qiang Zhou in a recorded conversation, during which UC-1 outlined the nature of UC-1’s business moving counterfeit goods off the Port for Defendant Siu and others. UC-1 stated that the transportation involved truckloads of “the bags and the sneakers – the fake kind.” Qiang Zhou acknowledged that he would be willing to participate in the Smuggling Scheme to “make some money.”
84. As set forth above, Qiang Zhou took part in the May 21, 2010 Meeting with Defendant Ma and UC-1. In addition, on or about July 23, 2010, UC-1 met with Qiang Zhou at a restaurant in or around Staten Island, New York. During this meeting, UC-1 provided Qiang Zhou with approximately \$2,000 in cash for Qiang Zhou’s role in the delivery of four containers of counterfeit goods, pursuant to the arrangement agreed to at the May 21, 2010 Meeting.
85. Qiang Zhou frequently communicated with Dong Jiang, on intercepted communications, regarding the Smuggling Scheme. For example, on or about January 22, 2011, Dong Jiang asked whether Qiang Zhou had “closed the cell phone,” to which Qiang Zhou replied he had not. (Dong Jiang is asking whether Qiang Zhou had discarded his phone to avoid law enforcement detection.) Dong Jiang then told Qiang Zhou that a large quantity of counterfeit footwear had been seized, stating that “a lot of UGGs are dead.”
86. As another example, on or about February 15, 2011, Dong Jiang asked Qiang Zhou at what price the Co-Conspirators could sell a certain type of counterfeit footwear, and mentioned a price that was a small fraction of the retail price for that footwear: “The white ones . . . can we sell all of them for \$9.50?”
87. As noted, on or about June 23, 2011, Y.H.L. was arrested, and the Co-Conspirators erroneously thought that he had absconded with approximately \$150,000 of their money because Y.H.L. had failed to deliver it. Later that day, Dong Jiang spoke with Qiang Zhou, and asked Qiang Zhou if he could help obtain Y.H.L.’s address and phone number, in furtherance of Y.H.L.’s kidnapping: Dong Jiang asked, “If I give you a name, can you

check and find out his address and phone number?” Qiang Zhou replied, “It is hard unless you have the driver’s license.” Dong Jiang stated, “The driver’s license is a different person. I just want to find his address. Do you still have those tools? Help me find several people to fix [Y.H.L.]” Qiang Zhou repeated, “Fix.” Dong Jiang replied, “Ran away with my money.” Qiang Zhou asked, “A lot?” Dong Jiang replied, “Yes. You help me arrange one or two people and keep an eye on that person. After I find out the address, you send two strangers there and kidnap him.” Qiang Zhou replied, “No problem.”

88. The next day, on or about June 24, 2011, Dong Jiang and Qiang Zhou spoke again about Y.H.L. Qiang Zhou asked, “exactly how much did you give” to Y.H.L., and Dong Jiang replied, “180,000.”⁵ Later, Qiang Zhou asked if the “money is for the beard guy?” (Qiang Zhou is asking whether the money Y.H.L. had was destined for UC-1, in furtherance of the Smuggling Scheme.) Dong Jiang replied, “Yes, he was waiting there and no one showed up.”
89. By on or around June 25, 2011, the Co-Conspirators had learned that Y.H.L. had not absconded, but rather had been arrested. On or around that day, Dong Jiang spoke with Qiang Zhou again, and told Qiang Zhou that Y.H.L. had been arrested. Qiang Zhou stated that law enforcement had begun to arrest the Co-Conspirators: “They started their operation.” Dong Jiang replied, that there was “no options but to shut off the phone and bail him out.” Dong Jiang then stated that it was “good that [Qiang Zhou] didn’t go over there and kidnap someone these [past] two days.”
90. On or about June 26, 2011, Dong Jiang and Qiang Zhou spoke again. Qiang Zhou told Dong Jiang that his car had been stolen, and Dong Jiang asked whether Qiang Zhou was “safe.” Qiang Zhou replied that Dong Jiang should avoid those connected to Y.H.L. and let Defendant Ning Guo handle the fallout from Y.H.L.’s arrest – advising, “do not . . . hang out with those people that’s involved and let Guo Ning handle everything.”
91. On or about June 30, 2011, Dong Jiang and Qiang Zhou tried to come up with a false story to explain why Y.H.L. would have had over \$100,000 in cash on him when he was arrested. Dong Jiang asked, “S***, what kind of the business has that much [in] cash transactions?” Qiang Zhou replied, “I don’t know what type of business that needs that much cash transaction. Besides the business that sells scrap [metal]. Some of it’s collecting cash. It’s impossible for restaurants and 99 cents business to have that much cash.” Later, after Dong Jiang asked when Y.H.L. might be released from custody, Qiang Zhou replied, “normally it’s so quick on these matters. One night [in jail and then] you are out. It depends on what he says [to authorities]. . . . Right now you don’t [know] what he is saying in there.” Dong Jiang replied, “The more you say the worse it gets.”

Ning Guo, a/k/a “Danny,” a/k/a “Peter,” a/k/a “The Beijing Kid” (“Guo”)

92. Defendant Ning Guo, a/k/a “Danny,” a/k/a “Peter,” a/k/a “The Beijing Kid” (“Guo”) resided in or around Elizabeth, New Jersey and in China. Guo coordinated and facilitated the receipt and distribution of counterfeit goods once they arrived at the Port.⁶ Guo was

⁵ As noted, the actual amount seized from Y.H.L. was approximately \$150,000.

⁶ Guo is also charged by complaint, dated March 1, 2012, in the related case of United States v. Guo, et al., Crim. No. 12-7060 (CLW).

recorded dozens of times discussing the Smuggling Scheme with other Co-Conspirators.

93. On several occasions, Guo went to warehouses controlled by the Co-Conspirators and obtained containers of counterfeit goods that had been imported as part of the Smuggling Scheme. For example, on or around July 20, 2010, UC-1 engaged in a call with Defendant Siu, during which Siu directed UC-1 to deliver a container of counterfeit goods to a warehouse located at or around 316 Cox Street, Roselle, New Jersey, (the "316 Cox Warehouse") and to ask for "Peter," later determined to be Defendant Guo. On or about July 21, 2010, UC-1 delivered the container to the 316 Cox Warehouse. Guo was there, and he and UC-1 engaged in conversation regarding the container filled with counterfeit goods.
94. Similarly, on or about August 5, 2010, Siu again directed UC-1 to deliver a container of counterfeit goods to the 316 Cox Warehouse, and stated that another Co-Conspirator would pay UC-1 for the container. On or about the same day, UC-1 delivered the container to the 316 Cox Warehouse, where Guo took possession of the counterfeit goods and then left. UC-1 then waited for the Co-Conspirator to pay UC-1. After UC-1 had waited for approximately two hours, UC-1 called Siu. Siu stated that the other Co-Conspirator's car had broken down. Siu then told UC-1 that "Peter" would be arriving with UC-1's payment. A short time later, Guo returned to the 316 Cox Warehouse and handed UC-1 a package that contained approximately \$75,000. This money was payment for four different containers that the Co-Conspirators had passed through as part of the Smuggling Scheme – (a) a fee of \$15,000 each for three containers, and (b) \$30,000 of the \$50,000 for a fourth container that had been released. Guo explained that the Co-Conspirators owed UC-1 an additional \$20,000, and would make good on the next delivery of counterfeit goods.
95. On or about August 6, 2010, UC-1 delivered another container to the 316 Cox Warehouse. Guo again met UC-1, and handed UC-1 a package that contained approximately \$35,000. This money, Guo explained, represented the \$15,000 for the August 6, 2010 container, as well as the \$20,000 owed from the transaction on or about August 5, 2010.
96. Subsequently, UC-1 and Guo communicated numerous times regarding the Smuggling Scheme. For example, on or about August 24, 2010, UC-1 delivered, unannounced, a container of counterfeit merchandise to the 316 Cox Warehouse. UC-1 then called Guo, and told Guo that UC-1 had been unable to reach Defendant Siu. UC-1 stated, "I have a box here. Do you want it or not? I need to know soon. . . . It's a fifty-three foot container. You understand?" Guo asked, "Whose is it?" UC-1 replied, "It's not yours. It's a different one I got, you understand?" Guo then asked, "What is it?" UC-1 replied, "It's sneakers, handbags, Coach wallets. It's all different shit. You understand." Guo replies, "Yes, what kind of stuff?" UC-1 then stated, "It's all different stuff. I got to get rid of it. It was supposed to be just handbags. I opened it up and its got labels in it, Coach hand bags, Coach wallets, all different shit. It's fifty-three feet." Guo then asked, "How much do you want for it?" UC-1 replied, "I will work the price out with [Defendant Siu]." Guo replied, "I need to call my Boss."
97. Minutes later, Guo called UC-1 and stated, "We'll take it." UC-1 then asked, "Do you want to come down here and check it out?" Guo replied, "No."
98. On or about August 27, 2010, Guo met with UC-1 at the 316 Cox Warehouse. Guo handed UC-1 a package containing approximately \$95,000. This money constituted a

\$50,000 payment for the container discussed on or about August 24, 2010, as well as three \$15,000 payments for other containers.

99. Guo also supervised the alteration, or “processing,” of counterfeit goods to make them appear more authentic. For example, on or about December 15, 2010, Guo spoke with Defendant Dong Jiang. Defendant Dong Jiang asked, “How many containers have been processed?” Guo replied that “one has been processed, one is still not done.”

Jian Zhi Mo, a/k/a “Jimmy” (“Mo”)

100. Defendant Jian Zhi Mo, a/k/a “Jimmy” (“Mo”) resided in or around Flushing, New York. Mo worked closely with Defendant Guo and others to facilitate the alteration, storage, and transportation of counterfeit goods in furtherance of the Smuggling Scheme.⁷
101. For example, on or about December 5, 2010, Guo called Mo and asked, “How many boxes of UGG can be loaded into a full truck?” Mo replied, “Two hundred and something.” Guo then said, “Count it when you unload them.” Mo replied, “Okay.”
102. On or about December 15, 2010, Defendant Guo spoke with Mo, and told Mo, “You should help me inspect making sure that KGG on the outer box must be removed.” (Guo is telling Mo that the counterfeit goods being “processed” – in this case, counterfeit “UGG” brand footwear – need to have an outer box removed before they are delivered to customers. This outer box bears the imprint of “KGG,” not “UGG.” The inner box is printed with the counterfeit mark of “UGG.”) Mo replied, “Okay, okay. Remove. Remove. Remove. Okay.” Mo then added, “But, but is not so beautiful looking.” Guo replied, “Ah, no problem if it is not beautiful looking. Just be sure to remove it. You know.” Mo replied, “Okay.” Guo then concluded, “Never let one go out of the net.” (Guo is telling Mo to be sure to alter every box.)
103. Also on or about December 15, 2010, Guo provided Mo with instructions as to what counterfeit goods to load onto a truck destined for wholesalers: “Load the truck. 20 in sand color, 100 in black from the new container in which the goods have been processed.” Mo replied, “Tell me how to load.” Guo stated, “200 boxes in black, 150 boxes in Timberland, 140 boxes in coffee color”
104. Mo also paid UC-1 and others several times for UC-1’s “assistance” in removing containers filled with counterfeit goods from the Port. As just one example, on or about March 28, 2011, UC-1 communicated with Defendant Siu, and stated that UC-1 wanted to pick up payment of approximately \$55,000 for two containers of counterfeit goods. UC-1 then went to the area of 320 Elizabeth Avenue, Newark, New Jersey. Mo then arrived at the 320 Elizabeth Avenue location, driving a white Honda Accord registered to Mo, along with approximately two other individuals. One of Mo’s passengers then handed UC-1 a plastic bag containing approximately \$55,000 in cash.

Dao Feng Shi, a/k/a “Ah Dao” (“Dao”)

105. Defendant Dao Feng Shi, a/k/a “Ah Dao” (“Dao”) resided in or around Palisades, New Jersey. Dao’s primary role was to purchase counterfeit goods from the Directors of the

⁷ Mo is also charged by complaint, dated March 1, 2012, in the related case of United States v. Guo, et al., Crim. No. 12-7060 (CLW).

Smuggling Scheme.

106. On or about December 21, 2010, Defendant Lin Wu spoke with defendant Yan. Lin Wu stated, "208, short 2 boxes. When Ah Qiang [Defendant Qiang Zhou] delivered, it is only 208 boxes." Yan replied, "His merchandise is 310 boxes. Have you subtracted his 310 boxes?" Lin Wu replied, "Yes. We still need to give him over \$1,000. After Ah Dao and I get our money, the rest is your money. Do you leave your money with Ah Dao?" (Lin Wu is stating that a share of the money to be made belongs to Dao, and asks Yan whether she has lent money to Dao.) Yan replied, "Yes. He said he needed to use it."
107. As another example of Dao's involvement, on or about December 22, 2010, Dong Jiang spoke with Yan to account for a batch of counterfeit goods, noting that Dao's sales would comprise about \$25,000. Dong Jiang stated, "I will work up to have \$60,000 and wire it first." Yan replied, "Yes. You work up to have \$60,000 and wire it. You need to work out the account of this batch of merchandise clearly." Dong Jiang replied, "After I wire it, I will deduct yours. You will wait after Ah Dao sells the merchandise, right?" Yan replied, "Yes. . . . Let me tell you. When Ah Dao is done, it is over \$25,000 over there."
108. On or about January 22, 2011, Yan spoke with Dao, and discussed how various kinds of counterfeit goods were selling slowly. Yan stated, "Jordan is not being sold." (Yan is referring to a type of counterfeit Nike sneakers.) Dao replied, "Can't do anything. Prada and LV are not good either." Yan then said, "The white shoes are alright, but not profitable." Dao replied, "It's too early for white shoes." Yan stated, "We have to start now, but only go for about \$10, not profitable." (Yan's price is many times lower than the actual retail price for this type of footwear.) Dao replied, "You can have processed here [in the United States]." (Dao is showing awareness of the method of transforming counterfeit goods to display the name-brand labels.) Yan replied, "It's useless, the UGG were processed here; the label falls off right away." (Yan is providing some insight on the quality of the counterfeit goods that are "processed" in the U.S.) Dao then said, "Everyone else does it this way."
109. Later that day, Dao called Yan seeking specific types of counterfeit goods: He stated, "I'm looking for Burberry jackets, Lacoste shirts." Yan clarified, "Burberry what?" Dao replied, "Shirts, very inexpensive."
110. On or about March 14, 2011, Dao called Yan from Defendant Lin Wu's phone, and the two discussed space in which to store counterfeit goods. Dao stated, "Listen to me first. I don't like to share warehouse with the others. You know that, to share warehouse, it is only 50 percent." (Dao is telling Yan that if storage space is shared with others, there is a greater chance they will be detected by law enforcement.) Dao continued, "That's why I want to find a garage, a couple of them." Yan replied, "For garage, I'm afraid it will be too tough for the two of you when you move the stuff." Dao replied, "Moving is tough but it's okay. The important thing is the security." Later in the conversation, Dao indicated how close he felt to Defendants Dong Jiang and Lin Wu: "Let me tell you, either Lin Wu or Hai Dong, we are like family members. No matter, there are things we can discuss."
111. On or about March 24, 2011, Dao called Yan, and warned her about other counterfeit goods merchants who had recently been arrested: "Be careful when you make phone calls lately, either to China, or to [Dong Jiang]." Yan asked, "Why?" Dao replied, "Last night two persons doing perfume were arrested." Dao then provided the arrested persons' names, but warned, "It's okay for you to call me by that phone number. Don't mention

these words at all. Don't mention it to others on the phone." Yan asked again where the perfume merchants were arrested: "Where? Las Vegas?" Dao replied, "The persons were arrested in Las Vegas, but merchandise is from New York."

112. On or around November 18, 2011, Dao met with Co-Conspirator Yuan Feng Lai ("Feng Lai") in or around Elizabeth, New Jersey.⁸ Dao was observed giving Feng Lai a black plastic bag. Later that day, Feng Lai met with a UC to provide the UC money in exchange for the UC's "assistance" in obtaining counterfeit goods from the Port. Although Feng Lai was supposed to give the UC approximately \$100,000, Feng Lai stated that he only had approximately \$80,000. Feng Lai stated that in fact he had approximately \$70,000 prior to the morning of on or about November 18, 2011, but that one of the owners of the counterfeit goods (Defendant Dao) dropped off approximately \$10,000 to Feng Lai earlier that morning, for a total of approximately \$80,000.

Miao Tracy Zhou, a/k/a "Ah Mei," a/k/a "Ah Miao" ("Miao")

113. Miao Tracy Zhou, a/k/a "Ah Mei," a/k/a "Ah Miao" ("Miao"), resided in or around Queens, New York. Miao purchased and distributed containers of counterfeit goods, and also assisted the directors of the Smuggling Scheme in wiring proceeds of the Smuggling Scheme from the United States to China. Miao also took samples of legitimate goods to Chinese-based manufacturers of counterfeit goods, in furtherance of the Smuggling Scheme.
114. On or about December 15, 2010, Defendant Guo received a call from Co-Conspirator Feng Lai. Guo stated, "that container belongs to Ah Miao." Guo then stated, "When it arrives, let me know, I will go get some amigos." (Guo is telling Feng Lai that once the container arrives, he will pick up day laborers and put them to work making necessary alterations to the counterfeit goods.)
115. Later that day, Guo received a call from Miao, and told Miao that he was sending Miao a truck with a load of counterfeit goods: "I send the address over to one, it will arrive in about one hour." Miao then stated, "When it's all loaded, give me a call." Guo asked, "Jordan right?" (Guo is asking whether the counterfeit goods Miao is receiving are "Air Jordan" style counterfeit Nike sneakers.) Miao replied, "Yes." Guo then asked, "How many styles and colors?" Miao replied, "Four, a lot." Minutes later, Guo spoke again with Feng Lai, who was responsible for the transportation to customers, and told Feng Lai which goods Miao was to receive – Guo stated: "Ah Miao is Jordan."
116. On or about May 13, 2011, Defendant Miao traveled to China. Before she left, other Co-Conspirators discussed Miao's travel, and the manufacturers of counterfeit goods that Miao would visit while in China. For example, on or about April 14, 2011, Defendant Dong Jiang spoke with Defendant Yan. Dong Jiang stated, When Ah Miao goes to China, tell her to get the scarves and gloves. Yan asked, "What kind of scarves?" Dong Jiang replied, "Burberry scarves." Yan then clarified, "The counterfeit scarves?" Dong Jiang confirmed: "The counterfeit scarves and North Face gloves."
117. After Miao left for China, further conversations took place regarding the types of counterfeit goods she was negotiating for with the Chinese manufacturers. For example,

⁸ Feng Lai is charged by complaint, dated March 1, 2012, in the related case of United States v. Guo, et al., Crim. No. 12-7060 (CLW).

on or about May 19, 2011, Yan spoke again with Dong Jiang. Yan stated, “Ah Miao called and said that the gloves are 66 for a dozen; with the printing on them, it 67 for a dozen. So I called Lin Wu and he said that it depends on the quality of the gloves. If the gloves that she brought back are the styles [offered currently] then the price is high.” Yan then continued, “Ah Dao [Defendant Dao] told me that he got the one without the print for \$7 a dozen. She said that she is going to Guang Zhou to look for factory that makes shoes. She had found a factory but she doesn’t know much about shoes.”

Cheng Dong Xia, a/k/a “Dong Ge” (“Cheng Dong”)

118. Defendant Cheng Dong Xia (“Cheng Dong”) resided in or around Brooklyn, New York. Cheng Dong received large quantities of counterfeit goods from the directors of the Smuggling Scheme.
119. On or about March 16, 2011, Defendant Dong Jiang spoke with Defendant Ruo Huang about the quantity of counterfeit goods that Cheng Dong had purchased recently from other Co-Conspirators. Ruo Huang stated, “Cheng Dong said the he was going to give [Ruo Huang] the money for the 14 boxes from before. I told him that he should pay all together with the 101 boxes today. So all together is 6144 boxes.”
120. On or about April 6, 2011, Cheng Dong asked Ruo Huang when certain of his counterfeit goods would be delivered: “What time will it be today? He called to ask already.” Ruo Huang replied, “He said there is only 20 boxes and 3 numbers have run out.” Cheng Dong then stated, “It’s okay if something is missing. About when will it be delivered over?”
121. Later the same day, Cheng Dong called Defendant Dong Jiang. Cheng Dong reiterated, “It has to be delivered today.” Dong Jiang asked, “Can it be later?” Cheng Dong replied, “It’s okay to deliver it later. But it has to be delivered today. . . . And don’t deliver it at the time when it almost closes. He needs to pack it and mail it out in the afternoon.” (Cheng Dong is stating that the counterfeit goods are needed immediately, because, it appears, a Co-Conspirator will be repacking and shipping the counterfeit goods that day.)
122. The next day, on or around April 7, 2011, Ruo Huang spoke with Dong Jiang. The two discussed money from the Smuggling Scheme that Ruo Huang was to bundle together. Dong Jiang asked, “Who is from? Is it from Cheng Dong?” Ruo Huang replied, “No, I didn’t get Cheng Dong’s yet.” Dong Jiang replied, “Okay. You haven’t gotten it from Cheng Dong yet?” Ruo Huang replied, “Right. I’ll call him later. The other day he said that he had it at home, right?”
123. On or around April 27, 2011, Ruo Huang spoke with Dong Jiang again, and stated that “Cheng Dong is coming to Boss’s [Defendant Da Yi’s] house and he will bring the remaining \$11,000 something.”

Xiance Zhou, a/k/a “Ah Cai” (“Xiance Zhou”)

124. Defendant Xiance Zhou, a/k/a “Ah Cai” (“Xiance Zhou”) resided in or around Bayside, New York. Xiance Zhou’s primary role was to wire proceeds obtained from the Smuggling Scheme to accounts in China. Intercepted telephone calls revealed that Co-Conspirators in the Smuggling Scheme would drop off large sums of money to Defendant Xiance Zhou, Defendant Jian Chun Qu (“Qu”), and others – sums far in excess of \$10,000 at a time. Xiance Zhou, Qu, and others would then divide these large sums into

amounts of less than \$10,000, and wire the money – in increments of less than \$10,000 – to China and elsewhere to evade reporting requirements.

125. Xiance Zhou operated a money remitting business called “Chen Gong Trading,” and used the services of Group Ex Financial Corporation (“Group Ex”). At all times relevant to this complaint, Group Ex was a registered money transmitter conducting money transfers throughout the world – including to China – through a network of agents located in the United States. Accordingly, Group Ex was a domestic financial institution within the meaning of 31 U.S.C. §§ 5312 and 5313(a), and the regulations issued thereunder.
126. Pursuant to 31 U.S.C. § 5313(a) and its related regulations, when a domestic financial institution is involved in a transaction for the payment, receipt, or transfer of United States currency in an amount greater than \$10,000, the institution is required to file a currency transaction report (“CTR”) for each cash transaction, such as, by way of example, a deposit, withdrawal, exchange of currency or other payment or transfer by, through or to a financial institution.
127. CTR forms, which are filed with the Internal Revenue Service, require disclosure of, among other information, the identity of the individual who conducted the transaction and the individual or organization for whom the transaction was completed.
128. Based upon my training and experience, I know that many individuals involved in illegal activities, such as counterfeit goods smuggling and money laundering, are aware of the reporting requirements and take active steps to cause financial institutions to fail to file CTRs in order to avoid detection of the movement of large amounts of U.S. currency. Avoiding the filing of a CTR is prohibited by 31 U.S.C. § 5324(a)(1).
129. Pursuant to 31 U.S.C. § 5324, it is a crime for an individual to (a) “cause or attempt to cause a domestic financial institution to fail to file a report required under § 5313(a),” (b) “cause or attempt to cause a domestic financial institution to file a report required under § 5313(a) that contains a material omission or misstatement of fact,” or (c) “structure or assist in structuring, any transaction with one or more domestic financial institutions” for the purpose of evading the reporting requirements of 31 U.S.C. § 5313(a).
130. I reviewed bank records for a Group Ex account in the name of “Chen Gong Trading” (the “Group Ex Account”), which was used by Defendants Xiance Zhou and Qu. Based upon that review it appears that millions of dollars in U.S. currency was wired from the Group Ex Account, without filing the required CTRs on those funds.
131. Intercepted telephone calls indicate that Xiance Zhou was the “go to” money remitter for the Co-Conspirators. For example, on or about January 25, 2011, Defendants Lin Wu and Yan discussed wiring proceeds of the Smuggling Scheme to China. Lin Wu stated that Defendant Dong Jiang had been unable to wire money out of New York, because “it is very strict in New York lately.” Defendant Yan replied that “No one is wiring out money except for Ah Cai.” Lin Wu then stated that he, too, had wired money to China through Xiance Zhou, and that Xiance Zhou’s “place is cheap.”
132. On or around January 24, 2011, Defendants Yan and Dong Jiang spoke about wiring money to China through Xiance Zhou. Yan asked, “Can you call Ah Cai asking him to arrange it?” Dong Jiang replied, “I already told him. He said Wednesday [January 26, 2011]. I have rushed him.” Yan replied, “There is 6 dollars [\$60,000]. How is it to be wired?” Dong Jiang then stated, “6 dollars. Don’t worry. He will arrange it. Mine is

only 3 dollars [\$30,000].” Yan then stated, “How can you only have 3 dollars? Are you going to pay him only 5 dollars [\$50,000] for 2 containers?” Dong Jiang replied, “Okay. I will wire him more.”

133. This call referred to “Wednesday,” January 26, 2011, and Yan and Dong Jiang discussed wiring at least approximately \$60,000, stating that Xiance Zhou would “arrange it,” but that Dong Jiang might “wire . . . more.” As part of the investigation, law enforcement officers examined the records of Chen Gong Trading’s remitting accounts, including the Group Ex Account. On or about January 26, 2011, a total of approximately \$70,100 was wired through the Group Ex Account. However, there was not a single transmission over \$10,000. Rather, the wires were divided into approximately 16 different transactions. Each transaction was for a round number. Law enforcement officers then examined the records of the Group Ex Account for the entire week from on or about January 24, 2011 through on or about January 31, 2011. Not a single transmission was over \$10,000. Moreover, not a single CTR was filed by Chen Gong Trading for any transactions relating to Yan, Dong Jiang, or any other Co-Conspirator during this period.
134. As another example, on or about February 19, 2011, Dong Jiang called Xiance Zhou, and asked, “You called me last night?” Xiance Zhou replied, “I wanted to ask who is it for?” Dong Jiang replied, “For my Da Yi.” (Dong Jiang is referring to Defendant Da Yi.) Xiance Zhou repeated, “For Da Yi.” Dong Jiang then stated, “Total for Da Yi is \$120,000, with the other two, it’s \$140,000. The other \$20,000 has already been wired.” Xiance Zhou replied, “Alright. I got it.”
135. As part of the investigation, law enforcement officers have examined the records of Chen Gong Trading in and around February 2011. These records reflect that between on or about February 19, 2011 and on or about February 21, 2011, a total of approximately \$149,900 was wired through the Group Ex Account. However, there was not a single transmission over \$10,000. Rather, the wires were divided into approximately 34 different transactions. Each transaction was for a round number. Law enforcement officers then examined the records of the Group Ex Account for the entire week from on or about February 19, 2011 through on or about February 26, 2011, and again, not a single transmission was over \$10,000. Moreover, not a single CTR was filed by Chen Gong Trading for any transactions from Dong Jiang, Da Yi, or any other Co-Conspirator during this period.
136. Indeed, law enforcement officers examined the records of the Group Ex Account for more than approximately one year, and discovered that although the Group Ex Account was used to make approximately 3,816 transfers to China, with a total of approximately \$19,959,970 transferred, not a single wire transmission for that entire time period was for more than \$10,000. Moreover, not a single CTR was filed during this entire period by Chen Gong Trading for any transactions involving any of the Co-Conspirators.

Jian Chun Qu (“Qu”)

137. Defendant Jian Chun Qu (“Qu”) resided in or around Bayside, New York. Qu was partners with Xiance Zhou, and Qu’s primary role was to transmit the proceeds of the Smuggling Scheme to China.
138. Qu worked with Xiance Zhou to wire money to China in a structured fashion. For example, on or around January 18, 2011, Defendant Dong Jiang called Xiance Zhou, and asked, “Have you wired the \$30,000 of mine?” Xiance Zhou asked, “You mean it was

wired through.” Dong Jiang clarified, “I don’t know. I’m just checking.” Xiance Zhou then called for Qu, who evidently was in the same room with Xiance Zhou, and Xiance Zhou stated, “Okay. Jian Chun [Qu], Ah Dong [Defendant Dong Jiang] asked you to wire the \$30,000. When will it be wired? Tonight? Yes. He said today.” Dong Jiang then asked, “It will be wired today? Thank you.”

139. As part of the investigation, law enforcement officers examined the records of Chen Gong Trading’s remitting accounts, including the Group Ex Account. On or about January 18, 2011, a total of approximately \$54,200 was wired though the Group Ex Account. However, there was not a single transmission of over \$10,000 – and certainly no single transaction for approximately \$30,000. Rather, the wires were broken up into approximately 13 different transactions. Each transaction was for a round number. In addition, no CTR was filed for any Co-Conspirator.
140. On or about February 17, 2011, Dong Jiang called Xiance Zhou, and asked, “Chen Li’s \$20,000, have you wired it?” Xiance Zhou replied, “Uh, call Jian Chun’s [Defendant Qu’s] phone number, okay? . . . He handles it.” (Xiance Zhou is stating that Qu would be handling the wire of approximately \$20,000.) Jiang replied, “Oh, I’ll call and ask.”
141. On or about March 23, 2011, Dong Jiang called Qu. Dong Jiang began by stating, “There was over \$70,000 given to you last week. Have you wired it?” As the call progressed, Qu stated that while the money had not yet been wired, it would be wired soon. Dong Jiang then stated, “Next week I will give you 20 [\$200,000] dollars. Arrange it for me.”
142. March 23, 2011 was a Wednesday. Law enforcement officers examined the records of the Group Ex Account for the entire week from on or about Monday, March 28, 2011 through Sunday, March 3, 2011. Not a single transmission was for over \$10,000. However, a total of approximately \$430,100 was transmitted through the Group Ex Account in approximately 100 transactions during that week. None of those transactions resulted in a CTR being filed for any Co-Conspirator during this period.

GOVERNMENT
EXHIBIT
A



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124

**GOVERNMENT
EXHIBIT
B**



GOVERNMENT
EXHIBIT
C



SUPER
HEAVY

STYLE NO: 1
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MEAS: 45X37.5X64.5CM

COLOUR: WHITE/WHITE
MEAS: 45X37.5X64.5CM

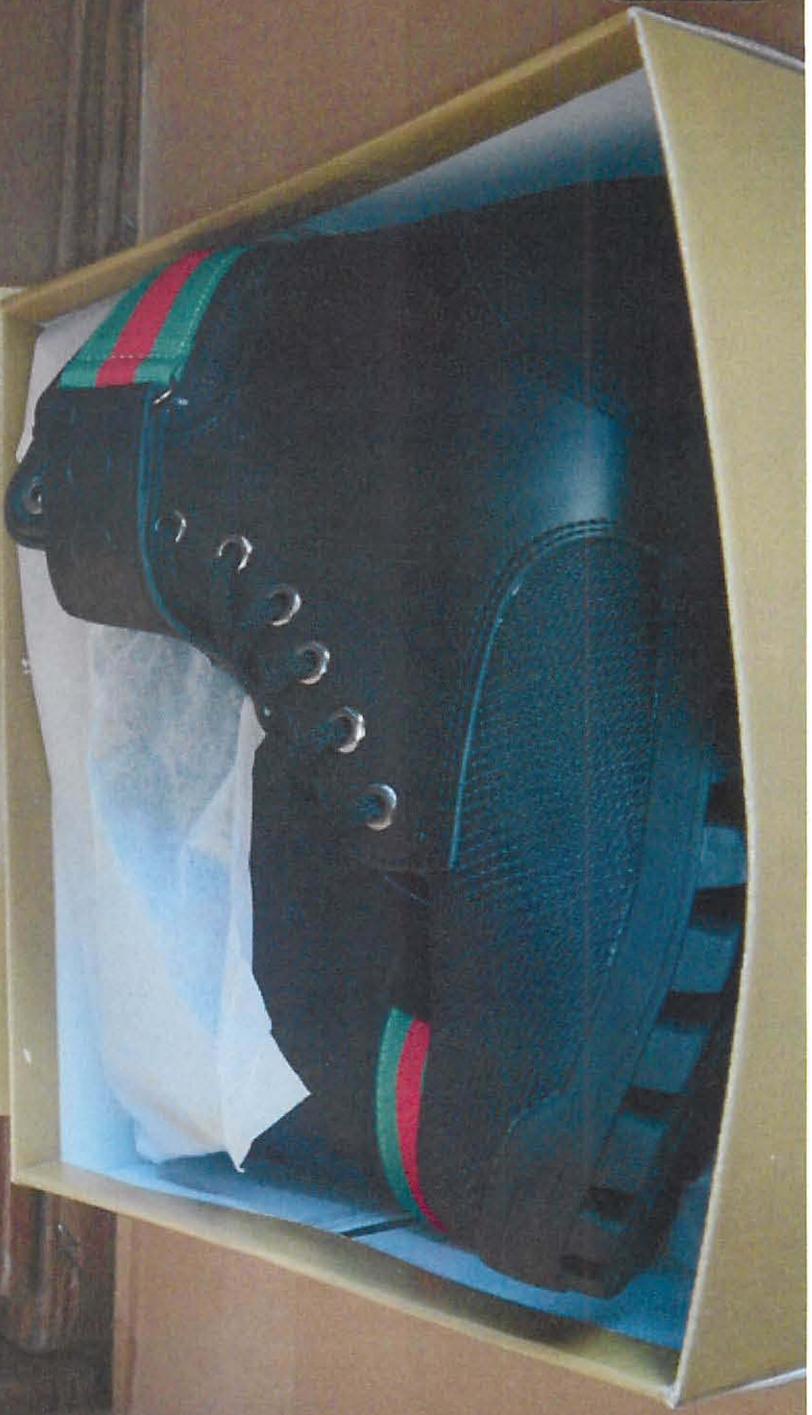
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GOVERNMENT
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EXHIBIT
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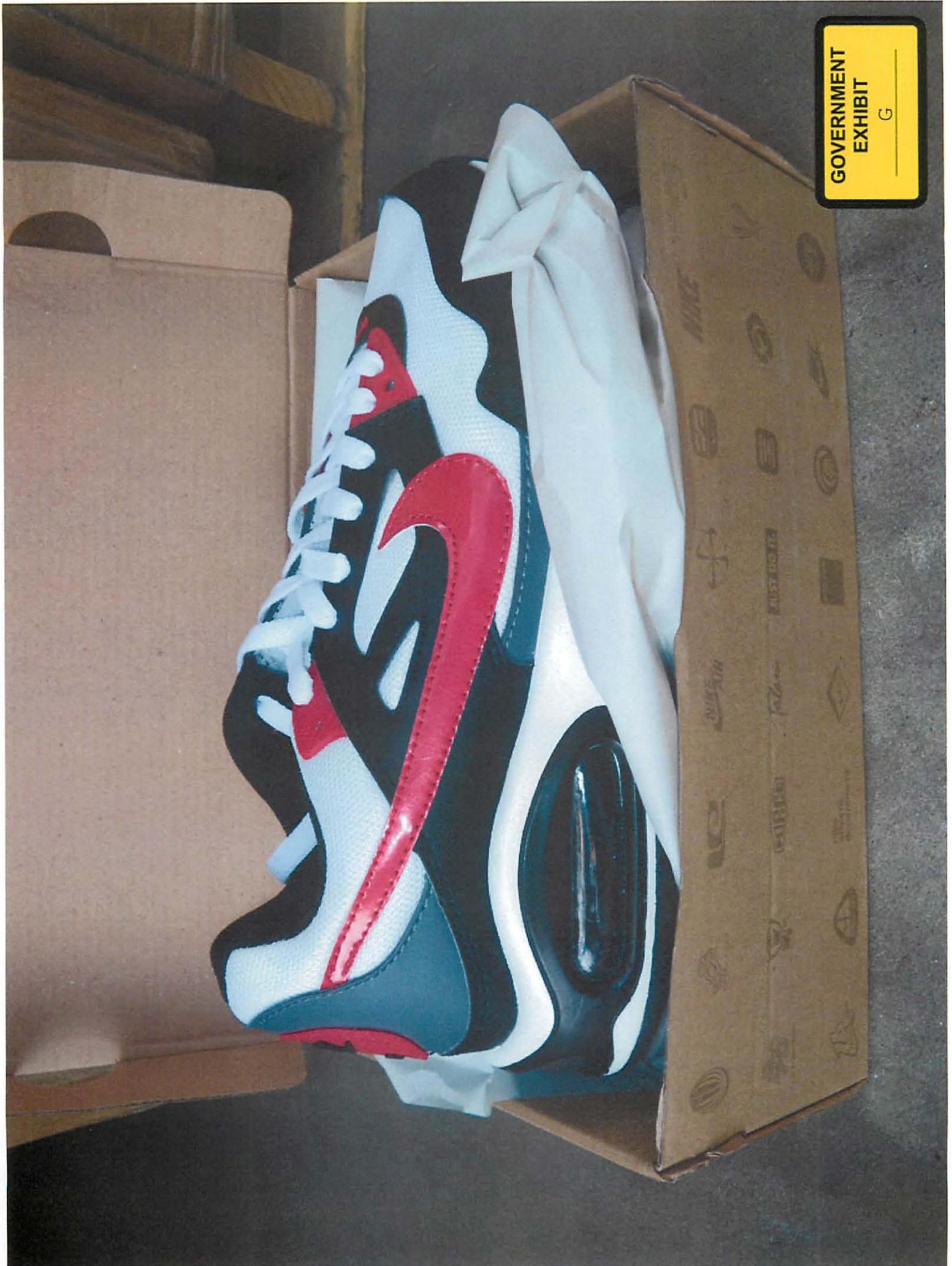


LACOSTE

Small white label with illegible text.

Small white label with the Lacoste crocodile logo and the word "LACOSTE" printed below it.

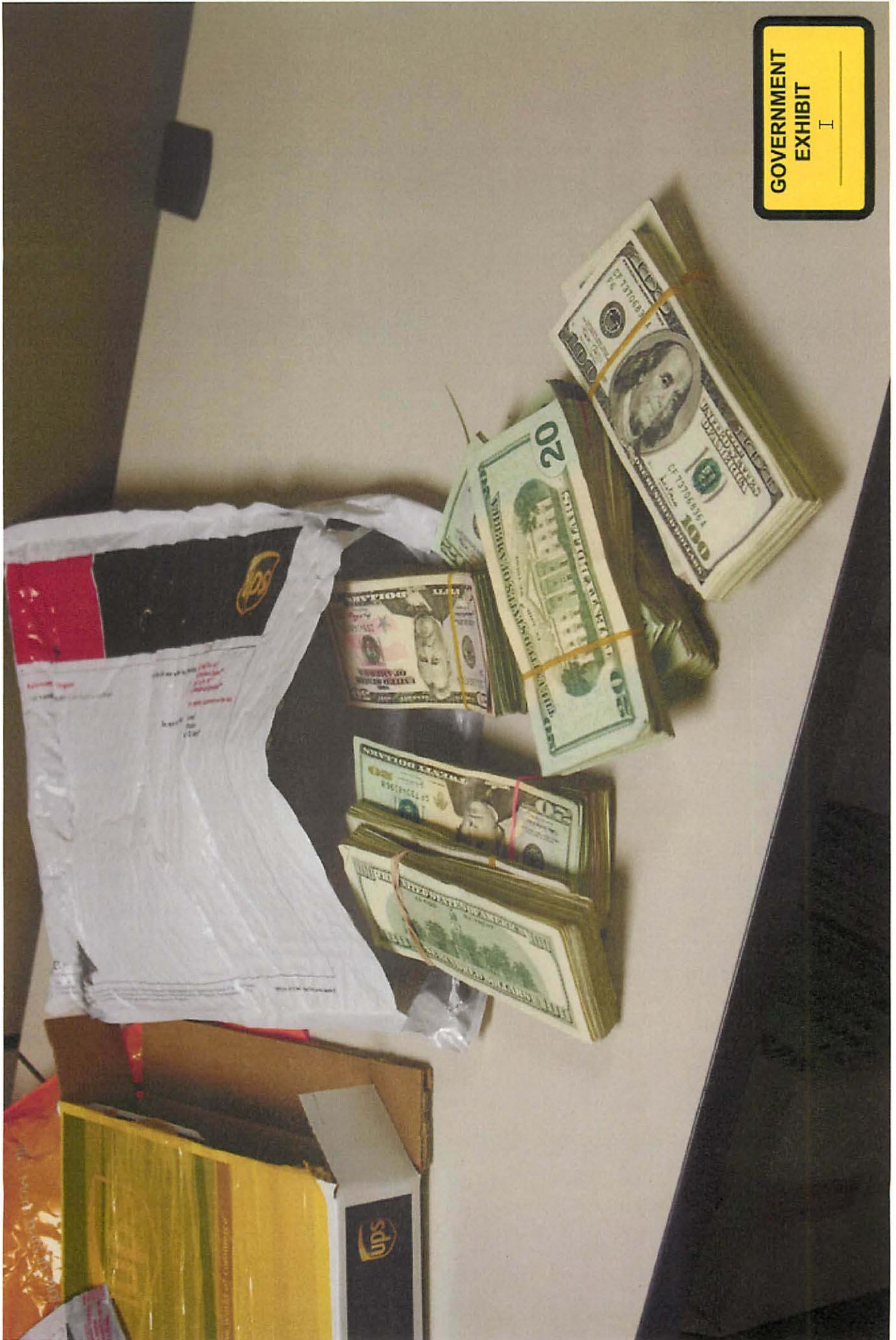




GOVERNMENT
EXHIBIT
G



GOVERNMENT
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I





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