

-----Original Message-----

From: Perreard, Jean-Luc

Sent: Friday, July 24, 2009 4:03 PM

To: Reynolds, David A

Cc: Payne, Steve

Subject: FW: Letter to IBCS re Seizure of Winchester Export Lights in Malta

FYI - next time we have problem with these two customers - we will most likely terminate them.

-----Original Message-----

From: Jones, Simon

Sent: 2009-07-17 15:25

To: Perreard, Jean-Luc

Cc: Pekhazis, Fadoul; Rahme, Fady; Raydan, Karim

Subject: RE: Letter to IBCS re Seizure of Winchester Export Lights in Malta

Dear Jean-Luc,

Please see attached a copy of the letter delivered to IBCS this afternoon.

Thank you again for your help.

Best regards

Simon

-----Original Message-----

From: Perreard, Jean-Luc

Sent: Thursday, July 16, 2009 9:55 AM

To: Pekhazis, Fadoul; Jones, Simon; Rahme, Fady

Cc: Raydan, Karim

Subject: RE: Letter to IBCS re Seizure of Winchester Export Lights in Malta

Glad I could help - and good to see that we are aligned.

-----Original Message-----

From: Pekhazis, Fadoul

Sent: 2009-07-16 10:37

To: Jones, Simon; Perreard, Jean-Luc; Rahme, Fady

Cc: Raydan, Karim

Subject: RE: Letter to IBCS re Seizure of Winchester Export Lights in Malta

Simon,

I will the letter as Jean Luc proposed, go ahead and draft it in my name and I will discuss and deliver it to Bassam Audeh Fadoul

-----Original Message-----

From: Jones, Simon

Sent: 16 July 2009 09:06

To: Perreard, Jean-Luc; Rahme, Fady

Cc: Pekhazis, Fadoul; Raydan, Karim

Subject: RE: Letter to IBCS re Seizure of Winchester Export Lights in Malta

Dear Jean-Luc,

Thank you very much for your proposed draft. As you say, this letter needs to be worded in such a way that it can be disclosed to OLAF.

Fady, do you think any fine tuning is required, given our strong relationship with IBCS?

Please can we discuss today.

Best regards

Simon

-----Original Message-----

From: Perreard, Jean-Luc

Sent: Wednesday, July 15, 2009 1:15 PM

To: Jones, Simon

Cc: Pekhazis, Fadoul; Raydan, Karim; Rahme, Fady

Subject: RE: Letter to IBCS re Seizure of Winchester Export Lights in Malta

Simon,

Please find attached a draft letter as discussed over the phone this morning. Feel free to amend accordingly - but the message has to be clear and to the point. The fact of the matter is aht if we do not do it - in case of repetitive seizures - OLAF will place both customers + IBCS on the blocked customer list - and this for 5 years.

As soon as the letter is sent - please provide me with a copy so that I could - if needs be - use it to demonstrate OLAF that we are proactive in addressing such matter.

Thanks and regards,

JLP

-----Original Message-----

From: Pekhazis, Fadoul

Sent: 2009-07-15 12:18

To: Jones, Simon; Perreard, Jean-Luc

Cc: Raydan, Karim

Subject: Re: Letter to IBCS re Seizure of Winchester Export Lights in Malta

Dear both,

I believe the last paragraph should mention that if this incident happens one more time we will be obliged to discontinue our shipments of this brand to both customers All the Best Fadoul

PS: I do not mind signing the letter

----- Original Message -----

From: Jones, Simon

To: Perreard, Jean-Luc

Cc: Pekhazis, Fadoul

Sent: Wed Jul 15 11:02:08 2009

Subject: Letter to IBCS re Seizure of Winchester Export Lights in Malta

Dear Jean-Luc,

Further to our telephone conversation this morning, please would you advise on the appropriate wording of a letter to IBCS following the seizure of more than 50 cases of Winchester Export Lights in Malta. I attach a copy of the initial draft received from Worldwide Duty Free. In my view the final paragraph of the draft letter does not go far enough.

I note your suggestion that given the seriousness of the issue the communication should be signed by the regional president (as is the case in other regions). Accordingly I am copying in Fadoul.

You can call me at my desk any time today.

Best regards

Simon

+44 1932 372033

Intelligence Report

Turkey

Based on our intelligence, Customs in Mersin, Turkey opened container # CRXU 203776-9 on Saturday 26 July. It contained 4 brands, predominantly 350 master cases of Winchester Export Lights Two other transit containers were also opened, however these turned out to be Karelia Slims & Rothmans, not our brands.

The details of the container holding the Winchester:

CONTAINER NO: CRXU 203776-9

SHIPPER: CIRCUIT LOGISTIC LIMITED SAL (OFFSHORE) BEIRUT LEBANON

CONSIGNEE : MCS DENIZCILIK NAKLIYAT TURIZM SAN.VE TIC LTD STİ.

ÇAKMAK CADDESİ GÖKÇE İŞ MERKEZİ NO:9 KAT 7 MERSİN TURKEY

NOTIFY : MIEL TRADING

VESSEL : MV ICE SUN

FLAG: GIBRALTAR

PORT OF LOADING: BEIRUT

LOAD: 425 MC

MERSIN TRANSIT TO IRAQ

There was no count done in front of us , as it was a Saturday afternoon, Customs were not prepared to empty it out, however we were initially advised that there were 200 MC of Winchester in the Container. Subsequently, the invoicing details have now been released to us, and there are actually 350 master cases.

Samples were sent to Trier for lab analysis. The Lab later confirmed that they received a carton of Winchester Export Lights CPB with US Vol. HW (QA code: 322-2008) - which was identified as Genuine product from Turkey produced on June 11, 2008 with Pack code: FFH11B05

Our records show that these goods were made in Turkey on 11 June 08, and the entire production run was sold to IBCS in Sharjah and delivered FOB Izmir Factory to Interworld SARL (Zone France Depot No 6105 in Beirut).

The seller is Circuit Logistics Ltd. Sal, Beirut, invoiced to Miel Trading Ltd. Famagusta Northern Cyprus. The cigarettes were en route to Dohuk, Iraq.

From: Reynolds, David A

Sent: Sunday, March 07, 2010 2:27 PM

To: Douglas, Craig; Van Adrichem, Willem; Carter, Andy; Robalo Da Silva, Vitor Manuel

Subject: IBCS Diversion of WINSTON to JK International

Gents – following update on this group.....

According to Habib GULZAR, habib@habibgulzar.com, speaking in early September 2009, "reliable sources in Dubai" provided the attached documents dated 23 August 2009 confirming the sale of 272 cases of WINSTON by IBCS Trading and Distribution, PO Box 23489, Sharjah, UAE; Tel: +971 65723078, +971 65725109; email ibcs.sharjah@audeh-group.com to Jalat KHAN. [NB: IBCS is owned by Issah AUDEH and is a key distributor for WWDF, while Jalat Khan, principally through his firm JK International is a well known smuggler principally targeting the Iran market and also the owner of Arya Tobacco, which reportedly has manufactured counterfeit international brands. Khan also reportedly was linked to the February 2006 diversion of 450 cases of SEVEN STARS from Afghanistan to the Philippines via the firm Yau Lee Holdings. Habib Gulzar is the authorized ADF distributor in Afghanistan and receives shipments via TWLT. End NB]

Per the attached documents, a person named P. VENUGOPAL issued the letter to Khan on behalf of IBCS confirming the sale. Venugopal advises Khan that the 272 cases would be shipped to him via forwarder Steinweg Sharaf FZE, in Dubai. He also attached for Khan Invoice Number 1276 dated 19 August 2009 for the cigarettes, an Original Certificate of Origin issued by the Sharjah Chamber of Commerce, and a Packing List.

The Invoice indicates that the cigarettes were sold by IBCS to Afghan Duty Free, Najeeb Zarab Complex, Kabul, Afghanistan, Tel: +937 9833333 and were to be delivered via Steinweg Sharaf FZE, PO Box 17013, Jebel Ali Free Zone, Dubai; Tel: +971 506858367.

The terms are FOB Dubai at US\$263 per case of WINSTON identified as produced in Switzerland 73 cases of WINSTON Filter KS Soft B/E No. 1-1-51-2904, 25 cases of WINSTON Filter Soft B/E No. 1-1-51-5987, 77 cases of WINSTON Lights KS Box B/E/ No. 1-1-51-5987, and 97 cases of WINSTON Ultra Lights Box B/E/ No. 1-1-51-5987. Total price is cited as US\$71,536.00 payable to IBCS Trading and

Distributing, USD Account Number 052 400 260 070727 013 at Blom Bank – France, Sharjah, UAE.

According to Gulzar,

- In 2007, Gulzar purchased back 300 cases of SSCL from Jalat Khan in Dubai from the stocks which he had smuggled out of Afghanistan to the Philippines market. Gulzar claimed that Khan has been involved in smuggling out 1000's of SEVEN STARS CUSTOM Lights to Philippines and Taiwan for which JTI has the records in their files.
- Khan together with the owner of Concord Tobacco (his cousin) is involved in producing fake cigarettes in Dubai. (NB: Concord Tobacco has been raided several times in the past five years and found to be counterfeiting JTI and Imperial Tobacco brands. End NB)
- Khan was also involved in importing fake MARLBORO from China
- Khan's purchase of 272 cases of WINSTON is likely bound for the Iran market.

Another source provided the following details on the members of the IBCS group possibly involved in diverting and/or smuggling JTI cigarettes:

Petros VARDAS – petros.vardas@audeh-group.com and possibly vardas.petros@audgroup.com

Issa AUDEH – ibcs_cy@audgroup.com and audeh.issa@audgroup.com

Bassam AUDEH – audeh.bassam@audgroup.com

Issa Michael MATALKA – mid-east@nol.com.jo

From: Reynolds, David A
Sent: Sunday, March 07, 2010 2:28 PM
To: Reynolds, David A; Douglas, Craig; Van Adrichem, Willem
Subject: IBCS and Jalat Khan

Despite diversions identified in August 2009, ADF passed along the following and attached request from IBCS to sell to Jalat Khan.

David A. Reynolds
Vice President
Brand Integrity Global Operations
JT International (Asia Pacific) Limited
Direct: +852 2585 9388
Mobile: +852 9189 2093
Fax: +852 2506 4556

Suite 4205-11, Tower One, Times Square
1 Matheson Street
Causeway Bay, Hong Kong

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From: Warburton, Simon
Sent: Wednesday, February 03, 2010 1:39 AM
To: Reynolds, David A
Cc: Francis, David
Subject: Jalat Khan

Dear David,

I have recently received a request from IBCS to supply Afghan Duty Free Ltd, the Vice President of this company is Jalat Khan. I am aware of previous communication you have had with Sumidasan, where you have stated that there is sufficient doubt about Khan's connections and dealings to reasonably preclude us from doing business with him either directly or indirectly.

This is the initial response we gave to IBCS in October 2009. Last week they brought up the subject once more and have provided various documentation of reference. IBCS personally recommend this customer.

I would appreciate if you could review the attached documentation and advise if this changes your recommendation.

I appreciate your support on this.

Kind Regards

Simon Warburton

From: Carter, Andy
Sent: Thursday, February 04, 2010 2:24 AM
To: Warburton, Simon
Cc: Francis, David; Reynolds, David A
Subject: FW: Jalat Khan

Dear Simon.

Dave Reynolds forwarded me a copy of your note regarding Jalat KHAN, and asked me to respond being familiar with some of his links and connections. My understanding is that you require this additional information on Khan in order to assess whether it is appropriate for JTI to enter into a business relationship with him / and or his company. This is in addition to the background information already supplied, and which still stands.

I would therefore comment per the below:

I have no comment on the Jalat Khan Docs 1 attachment other than to say, I am aware that the Afghan Chamber of Commerce supported, by means of a letter, a bogus MEMPHIS trademark application sometime around the 2004 – 2005 period, to a known Middle Eastern entity, therefore any support from this direction, needs to be treated with caution. I cannot vouch for the other supporting letters in that attachment.

With regard to Jalat Khan Docs 2, there are a number of companies there that are associated with, and trade directly with, Jalat Khan and his company, that we are familiar with, being Oriental, SUTUL & Karelia. Not mentioned in the attachment, but noted in some of the original correspondence with Sumida san, is a business relationship with Freddy Tay of Trading Gateways in Singapore. I have highlighted Oriental as an example from the list, and expanded on Trading Gateways.

Trading Gateways. This company continues to send Jalat Khan diverted Asian DF BAT product on a regular basis, typically delivered into Jebel Ali port in the first instance. The latest development is that Tay is now sending diverted ESSE, a KT&G brand, from an unknown source market, to Khan, in addition to the diverted BAT products. Our sources tell us they have also seen small amounts of PMI product being sourced for delivery to Khan. We have not seen JTI product being moved.

What is perhaps of more concern though to JTI, is that Tay, through Trading Gateways, has a business relationship with Johnny LEE who operates out of Hong Kong and trades in diverted product.

Lee was recently offered the equivalent of 2 containers of WINSTON to be diverted out of the domestic Philippine market until we intervened in that particular deal. If this series of shipments had been detected entering the EU, the potential fine for JTI was over \$4 million USD if this transaction had gone ahead!

Oriental Tobacco

Oriental is run by Tony D'Souza a known player in the counterfeit / smuggling business. Oriental have links not only with Trading Gateways, but also links into some major global counterfeiters and smugglers, including, but not exclusively, Shyam LAKHYANI, Bassam ZEINI, & Ozbekoglu Ticaret.

Lakhyani of America Import Corporation was recently arrested in Panama for counterfeit and smuggling offences, including JTI group brands. This was as a result of an extended BATFE and local Panamanian law enforcement investigation, to which we provided support. His extended family however, continue to be involved in cigarette smuggling in Latin America highlighted by the seizure of 2 containers, packed with nearly 2000 master cases of cigarettes concealed under a cover load, that we seized as late as last month, in Iquique, Chile.

Zeini is a UAE based smuggler and counterfeiter of note who has targeted JTI brands as recently as late last year. He has good connections in China and also the Philippines. He has played a major role in the smuggling of cigarettes, in and out of the EU, with the implications for JTI that that carries.

Ozbekoglu is a Mersin, Turkey based trader who not only has links with Zeini & Lakhyani above, but also business connections with other major counterfeit and smuggling syndicates. Ozbekoglu

was the consignor of 2 containers of counterfeit SOVEREIGN seized in Malta & Italy in late 2008. Ozbekoglu continue to trade in diverted International brands, including JTI brands we believe are sourced from Duty Free.

I trust the above assists. Any queries, please let me know.

Regards

Andy

From: Carter, Andy
Sent: Monday, March 01, 2010 8:59 PM
To: Reynolds, David A; Douglas, Craig
Subject: Fw: Yemen Operator

The below is subject to a notice recall!
I guess he realises he should have come through you first, so fyi for now but ill have a look in the system the morrow anyhow.
A

From: Freige, Mazen
To: Carter, Andy
Sent: Mon Mar 01 19:51:17 2010
Subject: Yemen Operator

Dear Andy

My name is Maz and I am the Trade Marketing Manager for the Middle East, based in the Weybridge office.

Our distributor across the Middle East, IBCS, is recommending that JTI products are sold to an operator who owns a DFS in Sanaa Airport Departures, & in Aden Airport Arrivals and departures, in Yemen.

The operator is called Al-Shuaa Trading. The owner (or general manager) is called Ali Yehya Al-Hindi.

As with all the Middle East, the operator will be a customer of IBCS.

What would you need me to supply you with in order for you to be able to give me feedback with regards this operator?

Another operator, Al Coan, with a shop in Sanaa airport Departures, has JTI's approval (through a BAP).

Like Al Coan, Al Shooa will also be subject to volume quotas by JTI.

Best Regards Maz

From: Sumida, Shigeyuki
Sent: Friday, September 11, 2009 8:27 AM
To: Reynolds, David A
Cc: Buckley, Judy
Subject: FW: Winston sales to Mr Jalat Khan

Dear Dave,

Long time no see! Hope this mail finds you well.

As you recall, we had an issue in 2007 caused by Jalat Khan as Habib explained below. I informed our colleagues of the incidents and reputation around him but due to strong suggestion from our customer we still continue business with them. According to Imperial Tobacco, BAT had issues with him therefore no business deal and Imperial also followed BAT..

As I will have meeting in GVA a week after next, I would like to raise this issue to our colleagues.

To discuss internally and make fair decision, could you kindly provide me with the information around him once again and your view as well?

Many thanks in advance and best regards,

Sumida

From: habib [mailto:habib@habibgulzar.com]
Sent: Wednesday, September 09, 2009 7:27 PM
To: Sumida, Shigeyuki
Cc: Sam, Ji Cherng; hamid@habibgulzar.com; 'Gulhakim'; Takenaka, Atsushi
Subject: Winston sales to Mr Jalat Khan

Dear Sumida san,

Its been a while since we have spoken. How are you ? Hope all is well with you and your family. Here I am with another issue and as always looking for your guidance in resolving the same .

Through some reliable sources in Dubai we were able to obtain the copies of the documents confirming the sales of 272 cases of Winston cigarettes to Mr Jalat Khan in the month of Aug through IBCS Trading. I have attached the copies of the documents supporting the same.

Highlighting the points from the fact file and his track records for your reference

- You may recall in the year 2007 we had purchased back 300 cases of SSCL from Mr Jalat Khan in Dubai from the stocks which he had smuggled out of Afghanistan to the

- Philippines market. In fact he has been involved in smuggling out 1000's of Seven star custom light to Philippines and Taiwan for which JTI has the records in their files.
- Mr Jalat Khan together with the owner of Concord Tobacco (his cousin) is involved in producing fake cigarettes in Dubai.
 - Mr Jalat Khan was also involved in importing fake Marlboro from China
 - From our Sales & stock report you will see the market for Winston family is reasonably small as the market for these cigarettes are mainly for consumers who have migrated from Iran to Afghanistan. Our domestic market has just started to grow with the increase in the number immigrants from Iran.
 - His purchase of 272 cases of Winston for the Duty free market is not justifiable when you know by a fact that these cigarettes are mainly consumed by the immigrants from Iran. From his past track records the imports of such big quantities of Winston could be for smuggling it out to Iran.
 - Afghanistan being our territory we see ourselves most eligible for handling the duty free market in Afghanistan.

Dear Sumida san, I look forward to your response.

Thanks and regards,
Habib Gulzar

-----Original Message-----

From: Mid-east [mailto:mid-east@nol.com.jo]
Sent: Sunday, 27 June, 2004 14:57
To: Mulvey, Mark
Cc: Legendre, Muriele
Subject: Fw: U.P. Sources

----- Original Message -----

From: [Mid-east](#)
To: [Mark Mulvey](#)
Cc: [Legendre, Muriele](#) ; [Issa Audeh](#) ; [Bassam Audeh](#)
Sent: Saturday, June 26, 2004 12:32 PM
Subject: U.P. Sources

Dear Mark,,

Warm greetings from Jordan, hope you are OK and doing well.

Please do note the following UP sources.

AA] Mr. Ibrahim Al-Zoubi a Jordanian based in China who I met last week, he is involved so much in manufacturing U.P.'s in China (mainly Marlboro and Winston) to the Iraqi market and some goes to Dubai and then re-distributed, that is what he told me and he can get me the best best prices for any brand of cigarettes that looks better than the original, please find his full details as follows:-

**Golden Light (ASIA) Ltd.
Guangzhou Office**

Ibrahim Al-Zoubi
General manager
Mobile: 0086-13609602427
Address: R17/FB, Zhong Qiao Building No. 76
Xian Lieroad (M)
tel: 0086-20-87324702, 87324703
Fax: 0086-20-87320355
Hong Kong
Mobile 0085294734897
Jordan Mobile: 00962-79-5540194
E-mail: glasia99@mail.china.com
glasia99@hotmail.com

BB] Mrs. Ruth Litvin-Hill, she is based in Israel and is involved directly in manufacturing U.P cigarettes in china and she is distributing it in the Middle East and several other countries

Her full details are as follows:-

Ruth Litvin-Hill
Magen & Sport Semco 1980 ltd.
P.O.box 25032
HAIFA 31250
ISRAEL
Tel: 972-4-8378699
Fax:972-4-8387677

God bless you.

Very truly yours,
Eng. Issa Michael Matalka.

From: Reynolds, David A
To: Francis, David
Cc: Gunay, Cetin; Perreard, Jean-Luc; Monteith, Ian
Sent: Thu Mar 18 02:35:01 2010
Subject: RE: RE: JM Dolphin and DFS/Falcon - Panos ARGYROPOULOS

Dear David,

First I must apologize. BI should have been providing you support, passing you information on suspect shipments, and helping you vet your customers previously. This did not happen as it should and we will now endeavor to ensure that you are fully supported.

As for JM Dolphin, I defer to you – as well as any input JLP may provide – on how best to handle this customer in the near term. Dolphin is merely one – albeit the best known - of many companies used by various members of the Mavrikos family and we are not sure

at this point of the full extent of their activities, or law enforcement's interest in them. This is a priority for us.

We are also hoping to make headway as quickly as possible on identifying from where Argyropoulos is obtaining his supplies, although it appears we may have missed this most recent shipment.

It may be best that we arrange a meeting to discuss these issues and the best way to move forward, especially after we get the chance to "run the names" through our database and Cetin make some headway on his mapping exercise.

I cc Ian Monteith on this email. Ian is now running the BI diversions investigations program and will be helping coordinate our efforts to support you and your team.

All the best. - Dave

David A. Reynolds
Vice President
Brand Integrity Global Operations
JT International (Asia Pacific) Limited
Direct: +852 2585 9388
Mobile: +852 9189 2093
Fax: +852 2506 4556
Suite 4205-11, Tower One, Times Square
1 Matheson Street
Causeway Bay, Hong Kong

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From: Francis, David
Sent: Thursday, March 18, 2010 1:20 AM
To: Reynolds, David A
Cc: Gunay, Cetin; Perreard, Jean-Luc
Subject: RE: RE: JM Dolphin and DFS/Falcon - Panos ARGYROPOULOS
Sensitivity: Confidential

Dear Dave,

Please find attached, Athanassiou sales data to Shipschandlers for 2009, TME details of Greece Shipschandlers. Additional customer details are below.

It is our intention to block all sales to J.M. Dolphin due to the information which you have provided. Would you please confirm that there are no time constraints on taking such action due to your investigation?

We shall also be reviewing our business with the other Greece customers within this channel.

I expect to receive further information regarding the sourcing of product from Latin America to Masri Shipping by end of this week.

Regards,
David.

GDFS SA
23rd klm Attica road
Ag. Stephanos
14565
Tel: 0030 210 6269400
ypatsourakis@dutyfreeshops.gr
Mr. George Patsourakis

Hellenic Distributions SA
Gravias 37
18545 Piraeus
Tel: 0030 210 4632018
alouvros@dutyfree.gr
Mr. Aris Louvros
e-mail address:

NKE
Sachtouri 11
18536 Piraeus
Tel: 0030 210 4522485
nke1@tellas.gr
Mr. Thomas Tsipas

Meridian SA
L. Athinon 120
18545 Athens
ggeorgak@meridian.gr
Ms. Georgia Georgakopoulou
Tel: 0030 210 5154742

Mavrikos Imports SA
Naxou 7
18541 Kaminia
Piraeus
Tel : 0030 210 4813064
mavrikos@otenet.gr

Mr. George Mavrikos

JM Dolphin SA
Spetson & Ipolitou 1
18538 Piraeus
Tel: 0030 210 4537947
jmdolphin@jmdolphin.gr
Mr. Nikos Mavrikos

Handrinos
Nea Selefkia
46100 Igoumenitsa
Tel: 0030 26650 27571
chandrino@hol.gr
Mr. Kostas Handrinos

Cosmatos Bross
Ioannou Koleti 5
54627 Salonica
cosmatos@otenet.gr
Mr. George Cosmatos
Tel: 0030 2310 528262

G. Tsoukatos
Athanassiou has stopped relations as from December 2009 for financial reasons.
His address is:
Akti Miaouli 73
18537 Piraeus
Tel: 0030 210 4186641
gvt@ath.forthnet.gr

From: Reynolds, David A
Sent: Tuesday, March 16, 2010 2:17 AM
To: Francis, David
Cc: Perreard, Jean-Luc
Subject: RE: RE: JM Dolphin and DFS/Falcon - Panos ARGYROPOULOS
Sensitivity: Confidential

Dear David,

We will begin the databases reviews immediately. It would be most helpful to us, if possible, to obtain the full names, street addresses, telephone numbers, faxes, and email addresses of each firm and their principal contacts with us (sales persons or firm principals). As you can imagine, many of these traders use many different firms and entities so it's best to check their main contact details as well just to be on the safe side.

Many thanks - Dave

David A. Reynolds
Vice President
Brand Integrity Global Operations
JT International (Asia Pacific) Limited
Direct: +852 2585 9388
Mobile: +852 9189 2093
Fax: +852 2506 4556
Suite 4205-11, Tower One, Times Square
1 Matheson Street
Causeway Bay, Hong Kong

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From: Francis, David
Sent: Tuesday, March 16, 2010 12:39 AM
To: Reynolds, David A
Cc: Perreard, Jean-Luc
Subject: RE: RE: JM Dolphin and DFS/Falcon - Panos ARGYROPOULOS
Sensitivity: Confidential

Dear Dave,

Ming Lee and I had decided to request a check on all our customers via your database so we are very much aligned.

The structure of our customer base, level 1,2, and 3 is currently being updated in TME and all TM's were advised that this had to be completed by April 15th.

I suggest that I arrange for you to receive level 1 this week, levels 2 and 3 after April 15th.

In the meantime I would like to focus on Greece. I attach details of level 1, 2, and 3 customers.

I also attach details of customers who have received the stock shown in the pictures. The range and volume of the brands involved suggest that, if supplied via one source, that this would be Weitnauer Duty Free Carribean. I shall forward a list of their customers tomorrow.

Many thanks for your support in these matters.

Regards,
David.

From: Reynolds, David A
Sent: Friday, March 12, 2010 3:57 AM
To: Francis, David
Cc: Perreard, Jean-Luc
Subject: RE: JM Dolphin and DFS/Falcon - Panos ARGYROPOULOS
Sensitivity: Confidential

Dear David,

Sorry we haven't had the chance to chat yet. I just want to bring you up to date. In addition to the unauthorized sales of our cigarettes to/from JM Dolphin and DFS Dardanelles Shipstore/Falcon, it does now appear that Panos ARGYROPOULOS of Masri Shipping has managed to get his hands on a fairly sizable amount of our cigarettes. Our source claims that Argyropoulos obtains similar numbers about every two months or so. I think its important we find the source of these sales and close this down.

Following is the list and prices that Argyropoulos is currently offering. I also attach some pictures he provided. We are running an investigation now in order to try and get access to this shipment. Any insights you may add based on your review of the pictures would be most welcome. I know you confirmed previously that we have no sales relationship with Argyropoulos, but it may be worthwhile at this point for BI to do a full run of the names and details of all your customers and their principal buyers via our database, just to ensure none of them show up as being known as entities we should be careful about. JM Dolphin obviously is the case in point. This firm and its principals are known smugglers, regularly traffic in counterfeits of our brands, and are investigative targets of OLAF and other enforcement agencies. I must apologize since we should have approached you on this earlier and offered to run these sorts of checks to ensure the likes of Dolphin never got – or stayed – on our customer list.

As you know, we do regular checks for Sumida-san, as well as JT-HK, and just recently advised him again about dealings with JK International, which purportedly obtained some of our cigarettes last year from IBCS, and also now regularly smuggles sizable amounts of other cigarette company brands into Iran.

Panos ARGYROPOULOS – 9 March 2010 Offer

CAMEL FF Ks Box 10M – 76 cases – US\$385 per case
CAMEL FF Ks Box 8M – 12 cases – US\$306.50 per case
CAMEL Lights Ks Box 10M – 60 cases – US\$410 per case
WINSTON FF Ks Box 10M – 35 cases – US\$390 per case
WINSTON Lights Ks Box 10M – 35 cases – US\$390 per case
Swiss MARLBORO Red Ks Box Big HW - 50 cases at US\$545 per case
Total = 268 cases

All the best. - Dave

David A. Reynolds
Vice President
Brand Integrity Global Operations
JT International (Asia Pacific) Limited
Direct: +852 2585 9388
Mobile: +852 9189 2093
Fax: +852 2506 4556
Suite 4205-11, Tower One, Times Square
1 Matheson Street
Causeway Bay, Hong Kong

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If you are not named addressee and/or you have received it in error, please notify us immediately so that we can arrange for its return.

-----Original Message-----

From: Francis, David
Sent: Monday, March 01, 2010 8:29 PM
To: Reynolds, David A
Subject: RE: JM Dolphin and DFS/Falcon

Dear Dave,

Thanks for this.

Details of our Greece distributor below who is also responsible for the domestic market.

I am travelling for the next two days but would like to discuss with you how best to proceed.

Perhaps we can speak on Thursday.

Regards,
David.

Athanassiou SA
63, Loutrou Street
13671 Acharnai Attikis
Greece

Mr. Evangelos Vassiliou
Tél: +30 211 1047700
Fax: +30 210 2445282
Email: Vassiliou_e@athanassiou.gr

-----Original Message-----

From: Reynolds, David A
Sent: Saturday, February 27, 2010 4:09 AM
To: Francis, David
Subject: RE: JM Dolphin and DFS/Falcon

David,

Please see attached from our investigators. It seems to confirm that JM Dolphin - in addition to DFS/Falcon - is selling outside agreed channels.

- Dave

----- Original Message -----

From: eugenia
To: Reynolds, David A;
Cc: BI Operations;
Sent: Sat Feb 27 11:00:22 2010
Subject: RE: Ozbekoglu Report

Hello David;

The invoice Baks mentioned is attached.

Best Regards Eugenia

From: Reynolds, David A
Sent: Friday, February 26, 2010 9:10 AM

To: Francis, David

Subject: Possible Diversions of JTI Cigarettes to/via Ozbekoglu Ticaret

Sensitivity: Confidential

Dear David,

I hope you are well.

You may have wondered why Willem and Steve have recently asked about some of our DF customers, notably DFS Shipstore.

For the last few months, we have been monitoring the activities of the company Ozbekoglu Ticaret in Mersin, Turkey, which seems to regularly trade in sizable amounts of our brands, as well as those of BAT, PMI, and often smuggled brands such as Jin Ling and Tradition. While our investigation remains in its early stages, we have noted both what appear to be sales from DFS, but also fairly regular movements of Winston, and especially large loads of Monte Carlo.

I copy below for your background some of the recent reports from our investigators and attach a copy of a proforma invoice issued by DFS. As you can imagine, the fact we have been able to obtain this information is sensitive and we need to protect our investigators involved in this case.

That said, I wonder if you can help us on several points.

We are having trouble reconciling the amount of product reportedly sold to DFS – and I presume its affiliated company Falcon Tax Free - and what they claim to have access to when selling to Ozbekoglu – over 200 cases of Winston.

We also cannot determine how the firm J.M. Dolphin Transit Stores S.A. and Panos Argyropoulos of the firm Masri Shipping acquire our brands. Are either of these firms customers of ours?

Lastly, given the references to large amounts of Monte Carlo for sale - 730 and 640 cases in different instances – I wonder if you could tell us if we sell such amounts (which may be consolidated over several months) to any one or several customers.

Many thanks for your help. All the best - Dave

Intelligence Report
URN: HCRR00003421

Subject: DFS Shipstore Issues Proforma Invoice to Ozbekoglu Ticaret Ofisi for 218 Cases of WINSTON and MORE

On 16 February 2010, Metin CAHIT (possibly aka Metin Cahit OZAR) and Hakan KAYALI of DFS ShipStore issued the attached (see below) Proforma Invoice for WINSTON, MORE, and KARELIA in favor of Ozbekoglu Ticaret Ofisi.

Source provided the following background on Cahit / Ozar:

Metin Cahit Ozar

DFS Gumruksuz Satyt Maeaza

Ytletmeciliei Ticaret A.T.

İ Ő letmeciliđ i Ticaret A.Ő .

Cumhuriyet Mah.Sahilyolu Cad.No:33

K.1. D.1 - 17110 Kepez/CANAKKALE

Phone : + 90 286 2636454 - 263 63 74. pbx

Fax : + 90 286 2636600 - 33

Gsm : 0533 231 46 02 - 0532 727 06 87

Telex : 0607 58142 falc tr - 58121 dzkc tr

mail : metin.cahit@dfsshipstore.com

DFS SHIPSTORE DARDANELLES

Sayı n, OZBEKOĐ LU Tİ CARET OFİ Sİ

Mersin Serbest Bolge. TURKİ YE

ORIGINAL PROFORMA INVOICE

DATE 16/02/2010

NO 201000001

REF CIGARETTES

NO	DESCRIPTION	QTTY	UNIT	U. PRICE	T. PRICE
1	Karelia Slims	35	Box	286,00 €	22.880,00 €
2	Karelia Blue 100'S	300	Box	206,00 €	120.640,00 €
3	Winston Blue KS FTB	200	Box	265,00 €	53.000,00 €
4	More Menthol 120'S	3	Box	375,00 €	1.125,00 €
5	Winston Red KS FTB	15	Box	265,00 €	3.975,00 €

GRAND TOTAL 553.Box 201.620,00 €

Intelligence Report

URN: HCRR00003406

Subject: Akin OZBEKOGLU Discusses Purchases and Shipments of JTI Brands with Hakan KAYALI of an Unknown Firm and Tassos LNU of JM Dolphin

On 12 February 2010, Hakan KAYALI passed to Akin OZBEKOGLU of Ozbekoglu Ticaret the following list of cigarettes and prices which he labeled as "Ozbekođ lu BAT and JTI proposal."

(NB: A web search - <http://www.shipping-international.com/companies/falcon-management-trade.html> - indicates that a Hakan Kayali is listed as the contact for Falcon Tax Free Store Management & Trade Inc. of Cumhuriyet Mah. Ataturk Cad. No.20/8 Kepez Dardan, Canakkale, Turkey; Tel +90 2862636454, +90 2862636633 (fax). End NB)

no
ürün
satış adeti
satış fiyatı
toplam

1
Winston Blue 50 crt
100
265.00 €
26,500.00 €

2
Winston classic 50 crt
15
265.00 €
3,975.00 €

3
Monte Carlo 50 crt
50
195.00 €
9,750.00 €

4
Rothmans Int. 25 crt
15
195.00 €
2,925.00 €

5
Dunhill Int. 25 crt
45
215.00 €
9,675.00 €

6

Pall Mall 25 crt

75

110.00 €

8,250.00 €

7

Viceroy 50 crt

100

200.00 €

20,000.00 €

8

Benson&Hedges 25 crt

60

220.00 €

13,200.00 €

9

Kent 100's 50 crt

5

335.00 €

1,675.00 €

10

More Filter 50 crt

5

395.00 €

1,975.00 €

More Mentholl 50 crt

3

395.00 €

1,185.00 €

TOPLAM

473

99,110.00 €

Also on 12 February, Ozbekoglu advised Tassos LNU at JM Dolphin that "I asked JTI conex for me."

(NB: "Conex" presumably is a reference to a container. The web site <http://www.jmdolphin.gr/> indicates that at Tassos KOROSSIS is the Sales Manager for J.M. Dolphin Transit Stores of Marina Zeas A2-A3-A4, Piraeus, Greece. End NB)
Tassos LNU then sent to Ozbekoglu the following list which is said would be the "next conex."

730 cases MONTE CARLO
190 cases WINSTON BLUE
80 cases WINSTON RED
13 cases WINSTON SLIMS
40 cases MARLBORO LI

Ozbekoglu also received the embedded picture of WINSTON Blue from an unknown sender.

Intelligence Report
URN: HCRR00003117

Subject: Recent Ozbekoglu Ticaret Ofisi - JM Dolphin Transit Stores SA Transactions

Nick LNU at J.M. Dolphin Transit Stores S.A. (NB: it is not clear if this is Nikos MAVRIKOS himself or another "Nick" at Dolphin) advised Akin OZBEKOGLU at Ozbekoglu Ticaret Ofisi that he would ship to him the following cigarettes:

170 C/S WINSTON BLUE
60 C/S WINSTON RED
80 C/S MARLBORO LIGHTS
430 C/S MONTE
60 C/S MONTE LIGHTS
8 C/S WINSTON S.SLIMS

Intelligence Report
URN: HCRR00003115

Subject: JM Dolphin Issues Invoices to Ozbekoglu Ticaret for 924 Cases of MONTE CARLO, WINSTON, and CAMEL

J.M. DOLPHIN TRANSIT STORES S.A.
SPETSON & IPPOLYTOU 1 / 185 38 PIRAEUS
Tel: 210 4538063 – 210 4537947 Fax: 210 4520050
E-mail: jmdolphin@jmdolphin.gr
VAT No: 094080370

To: OZBEKOGLU TICARET OFICI
3 SOKAK No 15

Piraeus 21/10/09
MERSIN - TURKEY

INVOICE No: /09
Cases description price total

560 MONTE CARLO 145.00 81200.00 Euro
80 MONTE CARLO LIGHTS 145.00 11600.00 Euro
640 92800.00 Euro

BANK DETAILS :
ROYAL BANK OF SCOTLAND
Akti Miaouli 61 PIRAEUS - GREECE
Account No : 250449-011
IBAN No : GR65 0640 0010 0000 0025 0449 011

J.M. DOLPHIN TRANSIT STORES S.A.
SPETSON & IPPOLYTOU 1 / 185 38 PIRAEUS
Tel: 210 4538063 !V 210 4537947 Fax: 210 4520050
E-mail: jmdolphin@jmdolphin.gr
VAT No: 094080370

To: OZBEKOGLU TICARET OFICI
3 SOKAK No 15 Piraeus 21/10/09
MERSIN - TURKEY

INVOICE No: /09
cases description price total
70 WINSTON RED 240.00 16800.00 Euro
180 WINSTON B. BLUE 240.00 43200.00 Euro
14 WINSTON slim BLUE 275.00 3850.00 Euro
20 CAMEL blue KSF 305.00 6100.00 Euro
284 69950.00 Euro

BANK DETAILS :
ROYAL BANK OF SCOTLAND
Akti Miaouli 61 PIRAEUS - GREECE
Account No : 250449-011
IBAN No : GR65 0640 0010 0000 0025 0449 011

J.M. DOLPHIN TRANSIT STORES S.A.
SPETSON & IPPOLYTOU 1 / 185 38 PIRAEUS
Tel: 210 4538063 !V 210 4537947 Fax: 210 4520050
E-mail: jmdolphin@jmdolphin.gr

VAT No: 094080370

To: OZBEKOGLU TICARET OFICI
3 SOKAK No 15 Piraeus 21/10/09
MERSIN - TURKEY

Conex :

PACKING LIST

cases description	total
70 WINSTON RED X 500	35000 Pkts
180 WINSTON B. BLUE X 500	90000 Pkts
14 WINSTON slim BLUE X 500	7000 Pkts
20 CAMEL blue KSF X 500	10000 Pkts
284	142000

Intelligence Report
URN: HCRR00003110

Subject: Panos ARGYROPOULOS Selling JTI WINSTON and CAMEL to Akin Bey Dik of Ozbekoglu Ticaret

On 21 October 2009, Akin Bey Dik of Ozbekoglu Ticaret agreed to buy a 40-foot container packed with a mixed load of duty-free WINSTON, WINSTON LIGHTS, and CAMEL LIGHTS from Panos ARGYROPOULOS. Argyropoulos passed to Akin the attached pictures and claimed that he could supply the "new design with round corner." He further claimed that as of January 2010, he would be able to supply WINSTON SUPER SLIMs per the attached picture.

According to Argyropoulos, he had a total of 150 cases of CAMEL that he purchased from JTI and was offering at US\$390 per case. He was offering the CAMEL LIGHTS at US\$400 per case CNF and the mixture would be 70-80 percent Lights versus 20-30 percent full flavor.

Argyropoulos also claimed to be regularly buying containers of WINSTON from JTI.

Intelligence Report
URN: HCRR00003420

Subject: Akin OZBEKOGLU of Ozbekoglu Ticaret Ofisi Offers Nikola DRAGANIC 730 Cases of MONTE CARLO

On 12 February 2010, Akin OZBEKOGLU of Ozbekoglu Ticaret Ofisi offered Nikola (aka Nick) DRAGANIC of Maglajska 32, 11000 Belgrade, Serbia; Tel: +381 63222169 thegold100@yahoo.com, 730 cases of MONTE CARLO at Euro 160 per case.

Nikola told Ozbekoglu on 16 February 2010 that he has a new customer who wants to see a sample. He asked Ozbekoglu to send a pack to the following address:

Ivan LNU

Meta Tobak DOO

Pristaniska Str. 8, 2000 Maribor, Slovenia

Tel: +381 645810000

From: Francis, David

Sent: Thursday, February 25, 2010 12:28 PM

To: Van Adrichem, Willem

Subject: FW: DFS Shipstore Dardnelles

Dear Willem,

As requested, information regarding DFS Shipstore Dardanelles attached with comments below.

Regards,
David.

From: Warburton, Simon

Sent: Thursday, February 25, 2010 11:15 AM

To: Francis, David

Subject: FW: DFS Shipstore Dardnelles

Dear David,

Please find information regarding DFS Ship Store Dardnelles as requested.

Kind Regards
Simon

From: Tezel, Oguz

Sent: Thursday, February 25, 2010 10:00 AM

To: Warburton, Simon

Subject: RE: DFS Shipstore Dardnelles

Dear Simon,

DFS Ship store in Dardanelles is operational for a very long time. Over 19 years.

Due to new Custom Legislation, each Duty Free area has to run by one Duty Free Operator (sole operator). Therefore, ex DUZ-KOC and FALCON shipchandling companies are merged and established a new shipchandling company called DFS SHIPSTORE. This merger took place May 22, 2009.

Last year (2009) we have shipped them 19.20 mm.

In 2010 there is no shipment so far.

Owner of the company called Mr. Recep DUZGIT.

If you need more information, please let me know.

Kind regards,
Oguz

From: Howard, Edward
Sent: Tuesday, February 23, 2010 7:27 PM
To: Van Adrichem, Willem
Cc: Warburton, Simon
Subject: FW: Distributors MENENAT region

Dear Willem

Weybridge hub has four distributors - IBCS, Yagmur, Weitnauer and Cobweb

Contact details are as below

The attachment shows the sales month by month in 2009, the brands and the end market supplied

Please let me know if you require any more information

Kind regards

IBCS contact details

Main contact

Petros Vardas

00 357 258 37141

Address for shipments to Lebanon, Syria, Jordan, Cyprus, Libya
Omiros and Arouzos Tower

7th Floor
Olympion Str 3035
PO Box 3049
Limassol
Cyprus

Address for Gulf and E African shipments
IBCS Trading & Distribution
IBCS SHARJAH
Corniche Plaza 1 Bldg.
P.O. Box 23489
Al-Majaz, Corniche Road
Sharjah
Utd.Arab Emir.

Yagmur - Turkey

OWNER : Mr EKIN ADADEMIR
E mail : ekin@ekinadademir.com
GSM : + 90 542 85 111 96
SWICH BOARD : + 90 392 22 54 950

Weitnauer - West Africa
Carlos Amado Blanco
Malzgasse 29
CH - 4001 Basel
Phone 0041 61 269 1440
Cobweb
Karim Mahjoub
Gyrstrasse 1
6300 Zug
00 41 216 70 838 000
Edward Howard
00 44 1932 37 2552
00 44 7966 76 43 81

From: Warburton, Simon
Sent: 22 February 2010 08:00
To: Howard, Edward
Subject: FW: Distributors MENENAT region

Dear Edward,

Could you please prepare the requested information

Thanks
Simon

From: Francis, David
Sent: Monday, February 22, 2010 7:51 AM
To: Warburton, Simon
Cc: Van Adrichem, Willem
Subject: FW: Distributors MENENAT region

Dear Simon,

Would you please send Willem the information requested.

Regards,

David.

----- Original Message -----

From: Francis, David
To: Payne, Steve
Sent: Thu Feb 25 09:13:07 2010
Subject: FW: Duty Free Distributors_SWE-CEN

Dear Steve,

Information as requested attached.

Regards,

David.

-----Original Message-----

From: Tronchet, Nicolas
Sent: Thursday, February 25, 2010 9:26 AM
To: Francis, David
Cc: Moskovchenko, Eugenia

Subject: Duty Free Distributors_SWE-CEN

Dear David,

See attached requested file with DF Distributors of SWE and CEN regions.

Note the split per Brands is at Ship To level.

Let me know should you need anything else.

Kind regards

Nico

David A. Reynolds

Vice President

Brand Integrity Global Operations

JT International (Asia Pacific) Limited

Direct: +852 2585 9388

Mobile: +852 9189 2093

Fax: +852 2506 4556

Suite 4205-11, Tower One, Times Square

1 Matheson Street

Causeway Bay, Hong Kong

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