

FIP INVESTIGATIONS REPORT – ÖZBEKOĞLU TÝCARET OFÝSÝ – CIGARETTE TRADING COUNTERPARTIES

The firm Özbekođlu Týcaret Ofýsý (Özbekođlu Ticaret Ofici) is at the center of the trade in gray-market cigarettes throughout the eastern Mediterranean. Most of the cigarettes appear to be bound for buyers in northern Iraq, although Özbekođlu also has been noted in recent months shipping consignments to buyers in Europe, the United Arab Emirates, the United States, and South America. The cigarettes, including large amounts bearing the trademarks of major international companies, including PMI, BAT, and JTI, mainly come from distributors and traders in Greece and Cyprus, although other, principally private-label, brands originate from firms such as European Tobacco and Baltic Tobacco in Turkey and Russia, respectively. Imperial Tobacco cigarettes, including Davidoff, also are traded or shipped by Özbekođlu, but in smaller amounts, and appear to mainly originate from duty-free traders in Greece and Turkey, and at least one or more other suppliers that are yet to be identified.

- Most, if not all, of the cigarettes handled by Özbekođlu, move via the firm's warehouse at Number 15, 3 Sokak in the Serbest Bölge area of Mersin. At any one time, there appears to be between 7,000 and 8,000 master cases of various brands at the warehouse.
- The cigarettes enter and depart the Port of Mersin via Berths 4-13, in the general harbor, and Berths 22-24, servicing the free-trade zone, and after processing, re-packaging, and re-documenting at the Özbekođlu warehouse, enter Iraq via the Habur Bridge Border Crossing.

Reporting from source ASD, who has excellent access to Özbekođlu company officers Akin and Hakan Özbekođlu, who are principally responsible for all the firm's trading in cigarettes, and a review of official documents and statistics, have identified the following counterparties as the firm's principal suppliers and buyers of cigarettes, including Imperial Tobacco brands (see Appendix One for a review of Özbekođlu company addresses, associated companies, and company history).

Neither ASD nor our other sources can currently confirm whether or not supplies of Davidoff or other Imperial Tobacco brands are coming from, or being delivered to, Muhannad Jabi (Muhammad Jabi), Dhana Trading, Gebran Thome (Gibran Thome), or Ghafour Koshnaw. The last contact our sources had with members of this group was in mid 2006, when Muhannad Jabi, Jan Shamoun, and Moustapha Naja were in talks with Mark Hale (mark@gcca.co.ae, Tel: +971 67423616 and +971 67426886 (fax)) of Gulf Conversion L.L.C. to arrange the production of Caravan 100mm Box, a possible Craven A knock-off, and Golden 100 soft, to be made with a Viceroy blend, which were bound for Syria.

ÖZBEKOĞLU'S SUPPLIERS, BUYERS, AND SHIPPERS

J.M. Dolphin Transit Stores S.A.



Address: Spetson & Ippolytou 1 / 185 38, Piraeus, Greece and Marina Zeas A2-A3-A4, Piraeus, Greece

Tel: 210 4538063 – 210 4537947

Fax: 210 4520050

Email: jmdolphin@jmdolphin.gr

Web site <http://www.jmdolphin.gr/>

VAT No: 094080370

Bank Account 250449-001 at Royal Bank of Scotland at Akti Miaouli 61, Piraeus Greece.

Points of Contact: Nikos Mavrikos, Owner, and Tassos LNU, Sales Manager

Note: J.M. Dolphin, which is run by the Mavrikos family, appears to be Özbekoğlu 's principal supplier of international-brand cigarettes, typically shipping between 800 and 1,200 master cases of cigarettes to the firm's Mersin warehouse every other month. The cigarettes are mainly JTI brands, including Monte Carlo, Winston, and Camel, but also often including PMI Marlboro and Karelia Tobacco brands. J.M. Dolphin has been noted offering at least one consignment of Davidoff to Özbekoğlu in the past but it has not been confirmed if Özbekoğlu purchased the cigarettes.

J.M. Dolphin reportedly obtains most of its international brand cigarettes from the Greek firm **Athanssiou S.A.** (see <http://www.athanassiou.gr/>), which appears to be an official distributor in the region for some of the major tobacco companies. The firm likely has other suppliers, however, including for Imperial Tobacco cigarettes, which are yet to be identified.

DFS Shipstore Dardanelles (DFS Gumruksuz Satis Magaza Isletmeciligi Ticaret)



Address: Cumhuriyet Mahallesi, Sahil yolu Caddesi, No: 33 Kat – 1, Daire - 1 17110 Kepez Çannakkale, Turkey

Tel: +90 286 263 63 74-75-76 / +90 286 263 64 54 – 55

Fax: +90 286 263 66 00 / +90 286 263 66 33

Telex: 58121 dzkc tr / 58142 falc tr

Email: sales@dfsshipstore.com, metin.cahit@dfsshipstore.com, nursel.ozler@duzgit.com, hakan.kayali@dfsshipstore.com

Web site: www.dfsshipstore.com

Points of Contact: Metin Cahit Ozar, Hakan Kayali, and Recep Duzgit

Note: DFS Shipstore, which was formed by the merger of Falcon Tax Free Store Management and Trade, Inc and Duz-Koc in May 2009, is Özbekoğlu 's second principal supplier of

international brand cigarettes. It has been noted shipping to Özbekoğlu mixed-load consignments – often with no more than 200 cases of each brand – of BAT and JTI cigarettes, mainly Winston, More, Rothmans, Dunhill, Pall Mall, Viceroy, and B&H. It also ships larger consignments – often 300-400 cases each – of Karelia to Özbekoğlu. It is known that DFS Shipstore has access to Davidoff, but no shipments to Özbekoğlu have been noted in the past six months. DFS Shipstore appears to be a duty-free retailer and likely obtains supplies of its cigarettes directly from the international firms concerned.

George Vassilis Tsoukatos

(aka Georgios Tsoukatos, Vassilios Rossolymos, Vasileios Rosolymos)

Antonios Tsoukatos

George Vas. Tsoukatos, Ltd

Tsoukatos Georgios, Ltd

Tsoukatos Bros, Ltd

Tsoukatos, Ltd



Address: 73 Akti Maiouli 185 37, Piraeus, Greece (George Vas. Tsoukatos, Tsoukatos Georgios, and Tsoukatos Bros); 5 Sfaktirias Street 185 34, Piraeus, Greece (Tsoukatos); Pipinou 29, Athens, Attiki 112 51, Greece (Rosolymos)

Tel: +30 2104186641, +30 2104186642, +30 2104124660, +30 2104125061 (fax), +30 2104283198 (fax)

Email: yrossolymos@hotmail.com and atsoukatos@gmail.com

Website: <http://gtsoukatos.com/> (is now a news blog)

Bank Account 23851171 at the Bank of Cyprus, Filonos Branch 091, Piraeus, Greece

Note: Tsoukatos, who claims to be a licensed duty-free retailer and ship-chandler, sold Davidoff to Bassam Zeini (see below) in mid 2009 for delivery to the Özbekoğlu warehouse in Mersin (see Appendix Two for a purchase request issued by Zeini's firm Mediterranean Star LLC).

Tsoukatos reportedly usually sells diverted international brands to buyers in Macedonia, but as recently as late 2009 was in contact with at least one customer in the United Kingdom, and still regularly delivers truck consignments of cigarettes and possible other goods to a customer in Dublin, Ireland. Although the source did not know the origin of the Davidoff sold to Zeini, or if Tsoukatos currently trades in the brand or other Imperial cigarettes, he noted that Tsoukatos is closely associated with the Mavrikos family behind J.M. Dolphin and likely receives diverted cigarettes from the same source(s) supplying Mavrikos.

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Tsoukatos also stays in close touch with a variety of contacts at duty free sales firms in Greece, including Hellenic Duty Free Sales Shops, S.A.; Amvyx, S.A., and Gaea, S.A.

Tsoukatos, using different names and companies currently has, or recently had, advertisements on the B2B sites <http://europe.bloombiz.com/>, <http://www.tradeprince.com/>, <http://www.company400.com/>, <http://www.wdexporters.com/>, and <http://alibaba.com> advertising the sale of various products, including international brand cigarettes.

On <http://europe.bloombiz.com/> he was most recently using the “sell words” “marlboro red, marlboro light, west, memphis, rocket 40.”

The firm’s site on <http://europe.bloombiz.com/> included the following description:

“Welcome to George Vas. Tsoukatos website.

The company is licensed to operate in the Greek Duty Free Market. It's offices are located at the port of Piraeus where it's bonded warehouse is also. We supply all known brands of cigarettes and drinks to whoever is entitled to (merchant & passenger ships, airports, embassies etc) and we do quite a brisk business at exporting in the middle and Far East markets.”

At the 73 Akti Miaouli address are co-located several shipping, trading, and travel service firms, including Doganis J.A. & Company Shipping Agency, Ltd; Donomis Marine; KD Services, Ltd; Doganis Tours; Doganis Tours Travel and Tourism; and, Hardy Marine Service.

Panos Argyropoulos (aka Gianoulis Panagiotis Argyropoulos)



DOB 20 August 1980

Greek Passport AB9528855

Greek ID S354962

Manager, Masri Shipping & Trading, Ltd

Shareholder, Benmore Holdings, Ltd

Unitrade Holdings, Ltd

Products Distribution, Ltd

Address: Vyzaniiou Street, No. 6, Athina Gardens, Building 2, Ayius Tychonas, Limasso, Cyprus, 4521 (Benmore); John Kennedy Street 8, Iris Court, 7th floor, Office 740B, Limassol, Cyprus (Benmore – service company address); Suite 307, St Andrew Street 339 E Andrea Chamber Building, Limassol, Cyprus (Masri); P.O. Box 58016, P.C. 3730, Limassol, Cyprus (Products Distribution); 339 Ayiou Andreou Street Andreas Chambers Building 3rd Floor suite 307 PO Box 54085 Limassol 3720 Cyprus; and 10 Kolokotroni Street, Tolo, Nomos Argolidas 21056, Greece (family home).

Tel: +30 2752053085, +30 6932273281, +30 2752059952, +357 25431392

Email: panos.argyropoulos@gmail.com, panos_argyropoulos@hotmail.com, and unitrade.holdings@gmail.com

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Web Site:

http://web.archive.org/web/20040616143710/www.masrishipping.org/main_en.html

Bank Account 590301 in the name of Benmore Holdings at the Bank of Beirut S.A.L., Beirut, Lebanon.

Note: Argyropoulos is a supplier of sizable amounts of international brands bearing the BAT, JTI, and PMI trademarks to Özbekoğlu, which he appears to mainly buy in South America and also from various suppliers in Europe using Loendersloot Internationale Expeditie B.V. in Roosendaal, The Netherlands, to handle and store shipments. Argyropoulos, in turn, seeks to buy Davidoff from Özbekoğlu. As recently as March and then again in May 2010, Akin Özbekoğlu offered an unknown amount of “new Davidoff” to Argyropoulos for delivery through the Unitrade Holdings. In October 2009, Argyropoulos agreed to pay Özbekoğlu US\$415 per case for an unknown amount of Davidoff. The Masri Shipping & Trading website, meanwhile, currently lists Davidoff, Gauloise, and other Imperial Tobacco brands for sale.

Argyopoulos works closely with Elias and Katholiki (aka “Kiki”) Masri, who own Masri Shipping & Trading and jointly own, with Argyropoulos holding 49 percent of the shares, Benmore Holdings. Argyopoulos uses Products Distribution to offer cigarettes for sale on the Internet, while both Kiki Masri and Argyropoulos have used the firm Unitrade Holdings to trade cigarettes.

European Tobacco Sigarave Tutunculuk Sanayi Ticaret A.S.



Address: Arbel Tesisleri, 37-4 Yeni Mahalle, Cumhuriyet Bulvari, Turkey

Tel: +90 3242411130, +90 3242411133, +90 3244512855 (fax)

Points of Contact: Adil Kurt, adil@eutobacco.net; Ersin Civanoglu,

ersin.civanoglu@eutobacco.net; İpek Çiftcioglu, ipek.ciftcioglu@eutobacco.net; and Hasan

Gokhan, hasangokhan@eutobacco.net

Bank account at Denizbank A.S., Istanbul

Note: European Tobacco appears to regularly supply “S&K” and/or “S.K.” cigarettes, as well as the brand Vigor, to Özbekoğlu. In April 2010, Adil Kurt, representing European Tobacco, was finalizing a sale of 2,000 “packages” of “S&K” cigarettes to Özbekoğlu. In March 2010, European Tobacco issued an invoice to Özbekoğlu calling for a payment of US\$25,000 for a purchase of “S&K” or “S.K.” cigarettes. (NB: None of the sources have seen a sample of the “S&K” or “S.K.” so we cannot confirm if this is a reference to counterfeit or diverted Super Kings or a possible knock-off of this brand).

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Nickola Draganic (aka Nick, Ivan)

Address: Maglajska 32, 11000 Belgrade, Serbia and Pristaniska Str. 8, 2000 Maribor, Slovenia

Tel: +381 63222169, +381 645810000

Email: thegold100@yahoo.com

Bank Account 206-403426.61C at UBS AG at Paradeplatz 6 8098 Zurich, Switzerland

Note: Draganic is a regular buyer of Imperial and other international brand cigarettes supplied by Özbekoğlu. Although he mainly buys containers packed with mixed loads, in February 2010, he has in talks with Özbekoğlu to buy a single consignment of Davidoff and West alone. During the same month, Nikola took delivery of a mixed-load container from Özbekoğlu that included an unknown amount of Davidoff, Gauloises, Gitanes, and West. He also received a second container at the same time from Özbekoğlu that carried unknown brands. Most of the shipments purchased by Draganic go from Mersin to the Port of Bar in Montenegro or Constanta in Romania and then into Serbia, the Ukraine, or elsewhere in the region.

Bassam Zeini (aka "Hayssam")



MEDITERRANEAN STAR LLC

Mediterranean Star LLC

Address: Port Said Road, Al Faradan Building, Human Appeal International, Office 204, Deira, Dubai; PO Box 117411, Omar bin al Khatab Road, Dubai;

Tel: +971 42669371, +971 42639333, +971 42669374; +971 506505744 (Mobile); +961 3677459 (Lebanese Mobile); +971 42649444 (Fax), +971 508900574 (Fax)

Bank Accounts 387486 in the name of Mediterranean Star at Habib Bank A.G., Zurich and 1000666493 in the name of Mediterranean Star at the Commercial Bank of Dubai, Main Branch.

Email: bassamze@emirates.net.ae, bassam@cstar.ae, bassamze@eim.ae,

bassamze@hotmail.com, c_bassam@hotmail.com, and navigation2008@hotmail.com

Note: Since at least 2005, Bassam Zeini has purchased consignments of Imperial Tobacco and other international brand cigarettes from Özbekoğlu. He has not been noted dealing with Özbekoğlu in 2010. His most recent exchange with the company was in May 2009, when he was in talks to buy 340 cases of Davidoff Classic, Lights, and Magnum, although he was scheduled to receive a delivery of Davidoff and other brands via Özbekoğlu supplied by George Vassilis Tsoukatos in mid-to-late 2009 (see above). In the past, Zeini was dealing in Davidoff, Gauloise Blondes, Lambert & Butler, Super Kings, Regal, and Gitanes.

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Oriental G.T. Inc



Address: P.O. Box 17432, Jebel Ali Free Zone, Dubai, UAE

Tel: +971 48837334; +971 48837335 (Fax)

Email: tony@orientalme.com; mail@orientalme.com

Web: www.orientalme.com

Point of Contact: Tony D'Souza

Note: Oriental Group has been in regular contact with Özbekoğlu, as well as Shyam Lakhyani, and Bassam Zeini, but the source is unable to confirm the nature of these dealings.

OOO Baltyskaya Tabachnaya Fabrika (Baltic Tobacco)



Address: Pravaya Nabereshnaya 10, 236006 Kaliningrad, Russia

Email: btf_log@peterstar.ru

Bank Account 4070284090000022386 at Investbank AKB OAO

Note: In February 2010, Özbekoğlu paid US\$230.625,00 to Baltic Tobacco for a shipment of cigarettes from Kaliningrad. In early March 2010, the logistics department of Baltic Tobacco was attempting to arrange the delivery of six 40-foot HC containers of cigarettes from Kaliningrad to the Özbekoğlu warehouse in Mersin possibly via Hamburg in Germany, for an unknown buyer. *(NB: The brands in the shipment were not identified but the source believed they likely are Jin Ling.)*

Nicola El Issa

International Supplier Group SAL,

Address: Hamad Sayegh Building, 5th Floor, Ballouneh, Kesserwan, Lebanon

Tel: +961 9236464, +961 3754556;

Email: nic@cyberia.net.lb

Note: In March 2010, El Issa offered to sell to Akin Özbekoğlu two containers – one 20-foot with 448 cases and one 40-foot with 1,044 cases – of Manchester cigarettes with English-language health warnings and marked “Made in United Kingdom.”

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Shyam Lakhyani

American Import Corporation SA

Algene Trading

Address: Colon Free Zone, Panama (American Import), 1165 Chris Lake Drive, Lawrenceville, GA, 30045, USA (Algene)

Tel: +507 66138387, +507 4419708

Email: americaimp@cwpanama.net

Note: Several containers of counterfeit Sovereign Classic cigarettes were seized in Italy and Malta in late 2008 that had been shipped from Özbekoğlu bound for Lakhyani. Another three containers of cigarettes from Özbekoğlu were reportedly intercepted, and possibly seized, in Iquique, Chile. Some of the cigarettes sold to Lakhyani by Özbekoğlu reportedly came from Jalat Khan, a duty-free distributor in Afghanistan, who, in turn, buys cigarettes from the firms **IBCS Trading & Distribution, Ltd** of Omiiros and Arouzos Tower, 7th Floor, Olympion Str 3035, PO Box 3049, Limassol, Cyprus; Tel: +357 25837141; Point of Contact: Petros Vardas and **IBCS Sharjah, Ltd** of Corniche Plaza 1 Bldg, P.O. Box 23489, Al-Majaz, Corniche Road, Sharjah,

Newton Trading S.A.

Address: Zona Franca Puerto Aguirre, Quijarro, Bolivia

Point of Contact: Otavio Garcia in Chile using Tel: +56 589693096

Note: Özbekoğlu shipped 1,000 cases of unspecified cigarettes in a 40-foot HC container to Newton Trading in March 2010. The consignment went from Mersin to Bolivia via Arica Port in Chile.

Yagmur Import-Export, Ltd

Famagusta

Yagmur - Turkey

Tel: +90 5428511196, +90 3922254950

Email: ekin@ekinadademir.com

Point of Contact: Ekin Adademir

Note: Yagmur, which is a duty-free distributor for one or more international tobacco firms, has been regularly shipping consignments of international brands to northern Iraq and has used Özbekoğlu to handle these shipments in the past. On at least one occasion about 18 months ago, Özbekoğlu offered to sell to a Yagmur representative a shipment of international brands obtained from J. M. Dolphin. The source is unable to confirm the brands being sold or shipped by Yagmur.

Koval Duty Free Famagusta Free Port, Ltd

Address: 6 Liman Yolu (Port Road), Old City (Famagusta) Gazmagusa, North Cyprus, K.K.T.C.

Note: Koval appears to be the largest recipient of shipments of Jin Ling and Karelia shipped from or via Özbekoğlu. Koval also has been noted receiving shipments this year of cigarettes, including Assos and Cooper, and Golden Virginia rolling tobacco, from the Philippines via Port Said on behalf of Bassam Zeini and possibly other clients.

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Hiba General Trading Company

Address: Dohuk, Iraq

Note: Hiba General Trading is one of Özbekoğlu's main customers in Iraq. It typically receives several truck-loads of cigarettes each month, all delivered via the Habur Border Crossing. Most of the shipments are sent via the firm Teknotas Ulus. Nal Ve Tic, Ltd Sti located at Cami Serif M 5204 Istikal Cad. No 18/X. Other buyers of Özbekoğlu cigarettes in Iraq include SVE and Dindar in Dohuk. Shipments to these companies go via the Turkish companies Acikgoz San. Tic. Lim. Sir. of Camiserif Istiklal C33 Sokok D. No 12 K. No 10 Icel, Mersin and Acikgoz San. Tic. Lim. Sir. of Camiserif Istiklal C33 Sokok D. No 12 K. No 10 Icel, Mersin.

Havkar General Trading & Construction Company

Irbil, Iraq

Note: In April 2010, Özbekoğlu purchased 2,200 "packages" of the brands Vigor Premium and Vigor Ultimate from European Tobacco for re-sale to Havkar General Trading & Construction.

Mr. Saad

Address: unknown in Dubai

Email: sf_saied@eim.ae

Note: Saad has been buying or taking delivery of diverted international brand cigarettes delivered via Özbekoğlu in Mersin. The last consignment taken by Saad was Marlboro diverted from Latin America and Southeast Asia. The source cannot confirm if he has recently purchased Imperial brand cigarettes.

Botros and Levante Shipping and Trading Company

Address: Gumruk Meydani, Kayahan Kat 2/11-13, Mersin

Tel: +90 3242374100 and +90 3242375772 (fax)

Email: bbalamir@cma-cgm.com

Point of Contact: Bulent Balamir

Bosmar Shipping, Ltd

Email: bosmar@turkishcyprusshipping.com

Note: Botros & Levante and Bosmar Shipping are the principal freight forwarders and shipping agents employed by Özbekoğlu. These two firms handle most, if not all, the sea consignments of cigarettes arriving and departing Özbekoğlu's warehouse in Mersin.

EXPORT SHIPMENTS FROM ÖZBEKOĞLU VIA MERSIN FREE PORT

A review of Customs records confirms the following exports of cigarettes from Özbekoğlu via the Mersin Free Port to date in 2010. Details on shipments via the general harbor in Mersin and through the Habur Border Crossing into Iraq are not covered and are kept in separate Customs databases. *We estimate that shipments from Özbekoğlu via the general harbor and Habur Bridge equal or exceed those shipped through the Free Zone Port.*

<u>Date</u>	<u>Master Cases of Cigarettes</u>
02 January 2010	470
19 January 2010	2,000
7 April 2010	2,000
9 April 2010	200
13 April 2010	4,758
30 April 2010	2,200
5 May 2010	240
9 June 2010	1,000
10 June 2010	1,000
28 June 2010	1,161
29 July 2010	1,250
23 August 2010	550
26 August 2010	950
22 September 2010	880

IDENTIFYING ÖZBEKOĞLU'S DAVIDOFF SUPPLIERS AND BUYERS – PROPOSED NEXT STEPS

Although the information obtained to date only provides a fragmentary “snap-shot” into the dealings of Özbekoğlu Ticaret Ofici, and in particular its handling of consignments of Davidoff and possibly other diverted Imperial Tobacco brands, it does suggest that diversions have recently occurred and that Imperial brands are available on the market, albeit in smaller numbers than those of other major tobacco firms. The Greek traders George Vassilis Tsoukatos and J.M Dolphin Transit Stores, and the Turkish duty-free distributor DFS Shipstore seem to be the principal sources of Imperial cigarettes, although we cannot yet rule out that other suppliers are now active. In turn, one or more of the traders in northern Iraq, as well as Panos Argyopoulos, Nikola Draganic, and Bassam Zeini seem to be the main buyers, although as middlemen.



Movement of International Brand Cigarettes to/from Özbekoğlu

In order to build on the information developed to date, and to further confirm or deny the presence of sizable diversions of Imperial cigarettes and, if necessary, determine their provenance, we recommend that the following steps be considered:

- **Survey Özbekoğlu Shipments.** Monitor shipments moving through the Özbekoğlu warehouse in Mersin for six to eight months, including arrivals and departures at the Port of Mersin – both the general harbor and Free Zone Port – and over the Habur Bridge Border Crossing into northern Iraq. Customs documents and reporting from ASD, and one or more additional sources in the warehouse, can be employed. If any

shipments carrying Imperial brands move through the warehouse, we would endeavor to identify the suppliers and buyers and obtain shipping, sales, of payment documents and/or codes and samples to confirm the provenance of the cigarettes.

- **Approach Buyers – Suppliers Offering Imperial Brands.** In parallel, the fact that George Tsoukatos, DFS Shipstore, and Panos Argyopoulos openly advertise the availability for sale of Imperial brands either on their websites or B2B sales sites, one or more approaches to them may allow for the collection of samples and the elicitation of details to again confirm if supplies are available and, if so, determine their provenance. Argyopoulos has been in contact in the past with one of our investigators and remains on good terms with this person, which should facilitate a follow on approach.
- **Approach and Debrief Zeini Employee.** Bassam Zeini is a well-known trader in diverted cigarettes and has been targeted by investigators on several occasions in the past. Nonetheless, he continues to trade in Imperial and other international brands, while an opportunity now exists to make an approach to one of his current employees. A Philippine national who purportedly has worked for Zeini's firm Mediterranean Star since December 2009 as a graphic designer is currently seeking a job and has posted her CV on one or more recruitment web sites (http://www.virtualassistantjobs.com/resume_view.php?id_code=2272&pagenum=10?search_term=&search_term=&cat=12&category_01=Graphic%20Design%20&%20Illustration&ksdjh=5). An approach to her, possibly using the cover as an executive recruiter, should allow for at least a debriefing in order to assess of her access to Zeini, and may present an opportunity to recruit her – or one or more other employee's she may recommend – as a source on his smuggling activities.
- **Investigate Özbekoğlu Suppliers to Identify Sources of Imperial Brands.** Further local investigations into George Vassilis Tsoukatos, J.M Dolphin, and DFS Shipstore, moreover, can be employed in order to fully identify their holdings – including any warehouses – and to determine the full identities of their counterparties, notably their suppliers. While Athanassiou appears to be the source of at least some of the diverted international brand cigarettes being re-sold by J.M Dolphin and possible Tsoukatos, the source of the remaining brands, including the bulk of the Imperial cigarettes remains unknown.
- **Identify Draganic and Determine Role in Distribution of Imperial Brands.** Conduct local investigations into Nikola Draganic in order to fully identify him and to find his holdings – including any warehouses – and his suppliers and buyers may be merited given his evident interest in buying Imperial brands. After Argyopoulos, Draganic appears to be the principal buyer of diverted Imperial brands in the EU. It is not clear, however, whether he is a middleman, simply working for other buyers, or is distributing the cigarettes himself.

- **Track Koval Duty Free Shipments.** Develop a capability in Famagusta to find and track shipments of cigarettes handled by Koval to determine brands, provenance, and destinations of key shipments. Koval appears to be one of the principal recipients of shipments of cigarettes departing Özbekoğlu and while it has not been noted taking delivery of Davidoff or other Imperial brands from the firm since the beginning of the year, it has handled consignments of apparently counterfeit Golden Virginia shipped from the Philippines.

APPENDIX ONE
ÖZBEKOĞLU TİCARET OFİCİ – COMPANY BACKGROUND AND DETAILS

Özbekoğlu Ticaret Ofici (Turkish: Özbekođlu Týcaret Ofýsý or Özbekođlu İthalat İhracat İnşaat Taahhüt ve Mühendislik Ltd.Şti)

Trade Reg. No 144241

Capital 75,000.00 YTL

Share Ownership: Mustafa Sen with 95 percent and Isil Sen with 5 percent

Company Manager: Mustafa Sen

Company Principals:

Mustafa Sen

Isil Sen

Akin Özbekođlu (aka Akin Bey Dik)

Hakan Özbekođlu

Mehmet Ferhat Özbekođlu

Veysel Yilmaz

Ms. Gulay Demir

Sami Kocaoglu

Tel: +90 5 324531615, +90 32423775, +90 3126465270, +90 3123853540-41, +90 3124720404, +90 3124720930 (fax), +90 3123850855 (fax), +90 3126465176 (fax), and +90 3242372043 (fax)

Email: h.özbekođlu@superonline.com, özbekođlu@superonline.com, and özbekođlu@özbekođlu.com

Website: <http://www.ozbekoglu.com> (no mention of cigarettes)

Addresses:

- No. 15, 3 Sokak, Mersin Serbest Bölge, Mersin – warehouse used by Özbekođlu to store and process cigarette consignments
- Cetin Emec Bulvarı, 2. Cadde, No. 6/1-7, Dikmen, Ankara - No cigarette products observed. This location reportedly is an office for Özbekođlu İthalat İhracat, İnşaat, Taahhüt ve Mühendislik Limited Sirketi (Özbekođlu İmport, Export, Contractor and Engineering Limited Company), which was previously known at Özbekođlu Ticaret Ofici Ltd. Sti. (Özbekođlu Trade Office Limited Company). Prior to 1998, the company was located ta Sircali Mesit Mah, İstanbul Cad. Meramli İshani K:2 No. 40, Konya.
- Atisan San. Sitesi, 17 Sok, No. 17, Macunkoy, İstanbul - No cigarette products observed.
- Hurriyet Mah, Hukmu Peker Cad. No. 12/A, Temelli, Ankara - No cigarette products observed.
- **Four Stars Apparel Isikli Real Estate Getas Construction, Ltd** (Four Stars Konfeksiyon ve Aksesuar İmalat ve İhracat Limited Sirketi) located at Adnan Menderes Bul., Marina Sitesi, D Blok, No. 5/9, Mersin is owned by Mehmet, Hakan, and Akin Özbekođlu and Mustafa Sen and Isil Sen but is in a residential complex and likely not associated with cigarette trading.
- **Isikli Real Estate Mining Industry and Trade Company, Ltd** (Isikli Emlak Madencilik Sanayi ve Ticaret Limited Sirketi) located at Homurlukoyu yolu uzeri, 1 km, Mersin is

owned by Mehmet, Hakan, and Akin Özbekoğlu and Mustafa Sen. It is a warehouse that Özbekoğlu began using in the middle of 2008. The warehouse is approximately 1500-2000 square meters of covered area however it is currently empty.

- **Getas Construction Industry Contractor and Trade Company, Ltd** (Getas Insaat Sanayii Taahhut ve Ticaret Limited Sirketi) company is located at Mahmudiye Mh., 4809 Sokak, Mer-in Is Merkezi, B Blok, Kat:3/30, No. 33070, Mersin is part owned by Mustafa Sen. The nature of its business is currently unknown.

Özbekoğlu Ticaret Ofisi Limited Sirketi (Özbekoğlu Trade Office Limited) was initially established in the Konya province of Turkey in 1974. In 1988, the company established an office in the Mersin Free Trade Zone. During the late 1990's the company moved its headquarters from Konya to Ankara and changed its name to Özbekoğlu Import, Export, Construction Contractor and Engineering Limited Company (Özbekoğlu Ithalat Ihracat Insaat Taahhut Muhendislik Limited Sirketi). The company in Ankara provides industrial equipment, whereas its office located at the Mersin Free Trade Zone deals with international trade of goods such as cigarettes, PVC profiles, cement, food, and automobile tires, etc.



Özbekoğlu Warehouse at No. 15, 3 Sokak, Mersin Serbest Bölge, Mersin



Özbekođlu Warehouse at No. 15, 3 Sokak, Mersin Serbest Bölge, Mersin



Özbekođlu (Isikli Real Estate Mining Industry and Trade) Warehouse at Homurlukoyu yolu uzeri, 1 km, Mersin

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APPENDIX TWO
ÖZBEKOĞLU TICARET OFICI – GEORGE VAS. TSOUKATOS SUPPLY OF CIGARETTES TO
MEDITERRANEAN STAR



MEDITERRANEAN STAR LLC

ORIGINAL

15.07.2009

Mr GEORGE VAS. TSOUKATOS LTD

CIGARETTES – DRINKS TRANSIT

AKTI MIAULI 73

TEL.210 41 86 641

TEL.210 41 86 642

FAX. 210 42 83 198

Please as you deliver us to the company :

OZBEKOGLU TICARET OFISI
3.SOKAK NO 15
EXPORT – IMPORT
FREE ZONE MERSIN – TURKEY

42	L/S	B.F.	different
86	L/S	G.R.	different
19	L/S	COPPER	different
367	L/S	KARELIA	different
30	L/S	DAVIDOFF GOLD	different
25	L/S	SILK CUT	different

TOTAL 569 L/S.

P.O.BOX 117411, Dubai, UAE - Tel: +971 4 266 93 71, Fax:
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