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**From:** Reynolds, David A  
**Sent:** Friday, March 26, 2010 10:08 AM  
**To:** Van Adrichem, Willem  
**Cc:** Robalo Da Silva, Vitor Manuel; Monteith, Ian; Carter, Andy; Chan, Ivy; Douglas, Craig; Man, Teresa  
**Subject:** RE: 400 MC Winston Ultra Lights/Iraq

Willem,

Did you obtain any further information on "UTI?" It seems a bit strange to have an Israeli company on the shipping documents when the load is heading via Iraq to presumably Iran. It also raises a bit of a concern since we had all those issues with James Richardson (via CSE to Lebanon, not to mention by their own admission two containers to Antwerp and 3 to 4 previous shipments) last year, who happen to be based in Haifa. The last I have on record on the Richardson case is Mark's email below.

I also note that Miel Trading has shown up before, with a WINCHESTER diversion from IBCS. If not done already, you should run checks on this firm to see who runs it and if they are linked to any of our clients. You can find the Miel references in Memex.

Thanks - Dave

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**From:** Mulvey, Mark  
**Sent:** Monday, June 22, 2009 9:31 AM  
**To:** Reynolds, David A; Van Adrichem, Willem  
**Cc:** Francis, David  
**Subject:** RE: Israel DF

*Dave/Willem – we met with DF on Friday. They are implementing a number of steps to preclude any additional shipments to CSE. If we can monitor this – ok; otherwise, there are no other requirements. If something again develops either from our side or DF, David Francis will contact Willem directly with cc to Dave R and me. Thanks, Mark*

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**From:** Aslihan SAK [mailto:aslihan.sak@esfor.com.tr]  
**Sent:** Monday, March 01, 2010 8:31 PM  
**To:** Van Adrichem, Willem; Robalo Da Silva, Vitor Manuel  
**Cc:** BI Operations; S4-0247  
**Subject:** FW: 400 MC Winston Ultra Lights/Iraq

Dear Williem,  
Please see answer of your questions

- **What is known from your side about the initial shipper Haifa dan UTI from Israel (do you have more details ?)**

Unfortunately the only information we have is the initial shipper company name which is "UTI" and its location (Israel – Haifa)

**Note:** The company name is not "Haifa dan UTI". It is just "UTI". I guess there had been a spelling mistake.

- **What do you know about this transport company ? They regularly do transports to Iraq ? etc.**

In 2009 Mr. Andy Carter from JTI requested us to identify all players in the Mersin Free Trade Zone that deal in cigarettes. In order to determine the players we contacted our sources, examined the Chamber of Commerce and Mersin Free Trade Zone records. At that time one of our source informed us that the company named Teknotas has companies in the Mersin Free Trade Zone and it ships cigarettes. Our source also added that the company smuggles cigarettes from time to time. For further details please see the attached report's page 40-43.

**Note:** I will send the password in another email.

Please let us know if you need further investigations on these companies.

Regards,

**Aslihan Sak**

**From:** Van Adrichem, Willem [mailto:Willem.VanAdrichem@jti.com]  
**Sent:** Saturday, February 27, 2010 1:53 PM  
**To:** Aslihan SAK; Cengiz GUMUSTUS; Vitor Manuel ROBALO DA SILVA  
**Cc:** S4-0247  
**Subject:** RE: 400 MC Winston Ultra Lights/Iraq

Dear all,

Just to keep you informed, both trucks were 'picked-up' in Iraq and after a while, they split - the truck with plate 33HV896 went to the central part of Iraq and the other truck Tag number 56JE213 (with the 400 master cases WINSTON Ultra Lights) crossed after several hours the border with Iran.

May I ask you if it possible to obtain more details like:

- What is known from your side about the initial shipper Haifa dan UTI from Israel (do you have more details ?)
- What do you know about this transport company ? They regularly do transports to Iraq ? etc.

Anyway, I like to say: **Many thanks to all of you for the professional cooperation.**

Best regards,  
Willem

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**From:** Aslihan SAK [mailto:aslihan.sak@esfor.com.tr]  
**Sent:** Friday, February 26, 2010 5:06 PM  
**To:** Van Adrichem, Willem; Cengiz GUMUSTUS; Robalo Da Silva, Vitor Manuel  
**Cc:** S4-0247; BI Operations  
**Subject:** RE: 400 MC Winston Ultra Lights/Iraq

Dear Williem,

Please see the information obtained below.

- The quantity observed 400 MC of Winston Ultra Lights & 40 MC Camel
- The initial shipper is Haifa dan UTI from Israel.
- The numbers put on the MCs are differentiate with the Boxes. Please see below;
  - WINSTON      MC 00012300703109      CARTONS      000123007031  
30
  - CAMEL      MC 8416500010784      CARTONS      84165000107  
74

When do you want us to communicate with you to discuss this issue?

Regards,

**Aslihan Sak**

**From:** Van Adrichem, Willem [mailto:Willem.VanAdrichem@jti.com]  
**Sent:** Friday, February 26, 2010 11:30 AM  
**To:** Aslihan SAK; Cengiz GUMUSTUS; Vitor Manuel ROBALO DA SILVA  
**Cc:** S4-0247; BI Operations  
**Subject:** RE: 400 MC Winston Ultra Lights/Iraq

Thanks Aslihan,

Pictures of the truck would be great.

Best regards,  
Willem

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**From:** Aslihan SAK [mailto:aslihan.sak@esfor.com.tr]  
**Sent:** Friday, February 26, 2010 10:10 AM

**To:** Van Adrichem, Willem; Cengiz GUMUSTUS; Robalo Da Silva, Vitor Manuel  
**Cc:** S4-0247; BI Operations  
**Subject:** RE: 400 MC Winston Ultra Lights/Iraq

Dear Williem,

Since our contact followed up the suspect shipment from the computer system unfortunately it is not possible to give physical information on the truck and the trailer. From our experience we believe that the shipment will arrive to the border around noon and wait there anywhere from 3-4 hrs to 2 days .

We asked one of our contacts who lives in that area to follow up on the truck and take pictures. We will update you on any developments.

Regards,

**Aslihan Sak**

**From:** Van Adrichem, Willem [mailto:Willem.VanAdrichem@jti.com]  
**Sent:** Friday, February 26, 2010 7:23 AM  
**To:** Cengiz GUMUSTUS; Vitor Manuel ROBALO DA SILVA  
**Cc:** S4-0247; BI Operations  
**Subject:** RE: 400 MC Winston Ultra Lights/Iraq  
**Importance:** High

Dear Cengiz,

Can you inform us about the 'colors' of the truck and trailer ? Also please keep us informed about the latest position and when/where it reaches the border with Iraq.

We need that information as the truck will be "picked-up" at the Iraqi border and it seems that regularly they change license plates when crossing the border.

Thanks,  
Willem

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**From:** Cengiz GUMUSTUS [mailto:cengiz.gumustus@esfor.com.tr]  
**Sent:** Thursday, February 25, 2010 11:38 PM  
**To:** Van Adrichem, Willem; Robalo Da Silva, Vitor Manuel  
**Cc:** Sandra GUMUSTUS; Alaettin CANGOZ; Suleyman OZTURK; Mehmet VAROL  
**Subject:** 400 MC Winston Ultra Lights/Iraq  
**Importance:** High

Willem/Vito

Please find the info on the suspect shipment as follows;

**Sender:** MIEL TRADING Ltd. FAMAGUSTA FREE PORT –NCTR  
**Receiver:** HIBA Co., GENEREL TRADING, Dohuk Office, DOHUK-IRAK  
**Transport Company:** Teknotas Uluslararası Nakliyat (TEKNOTAS INTERNATIONAL TRADE & TRANSPORT LTD. CO)  
<http://www.teknotas.com.tr/bos1-enu.asp.htm>  
Payload: 400 MC Winston Ultra Lights  
License Plate: Tractor/Trailer: 47 KV 550 / 47 NC 410  
Will be in Habur & cross tomorrow (Friday February 26<sup>th</sup>)

Regards

Cengiz

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**From:** Van Adrichem, Willem  
**Sent:** Thursday, July 16, 2009 2:41 PM  
**To:** Mulvey, Mark; Reynolds, David A  
**Subject:** RE: Israel DF

Dear Mark / Dave,

With reference to:

In the meantime, I have requested a reliable 'contact' to verify with the Commander of Unifil Lebanon, the Italian Maj. Gen. Graziano, if mentioned Osilan Trading Ltd in Cyprus supplies the Unifil forces in Lebanon with cigarettes and if yes if we can get details of previous shipments and if they expect a shipment of almost 10 million cigarettes.

I have been informed by telephone that Osilan Trading in Cyprus is a regular supplier of cigarettes for the Unifil Forces in Lebanon. This confirmation comes from the above mentioned Italian Commander of the Unifil Forces in Lebanon. At my next Beirut visit I can get more detailed information.

FYI  
Best regards,  
Willem

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**From:** Mulvey, Mark  
**Sent:** Monday, June 22, 2009 9:31 AM  
**To:** Reynolds, David A; Van Adrichem, Willem  
**Cc:** Francis, David  
**Subject:** RE: Israel DF

Dave/Williem – we met with DF on Friday. They are implementing a number of steps to preclude any additional shipments to CSE. If we can monitor this – ok; otherwise, there are no other

requirements. If something again develops either from our side or DF, David Francis will contact Willem directly with cc to Dave R and me. Thanks, Mark

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**From:** Reynolds, David A  
**Sent:** Monday, June 22, 2009 2:06 AM  
**To:** Van Adrichem, Willem; Mulvey, Mark  
**Subject:** RE: Israel DF

Willem,

David H gave me a run down on the meeting and it sounds like we're back on track with S, which is good news.

Did you get anything further from Costas? We need to know how much more time and effort we need to devote to this. DF should already have enough to follow up and deal with Richardson, but if they're claiming otherwise we need to know exactly what level of "evidence" is required in this instance.

Thanks - Dave

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**From:** Mulvey, Mark  
**Sent:** Friday, June 05, 2009 11:52 PM  
**To:** Van Adrichem, Willem  
**Cc:** Reynolds, David A  
**Subject:** RE: Israel DF

Dear Willem – please get back to Costas; I will speak with David. If Richardson refuses to provide details on previous shipments, we should drop them immediately (obviously taking into consideration the contractual arrangements). We have every right to know. Thanks, Mark

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**From:** Van Adrichem, Willem  
**Sent:** Saturday, June 06, 2009 12:14 AM  
**To:** Reynolds, David A; Mulvey, Mark  
**Subject:** RE: Israel DF

Dear both,

**IF true** that they provide Unifil, than of course it is not possible to ship directly from Israel to Lebanon.

I understood earlier today that Costas is willing to return to Israel trying to obtain possible copies of Bills of lading from the Customs authorities. If that would be necessary, it might be an option that I will travel to Israel too and together with Costas visit Richardson again. Costas and Richardson have apparently a long time working relation (20 years) and it might perhaps be easier for me to ask the questions to Richardson.

Any thoughts?  
Willem

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**From:** Reynolds, David A  
**Sent:** Friday, June 05, 2009 6:56 PM  
**To:** Van Adrichem, Willem; Mulvey, Mark  
**Subject:** Re: Israel DF

I thought Richardson had responsibility for ship store sales in Israeli ports. Is this true? Did (or can) we get clarification on what market Richardson is authorized to sell into? If ship store alone, UNIFIL is not their market. Also, did they explain why - if these are for UNIFIL - they all went to Loendersloot?

Since Richardson has admitted to the diversions, what additional information does DF need from us other than the follow up you are doing in Lebanon?

Since Richardson has admitted to diverting, and is refusing to be fully cooperative, it seems DF now needs to take action in accordance with company policy.

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**From:** Van Adrichem, Willem  
**To:** Mulvey, Mark; Reynolds, David A  
**Sent:** Fri Jun 05 23:24:39 2009  
**Subject:** Israel DF

Dear Both,

Earlier today I had a meeting with David Francis, GM of WWDF, who explained the following.

- After being briefed by Mark he had informed Martin Fister (DF) who had requested Costas Trivizas, DF trade marketing manager for Greece & Israel to visit their customer James Richardson Ltd in Israel for some inquiries.
- The other week Costas had a meeting with the owner of James Richardson Ltd and informed them that JTI is aware of a shipment of 2 containers to Antwerp which likely contain JTI products.
- They admitted shipping the 2 containers but said they were destined for the **Unifil force in Lebanon**. The company organizing the shipments to Lebanon is called **Osilan Trading Limited** in Limassol apparently, as explained to Costas, an affiliate of CSE Trading in Limassol.
- Costas was informed that the owner of CSE in Cyprus is an Israeli.
- James Richardson Ltd admitted that they had arranged 3 or 4 previous shipments over the last year; however explained that those shipments contained much less cigarettes. They refused however to provide Costas detailed information about the previous shipments.
- Costas informed them that they should not arrange any shipments anymore outside Israel - without JTI approval – which they agreed.

- It was said that likely from now on they will order less quantity of JTI product for their Duty Free sales in Israel. (Note: an indication that this scheme might be ongoing for a long time as there has been no increase of purchasing JTI products recently)
- Costas has already requested to his contact at the Israeli Customs headquarters for copies of the Bills of Lading from previous shipments. (When received – the copies will be forwarded to me.)

Without going in any detail, I have informed David Francis that BI is still investigating this matter and proposed that before making a final decision about how to deal with this customer it might be worth waiting the outcome of our investigation - hopefully within the next 2 or 3 weeks. David agreed to wait before taking any further steps.

Kindly find attached a fax as forwarded to me by Costas. This fax was provided to Costas by James Richardson Ltd as a kind of evidence that Osilan Trading Ltd is supplying Unifil in Lebanon with cigarettes.

In the meantime, I have requested a reliable 'contact' to verify with the Commander of Unifil Lebanon, the Italian Maj. Gen. Graziano, if mentioned Osilan Trading Ltd in Cyprus supplies the Unifil forces in Lebanon with cigarettes and if yes if we can get details of previous shipments and if they expect a shipment of almost 10 million cigarettes.

FYI

Best regards,  
Willem

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**From:** Francis, David  
**To:** Mulvey, Mark; Van Adrichem, Willem  
**Sent:** Tue Jun 02 23:51:56 2009  
**Subject:** FW: Israel DF May YTD actual sales  
Dear both,

Please find attached sales data for Israel DF.

I shall have more information when in Cyprus and shall contact Willem to discuss.



Regards,

David.

---

**From:** Khudorozhkova, Svetlana  
**Sent:** Thursday, May 28, 2009 5:23 PM  
**To:** Francis, David; Foo, Ming Lee  
**Subject:** Israel DF May YTD actual sales

Dear David and Ming Lee,

Attached please see Actual sales (up today) for Israel DF.

In case of questions please let me know.

Thank you and kind regards,  
Sveta

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**From:** Mulvey, Mark  
**Sent:** Thursday, May 28, 2009 5:47 PM  
**To:** Van Adrichem, Willem  
**Cc:** Francis, David; Reynolds, David A  
**Subject:** Israel DF

Dear Willem,

I briefed David who is the Head of WWDF. He is checking on the customer list, brand distribution, etc. The KYC file listed only one customer but David believes there may be additional ones. He will get back to us. He plans to be in Limassol next week meeting with IBCS. If you are in town, please arrange to meet with him – thanks, Mark

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**From:** Mulvey, Mark  
**Sent:** Thursday, May 28, 2009 5:19 PM  
**To:** Mulvey, Mark; Reynolds, David A  
**Cc:** Van Adrichem, Willem  
**Subject:** RE: 2 containers from Israel to the Netherlands  
**Importance:** High

Dave - I have a meeting at 1600 today with new head of DF David Francis. Based onn my previous inquiry, we only have one customer – James Richardson Ltd. Do we have anything linking Richardson to CSE?

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**From:** Mulvey, Mark  
**Sent:** Thursday, May 28, 2009 10:09 AM  
**To:** Reynolds, David A  
**Subject:** RE: 2 containers from Israel to the Netherlands

I'll talk to Duty Free here.

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**From:** Reynolds, David A  
**Sent:** Thursday, May 28, 2009 6:36 AM  
**To:** Mulvey, Mark  
**Subject:** Re: 2 containers from Israel to the Netherlands

Mark,

If this information is correct, this is a big diversion. Can we approach DF now to get records of all sales/shipments to Israeli customers?

I alerted OLAF to, hopefully, prevent us getting hit with the penalties. Plus, neither Belgian nor Dutch Customs have allowed us to inspect shipments heading to Loendersloot before. Hopefully, OLAF can push them to do a check in this case. - Dave

Sea Way Bill ZIMUHFA194031 (see attached) ZIMU1384996 Camel Blue 120 cases on 4 pallets Camel King Size 150 cases on 5 pallets ZCSU2709989 Winston Blue 300 cases More Menthol 100 cases Camel Orange 50 cases Camel Silver 50 cases Winston Classic Red 120 cases More Red 100 cases Shipper: C.S.E. Overseas Trading Ltd 223, Chr. Hadjipavlou Ave. 3036 Limassol Cyprus Consignee – Notify Party: Loendersloot Intl. Expeditie B.V. Kooldreef 7 4703 RE Roosendaal Tel: +31 165550208 Fax: +31 165555129 Loading vessel: HS Chopin Port of loading: Haifa – 21 May 2009 Port of destination: Antwerpen – 30 May 2009 Page 1 of shipment 2 containers from Israel to the Netherlands

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**From:** Reynolds, David A  
**To:** Van Adrichem, Willem  
**Cc:** Robalo Da Silva, Vitor Manuel  
**Sent:** Thu May 28 12:30:10 2009  
**Subject:** Re: 2 containers from Israel to the Netherlands

Willem,

Who is in touch with the source now? What terms have been agreed? Is she expecting rewards? If so, how much for what sort of information?

We need copies of Packing List and Invoice for this shipment. We also need any other correspondence or documents she can find to do with this deal. Everything.

We also need someone to do follow up in Israel. Do you have someone? If not, let me know and we'll put our heads together. We need a backtrack of this container - who pulled it out in Haifa? What warehouse in went to? Who packed it, etc?

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**From:** Reynolds, David A  
**To:** Van Adrichem, Willem  
**Sent:** Wed May 27 21:47:03 2009  
**Subject:** Re: 2 containers from Israel to the Netherlands

Cartons = cases? You have page 2 of the Bill of Lading?

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**From:** Van Adrichem, Willem  
**To:** Reynolds, David A  
**Sent:** Wed May 27 21:44:12 2009  
**Subject:** 2 containers from Israel to the Netherlands

Dave,

Attached HCRR00002434

## **Intelligence Report**

**Subject:** Possible Diverted Cigarettes from Israel to the Netherlands

**Summary:**

Received earlier today a copy of attached Sea Way Bill no: ZIMUHFA194031, (see images) which shows:

Name Shipper / exporter:  
C.S.E. Overseas Trading Ltd  
223, Chr. Hadjipavlou Ave.  
3036 Limassol Cyprus

Consignee:  
Loendersloot Intl. Expeditie B.V.  
Kooldreef 7, 4703 RE Roosendaal  
Tel: +31 165550208  
Fax: +31 165555129

Notify:  
Loendersloot Intl. Expeditie B.V.  
Kooldreef 7, 4703 RE Roosendaal  
Tel: +31 165550208  
Fax: +31 165555129

Loading vessel: HS Chopin  
Port of loading: Haifa  
Port of destination: Antwerpen

Received by separate message the container details:

Container:

20' ZIMU1384996 -

- Camel Blue 120 cartons on 4 plts
- Camel King Size 150 cartons on 5 plts

Container:

40' ZCSU2709989 -

- Winston Blue 300 cartons
- More Menthol 100 cartons
- Camel Orange 50 cartons
- Camel Silver 50 cartons
- Winston Classic Red 120 cartons
- More Red 100 cartons

According Track & Trace the vessel with both containers is scheduled to arrive in Antwerp on 30 May 2009.

**Images:**

<b>SHIPPER'S NAME &amp; ADDRESS</b> C.B. & OVERSEAS TRADING LTD 373, CHE MADRAPAYOU AVE 1036 LIMASSOL, CYPRUS		<b>SHIPPER'S NO.</b> 2014030751 <b>SHIPPER'S TEL. NO.</b> ZIMSAFE194031	
<b>CONSIGNEE'S NAME &amp; ADDRESS</b> LONDEKSDIOT INTL. EXPEDITE B.V. KOOLDRIEP 7 4703 RE ROOSENDAAL HOLLAND TEL: 0163 56 02 00 FAX: 0163 56 51 29		<b>OVERSEAS NOT NEGOTIABLE</b> THIS IS A NON-NEGOTIABLE DOCUMENT THE CARRIER'S LIABILITY IS LIMITED TO THE CARRIER'S ACTUAL NEGLIGENCE ONLY THIS DOCUMENT IS VALID FOR THE CARRIER'S ACTUAL NEGLIGENCE ONLY	
<b>INDUSTRIAL</b> <b>SHIPPER'S NAME &amp; ADDRESS</b> LONDEKSDIOT INTL. EXPEDITE B.V. KOOLDRIEP 7 4703 RE ROOSENDAAL HOLLAND TEL: 0163 56 02 00 FAX: 0163 56 51 29		<b>ALLOWED EXEMPTIONS OR OTHER PROVISIONS</b> SHIPPED ON BOARD 3349590 CLEAR ON BOARD CYCIC FREIGHT PREPAID	
<b>PORT OF ORIGIN</b> ANTWERPEN		<b>PORT OF DESTINATION</b> HAMBURG	
<b>DATE OF SHIPMENT</b> 20140307		<b>DATE OF RECEIPT</b> 20140307	
<b>SHIPPER'S CONTACT</b> MS CHOPIN		<b>SHIPPER'S CONTACT</b> SHY HANFA	
<b>SHIPPER'S TELEPHONE</b> 0163 56 02 00		<b>SHIPPER'S TELEPHONE</b> 0163 56 02 00	
<b>SHIPPER'S FAX</b> 0163 56 51 29		<b>SHIPPER'S FAX</b> 0163 56 51 29	
<b>ANTWERPEN</b>			
<b>PARTICULARS AS FURNISHED BY SHIPPER</b>			
AS PER ATTACHED LIST			
<b>2 CONT. TOT. TARE : 6430</b>			
<b>CANGOW</b>			
<b>20,000.000</b>			
<b>EUR</b>			
<b>INTERNATIONAL SHIP SECURITY</b>			
<b>TERMINAL HANDLING CHARGE - DESTINATION</b>			
<b>REAWAYAL - NO ORIGINAL ISSUED</b>			
<b>318.00</b>			
<b>EUR</b>			
<b>318.00</b>			
<b>INTERNATIONAL SHIP SECURITY</b>			
<b>TERMINAL HANDLING CHARGE - DESTINATION</b>			
<b>REAWAYAL - NO ORIGINAL ISSUED</b>			
<b>318.00</b>			
<b>EUR</b>			
<b>318.00</b>			

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**From:** Reynolds, David A  
**Sent:** Wednesday, May 20, 2009 8:59 AM  
**To:** Van Adrichem, Willem  
**Cc:** Mulvey, Mark; Robalo Da Silva, Vitor Manuel; Douglas, Craig; Cuvelier, Patrick  
**Subject:** RE: meeting with target

Willem,

The KYC d-base shows James Richardson Ltd of PO Box Ben Gurion Airport 70100, SAP Number 900223, as a customer of Israel DF certified in 2007. Full company details are in the d-base. Link is <http://moss.jti.com:7000/default.aspx>. You should have been given access to this. If not, let me know.

Sassower looks like a large freight forwarder. The firm's president, Gad Sassower, was/is on the Executive Committee of the Israel-America Chamber of Commerce and met with the Governor of Florida in that capacity in May 2007.

You can find details on Sassower at [www.sassower.com](http://www.sassower.com). It's slow opening in the Hebrew version but if you hit the Google translate option it opens immediately.

As for next steps, I would propose the following.

1. You should find from the Regional DF head – not the Israel one -- what they sell to Richardson – brands, amounts, codes, etc – and what market this firm covers – ship store, airport, etc. This needs to be closely held for now. Once we have an idea of brands and amounts and market, we can decide next steps for looking at this firm more closely.
2. We arrange an immediate -- correct and full debrief this time – of Ms Polueciu. This one will need to address very specifically her background, motivations, and aspirations. Is she looking to get paid? Why is she sharing this information? It also needs to follow up on the much more specific information originally passed to us via Latif – she gave him specific numbers and brands. Also, we need to determine her exact relationship with Latif. Same goes for her access. What information does she see – invoices, packing lists, inspection reports, etc, etc? Does she know customers? Can she introduce a new one? What exactly is her job? What is her relationship with her boss and her colleagues? Also, although I presume she speaks English, we need to confirm this is the case.
3. I would propose we ask David H to come in and do the interview this time. He knows the business and can do a full and correct debrief on camera by the book. I would prefer that we have one of our people in the room to ensure company-specific topics are addressed in detail. Patrick is a logical choice, especially since Loendersloot is again prominent in this case.

4. We need to get from Panikos further details on how their conversation with them went. Where was this done? Who exactly met her? Was it Panikos or someone else? Under what circumstances? Was she scared, cooperative, friendly, reticent, etc, etc. All of this is key for constructing the follow on debriefing. We also need to know what names they used with her and what "excuse" they used for the interview? Did they mention our name? Also, what contact arrangements have been made with her? Do they have email or phone contact protocols? If so, what are these? They will be needed in order to arrange a hand off, which may be difficult since this will be the third time she's been spoken to. If I was her, I'd be very leery of talking again. Thus, we need to do it the right way this time.
5. For us to take action, we need tangible evidence of diversions. This has to be either an inspection – or quick look – that gets us samples, pictures, codes, etc or maybe a controlled buy - or buy discussions to the point we confirm brands, codes, etc. Full sets of documents on shipments would be good, but unless they name Richardson and/or show codes or pictures of the goods, this may not be good enough to confirm/deny Richardson's culpability. I mention this, since these goals will need to drive the talks with Ms Polueciu.

11/5/09

On 08/05/09 between 16:30-17:00 the target and our Agent had a meeting in Limassol. Our agent put to her some questions and she gave the following answers:

What is your name?  
Polueciu Lumina.

For how long have you been working for your supervisor?  
For about 1 year.

What does your office deal with?  
It deals with hire-purchase of cigarettes, alcohol, and perfumes.

Do you know where he buys the cigarettes from?  
He buys the cigarettes from Israel.

From who?  
From someone named J. Richardson.

Do you have further information/data?  
Yes, but I don't have it with me now.

Do you know where the cigarettes are sent to?  
To a workhouse, in Netherlands and Turkey.

Do you know which workhouse is it?  
It's the Loenderstout workhouse in Netherlands.

Do you have further information/data?  
Yes, in the office.

How often does he send cigarettes?  
1 or 2 times a month.

What quantity does he send each time?  
One container.

Do you know what brands?  
Different brands like Winston, Camel, More, Marlboro and others.

How does he pay?  
He pays via Laiki Bank.

Who prepares the documents for the hire-purchase and payment?  
They are prepared in Israel by the company that he cooperates with.

Which company is that?  
J. Sassover.

Where exactly is the company located in Israel?  
In Haifa.

Do you have any information on the company?  
Yes, in the office.

Do you know if the cigarettes are original or a copy?  
No, I don't know.

What are your duties in the office in Cyprus?  
I work as a secretary, I answer phone calls, and I prepare different kinds of documents.

What does he deal with in Cyprus?  
He imports alcohol and perfumes.

Who does he cooperate with in Cyprus?  
He cooperates with the company Allfreyd.



David A. Reynolds  
Brand Integrity Operations  
JTI (China) Ltd.  
Direct: +852 2585 9388  
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**From:** Van Adrichem, Willem  
**Sent:** Tuesday, May 19, 2009 4:38 PM  
**To:** Reynolds, David A  
**Cc:** Mulvey, Mark; Robalo Da Silva, Vitor Manuel; Douglas, Craig  
**Subject:** FW: meeting with target

Dave,

Kindly see today's email from Panikos (Focus) regarding the second meeting with the source + my response to him.

Attached is the document of the Israeli company allegedly responsible for the shipments from Israel. (Mark, for you info I have also attached the first report)

The details of the Israeli company are:  
**J. Sassower – Overall Services For International Trade**  
**Haifa: Haatzmaut St. 37, P.O. Box 33698,**

Zip 31336,  
Tel: +972 48608608  
Fax: +972 48641778

Center: Ofek Building, P.O. Box 24,  
Lod, Zip 71366  
Tel: +972 89144100  
Fax: +972 89295096

The details of the Dutch company are:  
F. Loendersloot  
Internationale expeditie B.V.  
Kooldreef 7,  
4703 RE Roosendaal - Holland  
P.O. Box 1419 – 4700 BK Roosendaal  
Tel: + 31 165550208  
Fax: +31 165555129  
E-mail: [finance@loendersloot.com](mailto:finance@loendersloot.com)  
Bank: GE Artesia Bank, Breda NL  
IBAN: NL98 ARTE 0633888281  
BIC: ARTENL2A

As mentioned in my email to Panikos, I am very unhappy about their professional services and see no reason to continue with them. I will wait for the details for the 'container full of cigarettes' and afterwards will meet Panikos and explain that we do not expect his services for this 'target' anymore.

Tomorrow evening I have a meeting with a representative of a possible SP called Global Source and will find out what are their capabilities in Cyprus. (it was said at an earlier meeting that their Head Office is in the USA but that they have an office in Cyprus headed by a former Cyprus Intelligence person).

Dave, if I am not confident after tomorrows meeting with the representative of Global Source I likely need your assistance by a follow-up debriefing of the source. (you mentioned in a previous email that you might have a candidate)

Will keep you informed.

Best regards,  
Willem  
Ps. I will insert all details in the db.

---

**From:** Van Adrichem, Willem  
**Sent:** Tuesday, May 19, 2009 10:52 AM  
**To:** 'Focus'  
**Cc:** Robalo Da Silva, Vitor Manuel  
**Subject:** RE: meeting with target  
**Importance:** High

Dear Panikos,

I am very disappointed by this way of reporting - I explained you in person, by telephone and after the first interview by below message:

*Further to my previous email and our telephone conversation, the main thing we want to know is if she has access to information of use – namely details on shipments, brands, and where from and going – and, if so, establish a mechanism to obtain this information going forward. She needs to come to the meet with some “evidence” to establish her bona fides and we need to get full background details on her, to include motivation for talking. All meets need to be secure and covered with audio/video, if possible.*

I still don't have her full details - no answers to the above questions at all and your report after the second meeting: "Lumina estimates that a container full of cigarette will be sent this week. if this happen she will let us know" even raises more questions, like From where; which brands of cigarettes; the quantity; who will provide the shipping documents; what is the destination etc.

Kindly let me know the details of this week's shipment as soon as possible, however ensure we will get a copy of the document and answers to the above mentioned questions.

I will call you next week to arrange a meeting discussing the above.

Thanks,  
Willem

---

**From:** Focus [mailto:focus@avacom.net]  
**Sent:** Tuesday, May 19, 2009 9:45 AM  
**To:** Van Adrichem, Willem  
**Subject:** meeting with target

Dear Willem,

On 15/5/09 between 11:20 - 11:30 hrs, our Agent had a meeting in his office at LImassol with the Target (POLUECIU LUMINA), during which the latter gave to our agent full details of Israel company J. SASSOWER and of the Netherlands Company LOENDERSLOOT (have been sent yesterday), with whom the CSE OVERSEAS is cooperated.

Lumina estimates that a container full of cigarette will be sent this week. if this happen she will let us know.

Kind regards,

Panikos Hadjiloizou

---

**From:** Mulvey, Mark  
**Sent:** Saturday, March 07, 2009 12:36 AM  
**To:** Reynolds, David A  
**Subject:** Re: Request for Assistance

Dave - call off Patrick going to Cyprus and Willem should not meet with anyone on Monday. We need to discuss in more detail - thanks, Mark

---

**From:** Reynolds, David A  
**To:** Mulvey, Mark  
**Cc:** Van Adrichem, Willem  
**Sent:** Fri Mar 06 12:11:23 2009  
**Subject:** RE: Request for Assistance  
Mark,

Austin had a copy of this email. He said they can do nothing in the Netherlands since we have no specifics on the shipment. He says even if they asked, the Dutch would not pursue it further. He said they planned to follow up in Cyprus, where he says they have excellent contacts.

This may impact Willem's planned operation next week to meet and debrief the original source, which we hoped would give us further details to confirm/deny the allegations and, if positive, give us details to allow further investigation and/or intercepts. - Dave

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**From:** Mulvey, Mark  
**Sent:** Thursday, March 05, 2009 5:52 PM  
**To:** Reynolds, David A  
**Subject:** FW: Request for Assistance  
**Importance:** High

Dave – please pass to Austin – thanks, Mark

---

**From:** Mulvey, Mark  
**Sent:** Monday, March 02, 2009 9:29 AM  
**To:** Austin Rowan (austin.rowan@ec.europa.eu); Austin Rowan (RightFax)

**Subject:** Request for Assistance  
**Importance:** High

Dear Austin,

We are following up on the allegation that CSE Overseas Trading on Cyprus has shipped to Loendersloot several hundred cases of cigarettes bearing JTI Group trademarks. As CSE is not a customer of JTI, we would like to determine if there is any substance to this allegation. We would appreciate any assistance you can provide in establishing if now or in the past CSE has had shipments sent to Loendersloot.

Thanks and best regards,

Mark

---

**From:** Reynolds, David A  
**Sent:** Thursday, April 02, 2009 4:12 PM  
**To:** Van Adrichem, Willem; Mulvey, Mark  
**Cc:** Robalo Da Silva, Vitor Manuel  
**Subject:** RE: FOCUS report re. CSE Overseas Trading in Cyprus

Also, see attached and below. CSE showed up last year with 350 cases of WINSTON in Loendersloot as part of our look into Theodosiou. Willem - Vitor - can you add this background into the D-base too? Thanks -- Dave

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

From: Reynolds, David A  
Sent: Thursday, July 31, 2008 11:06 AM  
To: Mulvey, Mark  
Cc: Payne, Steve  
Subject: RE: Chris Theodosiou

Mark,

Enrique Fernandez and the Winston deal seemed to have dropped off the radar screen since January. We don't know if they finalized the deal or not. I know Steve was attempting to do some follow up to fully identify Fernandez but I defer to him for results. Following is what we have on file for him.

Enrique Fernández  
Address: Martín Fierro 2583 bis, apto. 902, (11.600) Montevideo, Uruguay  
Tel: +598 24861288, +598 99631880  
Email: efernand@adinet.com.uy  
MSN Messenger: efernand19@msn.com  
Yahoo! Messenger: efernand19@yahoo.com  
Google Talk: efernand19@gmail.com  
Skype ID: enriquefernandez

As for Theodosiou's other activities, we do know that the Roosendaal Warehouse in Loendersloot sent him the attached report on 350 cases of Winston they apparently have on hand.

In recent weeks, Theodosiou has been approaching different suppliers in an attempt to buy 100+ case amounts of Camel, More Menthol, and Winston box ex Loendersloot, but I have not seen any evidence he has found a supplier. He also has been in talks with Northshore Distributors regarding 20-foot containers each of Marlboro and L&M with Arabic health warnings which apparently are sitting in a Loendersloot warehouse. Theodosiou is the potential buyer -- for an unknown client - - while Northshore is trying to sell.

As for supplies on hand in Loendersloot, in addition to the 300 cases of Silk Cut Purple we have been looking at, the following seem to be available via various brokers as of mid to late July.

450 cases L&M English and Arabic HW at US\$255/case  
400+ cases Marlboro with Arabic HW  
400 cases Super Kings Blue at US\$215/case  
100 cases B&H 5000s (big HW) US\$215/case  
78 cases B&H 5000s (small HW) US\$215/case  
57 cases Dunhill KS Red (old design)  
103 cases Dunhill KS Button 5000s  
82 cases Winfield  
29 cases Rothmans Special Mild  
133 cases HB  
1,060 cases Captain Black Cherrise  
1,600 cases Vogue Blue 5000  
Unknown large amounts of Gold Classic (Raquel)  
450 cases SE 555 KS at US\$430/case  
600 cases B&H at US\$469/case  
420 cases Rothmans International at US\$469/case  
420 cases Rothmans Royals at US\$469/case  
420 cases Rothmans KS at US\$428/case  
600 cases Dunhill International at US\$439/case  
300 cases Dunhill Button Blue at US\$393/case  
215 cases Winston Box Red at US\$347/case  
50 cases Peter Stuyvesant at US\$423/case  
60 cases Kent Blue Future at US\$449/case

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**From:** Van Adrichem, Willem  
**Sent:** Thursday, April 02, 2009 3:07 PM  
**To:** Mulvey, Mark; Reynolds, David A  
**Cc:** Robalo Da Silva, Vitor Manuel  
**Subject:** FOCUS report re. CSE Overseas Trading in Cyprus

Dear both,

Kindly see the first report by Focus (Panicos Hadjiloizou) regarding the background checks on CSE Overseas Trading in Cyprus.

A meeting with him is scheduled for Tuesday 7 April in Nicosia to discuss the approach of the woman.

I will inform you after next weeks meeting with Panicos about the follow-up strategy.

FYI  
Best regards,  
Willem

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Date: 15<sup>th</sup> January, 2007

**TO WHOM IT MAY CONCERN**

Please note that the company of OSILAN TRADING LIMITED in Cyprus-Limassol Supplying most of our needs from cigarettes, liquers, cosmetics and chocolates in all Unifil PX shops.

We are in good relations with this company and have no problems in delivery time.

Chief Procurement Officer























Plant	Material	Family	Family Description	Brand Desc	Pack Type	Outer Type Code	Brand	Prime Market	Market Type
ADP1	12287559	CA	Camel	.....	SFP	TOO	RGXX E1	E1	2
ADP1	12339126	SA	Salem	Menthol.	CPB	TOO	MEME E1	E1	2
ADP1	12424896	MI	More International	Filter.	CPB	SIO	FLFL E1	E1	2
ADP1	12424944	MI	More International	Menthol.	CPB	SIO	MEME E1	E1	2
CHP1	12426165	MI	More International	Filter	SFP	SIO	FL B3	B3	2
CHP1	12426183	MI	More International	Menthol	SFP	SIO	ME B3	B3	2
CHP1	12447126	SA	Salem	Menthol	CPB	TOO	ME B3	B3	2
CHP1	12489532	WI	Winston	Filter	SFP	TOO	FL D3	D3	2
CHP1	12489577	WI	Winston	Lights	CPB	TOO	LT D3	D3	2
CHP1	12524521	WI	Winston	Balanced Blue	CPB	TOO	LTBB E1	E1	2
CHP1	12544111	WI	Winston	Balanced Blue	CPB	TVC	LTBB E1	E1	2
CHP1	12659536	WI	Winston	Filter	CPB	TOO	FL D3	D3	2
CHP1	12659548	WI	Winston	Lights	CPB	TOO	LT D3	D3	2
DEP1	12287559	CA	Camel	.....	SFP	TOO	RGXX E1	E1	2
DEP1	12287619	WI	Winston	Classic Red	SFP	TOO	FLCR E1	E1	2
DEP1	12306114	SA	Salem	Menthol Lights	CPB	TOO	MG B3	B3	2
DEP1	12339126	SA	Salem	Menthol.	CPB	TOO	MEME E1	E1	2
DEP1	12364473	SA	Salem	Menthol Green	CPB	TOO	MGMR E1	E1	2
DEP1	12424896	MI	More International	Filter.	CPB	SIO	FLFL E1	E1	2
DEP1	12424944	MI	More International	Menthol.	CPB	SIO	MEME E1	E1	2
DEP1	12454185	NF	Camel Natural Flavor	Natural Subtle Flavor	CPB	TOO	NLSF E1	E1	2
DEP1	12489532	WI	Winston	Filter	SFP	TOO	FL D3	D3	2
DEP1	12489577	WI	Winston	Lights	CPB	TOO	LT D3	D3	2
DEP1	12495613	NF	Camel Natural Flavor	Natural Lights Flavor	CPB	TOO	NL D3	D3	2
DEP1	12522583	WI	Winston	Classic Red	CPB	TOO	FLCR E1	E1	2
DEP1	12522658	WI	Winston	Classic Red	SFP	TOO	FLCR E1	E1	2
DEP1	12522997	NF	Camel Natural Flavor	Natural Full Flavor.	CPB	TOO	NFNF E1	E1	2
DEP1	12523264	NF	Camel Natural Flavor	Natural Full Flavor	CPB	TOO	NF D3	D3	2
DEP1	12524521	WI	Winston	Balanced Blue	CPB	TOO	LTBB E1	E1	2
DEP1	12528712	WI	Winston	Classic Red	CPB	JUM	FLCR E1	E1	2
DEP1	12551206	CA	Camel	Filter.	CPB	TOO	FLFL E1	E1	2
DEP1	12551242	CA	Camel	Blue	CPB	TOO	LTBL E1	E1	2
DEP1	12551275	CA	Camel	Orange.	CPB	TOO	MDOG E1	E1	2
DEP1	12551494	CA	Camel	Silver	CPB	TOO	SGSI E1	E1	2
DEP1	12552709	CA	Camel	Lights	CPB	TOO	LT D3	D3	2

DEP1	12552760	CA	Camel	Mild Filter	CPB	TOO	MD	D3	2
DEP1	12552787	CA	Camel	Super Lights	CPB	TOO	SG	D3	2
DEP1	12552829	CA	Camel	Filter	CPB	TOO	FL	D3	2
DEP1	12562666	CA	Camel	Filter.	CPB	JUM	FLFL	E1	2
DEP1	12563161	CA	Camel	Blue	CPB	JUM	LTBL	E1	2
DEP1	12563716	CA	Camel	Blue	CPB	POR	LTBL	E1	2
DEP1	12565024	CA	Camel	Regular (no filter)	SFP	TOO	RG	D3	2
DEP1	12630007	WI	Winston	Classic Red	CPB	MOB	FLCR	E1	2
DEP1	12636391	WI	Winston	Balanced Blue	CPB	MOB	LTBB	E1	2
PLP1	12514807	WU	Winston SS	Super Slims Blue	CPB	TOO	SHBL	E1	2
PLP1	12514939	WU	Winston SS	Super Slim Lights	CPB	TOO	SH	D3	2
PLP2	12516250	WU	Winston SS	Super Slim Lights Menthol	CPB	TOO	SN	D3	2
PLP2	12514807	WU	Winston SS	Super Slims Blue	CPB	TOO	SHBL	E1	2
PLP2	12514939	WU	Winston SS	Super Slim Lights	CPB	TOO	SH	D3	2
PLP2	12516250	WU	Winston SS	Super Slim Lights Menthol	CPB	TOO	SN	D3	2
RUP4	12602839	GX	Glamour Perfume Box	Pinks..	CPB	TOO	XUY0	E1	2
RUP4	12607549	GX	Glamour Perfume Box	Pinks..	CPB	TOO	XUY0	D3	2
TRP1	12302586	MX	Monte Carlo	Lights	CPB	TOO	LT	D3	2
TRP1	12524008	WI	Winston	Super Lights	ROC	TOO	SG	B3	2
TRP1	12529360	MX	Monte Carlo	Filter	CPB	TOO	FL	D3	2
USP1	12523264	NF	Camel Natural Flavor	Natural Full Flavor	CPB	TOO	NF	D3	2

ATTACHED LIST FOR B/L : ZIMUHFA194031

VESSEL: HS CHOPIN  
DISCHARGE PORT: ANTWERPEN

VOYAGE: 2/W  
DESTINATION:

LOAD PORT: HAIFA

<u>MKS &amp; NOS/SEAL NO</u>	<u>DESCRIPTION OF GOODS</u>	<u>WEIGHT</u>	<u>MEASUR.</u>
		<u>KGS</u>	<u>M3</u>
CONT:ZIMU1384986 1 CNT SEAL: 579262 /DV28 (CY/CY)	270 CARTONS ON 9 PALLETS OF CIGARETTES CUSTOMS SEAL:0037134	5,600.000	0.000
	SHIPPER'S LOAD STOWAGE & COUNT CONT TARE WEIGHT: 2750		
CONT:ZCSU2709089 1 CNT SEAL: 579284 /DV48 (CY/CY)	720 CARTONS OF CIGARETTES CUSTOMS SEAL:0037113	14,400.000	0.000
	SHIPPER'S LOAD STOWAGE & COUNT CONT TARE WEIGHT: 3680		
	2 CONT TOT. TARE : 6,430	CARGO W :	20,000.000

**LOENDERSLOOT**  
*internationale expeditie*

F. Loendersloot  
Internationale Expeditie B.V.

Visit Address: Kooldreef 7  
4703 RE Roosendaal - NL  
Mailing Address: P.O. Box 1419  
4700 BK Roosendaal - NL

Telephone : +31 (0)165 - 550208  
Telefax : +31 (0)165 - 555129  
E-mail : info@loendersloot.nl

Bankers : Banque Artesia  
Breda/NL  
Iban : NL98ARTE0633888281

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**PRE-ADVICE**

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C.THEODOSIOU ENTREPRISES LTD 1 ANDROCLEOUS STR. 4007 REFNR.: CEO50920  
LIMASSOL  
TEL.NR.:0035725811343 FAX NR.:0035725811348 Date: 17.07.2008

-----  
EX. : CSE OVERSEAS TRADING LTD  
RELEASE : AFTER PAYMENT  
REMARKS :

-----  
On behalf of: CSE OVERSEAS TRADING LTD  
we hereby inform you, that the undermentioned goods are available in our bonded  
warehouse at Roosendaal. We have inspected at random one case per brand,  
details of which are specified below.  
IMPORTANT

-----  
According to information received from our principals these goods will be put  
at your disposal in accordance with the abovementioned release-instructions.  
We cannot accept any responsibility nor can we give any guarantee whatsoever  
in this respect.

INSPECTION-DETAILS

200 50 Winston BalBlue 200 0.0 T1 C081281G/352G 84/BC/BHW/DF/FTB/RND/WF  
150 50 Winston BalBlue 200 0.0 T1 C081561J/355J 85/BC/BHW/DF/FTB/RND/WF