

REQUESTED BY: SALAZAR, ANA K
 O F F I C I A L U S E O N L Y

DEPARTMENT OF HOMELAND SECURITY ICE		TECS ACCESS CODE 3	
R E P O R T O F I N V E S T I G A T I O N		PAGE 1	
		CASE NUMBER LF08HM99LF0002	
TITLE: OCEAN DUKE CORPORATION			
CASE STATUS: INIT RPT			
REPORT DATE 093099	DATE ASSIGNED 090799	PROGRAM CODE 185	REPORT NO. 001
RELATED CASE NUMBERS: LF08HR99LF0003			
COLLATERAL REQ: SACLA			
TYPE OF REPORT: INVESTIGATIVE FINDINGS COLLATERAL REQUEST / IN			
TOPIC: SUBMISSION OF FALSE INVOICES BY OCEAN DUKE CORPORATION			

SYNOPSIS:

The Office of the Resident Agent in Charge, Lafayette, Louisiana (RAIC/LF), under the auspices of Operation Tailspin, is investigating fraudulent importation(s) of frozen, freshwater crawfish tail meat from China. The alleged fraud subsequently results in the circumvention of antidumping duty order number A-570-848. The RAIC/LF has received information that one scheme used by importers to pay less than the required antidumping duties is the false declaration of the exporter in China.

OCEAN DUKE CORPORATION (33-003236600) has been identified as a target of this operation. OCEAN DUKE CORPORATION is suspected of importing merchandise contrary to 19 USC 1481 (a) (2), resulting in a violation of 18 USC 545. OCEAN DUKE CORPORATION avoided payment of approximately \$212,759.00 in dumping deposits as a result of its fraudulent activity. The Automated Commercial System (ACS) shows an additional \$435,278.85 in dumping deposits not collected as a result of these activities. Details are reported herein.

DISTRIBUTION: RACLF SACNO SACLA	SIGNATURE: _____	
	FRANCIS	C V SENIOR SPEC AGENT

	APPROVED: _____	
	COBB	BARRY W RAC - RES. AGENT IN C
	ORIGIN OFFICE: LF LAFAYETTE - RAC	TELEPHONE: 318 262 6619
		TYPIST: FRANCIS

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O F F I C I A L U S E O N L Y

DEPARTMENT OF HOMELAND SECURITY ICE R E P O R T O F I N V E S T I G A T I O N C O N T I N U A T I O N	PAGE 2
	CASE NUMBER LF08HM99LF0002
	REPORT NUMBER: 001

DETAILS OF INVESTIGATION:

On July 13, 1999, OCEAN DUKE CORPORATION (ODC) submitted invoice number Y9906102 from YELIN ENTERPRISE COMPANY, LIMITED to the United States Customs Service along with a CF-3461 for entry number 221-1106913-8. The importer declared 91.5% antidumping duty deposits based on the invoice identifying HUAIYIN FOREIGN TRADE CORPORATION (30) as the packer of the merchandise. Import Specialist LaVonne Rees, assigned to Commodity Specialist Team 710 rejected the entry and advised correction as case #A570-848-000 at a dumping deposit rate of 201.63% on July 19, 1999. The correction, according to Rees' instructions, was to take place at the time of entry summary. The importer, on August 2, 1999, filed summary and made payment at the 91.5% dumping deposit rate. This failure to correct the entry resulted in a potential loss of approximately \$97,024.53 in antidumping duty deposits.

On or about August 3, 1999, ODC submitted invoice number E9907057 from EVER HOPE INTERNATIONAL CO., LTD to the Customs Service along with a CF-3461 for entry number 221-1107209-0. The importer, again, declared 91.5% antidumping duty deposits based on the invoice identifying HUAIYIN FOREIGN TRADE CORPORATION (30) as the packer of the merchandise. The merchandise was detained pending verification of the exporter of the merchandise. The invoice value declared on the shipment totaled \$97,299.00. The merchandise was shipped in container number OOLU5989999 on bill of lading number OOLU55693720. IS Rees at CST 710, again, advised ODC that the merchandise was subject to payment of antidumping deposits at a rate of 201.63% under case number A-570-848-000.

At the time of summary (8/20/99), however, the importer filed invoice number 99SD108 from HUAIYIN FOREIGN TRADE CORPORATION (30) attached to bill of lading number OOLU55693720. The new invoice listed an FOB price of \$1.80 per pound, roughly \$.45 lower than the original C&F invoice price of \$2.25 per pound. Declaration of a lower value, coupled with payment at the 91.5% antidumping rate has resulted in the loss of approximately \$115,735.00 in dumping deposits.

On August 23, 1999, IS Rees notified SSA Francis that information had been developed indicating that ODC had three additional entries pending. The entries were identified as 221-1107452-6, 221-1107453-4, 221-1107454-2. The entries listed Huaiyin Foreign Trade Corporation (30) as the exporter. These shipments were detained pending verification of the exporter of the merchandise.

On August 25, 1999, SSA Francis received a telephone call from Edward Lee, president of Louisiana Packing Company regarding freshwater crawfish tail meat

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O F F I C I A L U S E O N L Y

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 3
R E P O R T O F I N V E S T I G A T I O N C O N T I N U A T I O N	CASE NUMBER LF08HM99LF0002
	REPORT NUMBER: 001

from Huaiyin Foreign Trade Corporation in China. Lee stated that he was aware of previous intelligence provided to the RAIC/LF and the Customs Attache, Beijing, China regarding the submission of false invoices identifying Huaiyin Foreign Trade Corporation (5) as the exporter of crawfish tail meat to the United States for the purpose of paying less than the required antidumping duty deposits. He went on to state that, through direct contact with Yang Yi Xiang, general manager of Huaiyin Foreign Trade Corporation (5), he knows that the 91.5% antidumping deposit rate applies only to Huaiyin Foreign Trade Corporation (5). In addition, he stated, Huaiyin Foreign Trade Corporation (5), according to Yang Yi Xiang, was no longer exporting crawfish tail meat to the United States. Lee said that he is aware of U. S. importers using at least two Chinese exporters, Huaiyin Foreign Trade Corporation (30) and Huaiyin Foreign Trade Corporation (18) as suppliers of crawfish tail meat. These importers, Lee stated, were receiving the 91.5% rate. Lee also stated that Yang Yi Xiang stated that his company is not affiliated with or related to these firms.

On August 25, 1999, Edward Lee forwarded, by facsimile, a list of importers he said is not receiving merchandise from Huaiyin Foreign Trade Corporation (5). As a follow-up, Lee forwarded, on August 26, 1999, a facsimile containing a letter regarding this information to SSA Francis. The letter, dated August 24, 1999, was on Huaiyin Foreign Trade Corporation letterhead and signed by Yang Yi Xiang. In summary, the letter stated that Huaiyin Foreign Trade Corporation (5) is the only exporter in China subject to the 91.5% rate, that the firm is not related to any other firm using that name, and that Huaiyin Foreign Trade Corporation (5) had not shipped any merchandise to the United States during the 1999 crawfish season that began in May 1999.

Because ODC shipments from Huaiyin Foreign Trade Corporation (30) were being detained pending verification of the exporter, this information was forwarded to Inspector Yvonne Guzman and Import Specialist Tom Skinner in Los Angeles, CA on August 27, 1999. SSA Francis also discussed requesting an antidumping deposit rate of 201.63% prior to release of the three ODC entries with Import Specialist Michael Willis, team leader CST 710 on August 27, 1999. SSA Francis, in that August 27, 1999 conversation with IS Willis, also notified Willis of the Department of Commerce's pledge to clarify its instructions regarding the 91.5% antidumping deposit rate and its application only to Huaiyin Foreign Trade Corporation (5).

On September 3, 1999, SSA Francis was advised by Maureen Flannery at the Department of Commerce that clarifying instructions (message number ADA-9246116) relative to Huaiyin Foreign Trade Corporation (5) had been issued. The instructions clarify message number ADD-7262119 issued on September 19, 1997. The Department of Commerce clarified the name and address for case number A-570-848-003, stating the address and legal name(s) of the firm to

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DEPARTMENT OF HOMELAND SECURITY ICE R E P O R T O F I N V E S T I G A T I O N C O N T I N U A T I O N	PAGE 4
	CASE NUMBER LF08HM99LF0002
	REPORT NUMBER: 001

include Huaiyin Foreign Trade Corporation (5) and Huaiyin Cereals, Oils, & Foodstuffs Import and Export Corporation. As a result of this clarification, ODC should make a cash deposit of 201.63% of the value of the aforementioned shipments.

On September 6, 1999, SSA Francis learned that the ODC entries had been released on or about September 3, 1999. The importer has expressed an interest in exporting the merchandise as a result of the Customs Service's request for the additional payment/deposit of antidumping duties. The merchandise is currently in Boston, MA where the importer has stated that the containers will not be opened pending exportation. The RAIC/LF will work in conjunction with CST 710 in an attempt to collect the outstanding antidumping deposits relative to the aforementioned shipments.

The investigation continues.

UNDEVELOPED LEADS:

The RAIC/LF respectfully requests that the Office of the Special Agent in Charge, Los Angeles, CA, conduct the following collateral investigation:

- Determine the circumstances behind the dual invoicing outlined above;
- Determine the prosecutorial merit of these activities from United States Attorney;
- Request supporting documentation relative to these shipments from the importer.

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DEPARTMENT OF HOMELAND SECURITY ICE		TECS ACCESS CODE 3	
R E P O R T O F I N V E S T I G A T I O N		PAGE 1	
		CASE NUMBER LF08HM99LF0002	
TITLE: OCEAN DUKE CORPORATION			
CASE STATUS: INTERIM RPT			
REPORT DATE 113099	DATE ASSIGNED 090799	PROGRAM CODE 185	REPORT NO. 002
RELATED CASE NUMBERS: LF08HR99LF0003			
COLLATERAL REQ:			
TYPE OF REPORT: OTHER INFORMATION			
TOPIC: COLLECTION OF REVENUE - \$575,649.41 UNPAID ANTIDUMPING DUTIES			

SYNOPSIS:

The Office of the Resident Agent in Charge, Lafayette, LA (RAIC/LF) is conducting an investigation of OCEAN DUKE CORPORATION (33-003236600). The investigation is being conducted under the auspices of OPERATION TAILSPIN, a multi-discipline, multi-CMC strategic problem solving initiative. OCEAN DUKE CORPORATION is suspected of filing false invoice relative to the importation of frozen, freshwater crawfish tail meat from the People's Republic of China.

As a result of the cooperative efforts of the RAIC/LF and Commodity Specialist Team 710 in Los Angeles, CA, the importer has submitted payment of \$575,649.41 in unpaid antidumping duties. Details are reported herein.

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	FRANCIS C	V SENIOR SPEC AGENT

	APPROVED: _____	
	COBB BARRY	W RAC - RES. AGENT IN C
	ORIGIN OFFICE: LF LAFAYETTE - RAC	TELEPHONE: 318 262 6619
		TYPIST: FRANCIS

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O F F I C I A L U S E O N L Y

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 2
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER LF08HM99LF0002
	REPORT NUMBER: 002

DETAILS OF INVESTIGATION:

On September 3, 1999, the Department of Commerce published a clarification of message number 7262119, dated September 19, 1997 on antidumping case number A-570-848. Commerce stated in this message that ". . . . [f]or shipments of freshwater crawfish tail meat from the People's Republic of China entered, or withdrawn from warehouse, for consumption on or after 3/26/1996, the Department is clarifying its cash deposit instructions for the following exporter to include the following information:

A-570-848-003, HUAIYIN FOREIGN TRADE CORPORATION
77 East Huaihai Road
Huaiyin, Jiangsu,
People's Republic of China

This company is also known as HUAIYIN FOREIGN TRADE CORPORATION No. 5 and HUAIYIN CEREALS, OILS, & FOODSTUFFS IMPORT AND EXPORT CORPORATION."

These clarifying instructions, in conjunction with other intelligence, led the OPERATION TAILSPIN team to suspect OCEAN DUKE CORPORATION of a dual invoicing scheme designed to reduce the liability for antidumping duties by more than 100%. CST 710 in Los Angeles, CA rejected the suspect entries and, in response to the OPERATION TAILSPIN request, OCEAN DUKE CORPORATION tendered \$575,649.41 in antidumping duties unpaid as a result of the aforementioned scheme.

Continued investigation by the RAIC/LF is expected to result in additional collection of revenue from OCEAN DUKE CORPORATION. Collateral investigation by the Office of the Special Agent in Charge, Los Angeles, California has been requested in connection with the false invoicing investigation of OCEAN DUKE CORPORATION.

The investigation continues.

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DEPARTMENT OF HOMELAND SECURITY ICE		TECS ACCESS CODE 3	
R E P O R T O F I N V E S T I G A T I O N		PAGE 1	
TITLE: OPERATION FISH-HOOK		CASE NUMBER HV08HM05LA0010	
CASE STATUS: INTERIM RPT			
REPORT DATE 031306	DATE ASSIGNED 031306	PROGRAM CODE 804	REPORT NO. 001
RELATED CASE NUMBERS:			
COLLATERAL REQ:			
TYPE OF REPORT: INVESTIGATIVE FINDINGS			
TOPIC: REQUEST SACLA TO PROVIDE COPIES OF DOC'S PERTAINING TO THE COMPANIES.			

SYNOPSIS:

On February 16, 2006, ICE Attach in Ho Chi Minh City, Vietnam received a collateral investigative request from SAC/LA seeking assistance in verifying whether the following Vietnamese exporting companies, Grobest & I-Mei Industrial Co., Ltd., Seaprodex Factory No. 16 and Yelin Enterprise, are commercially farming and exporting "ponga" to the U.S., and if so, to identify how the fish is transshipped through the aforesaid exporting companies.

SAC/LA also requested that ICE HCMC verify whether the above-mentioned Vietnamese exporting companies are legitimate companies, and any known relationships among these three companies.

Results of investigation conducted by ICE HCMC are as follows:

DISTRIBUTION: CAHV SACLA	SIGNATURE: _____ YEN KIMBERLY M ICE DEPORTATION OFFIC	
	APPROVED: _____ SELL RICK ICE ATTACHE	
	ORIGIN OFFICE: HV HO CHI MINH CITY, VI	TELEPHONE: 404 763 7816
TYPYST: YEN		

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O F F I C I A L U S E O N L Y

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 2
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER HV08HM05LA0010
	REPORT NUMBER: 001

DETAILS OF INVESTIGATION

(Please note that all the Vietnamese names referenced in this report of investigation will be mentioned in the order of LAST, Middle and First name in accordance with their cultural custom.)

Grobest & I-Mei Industrial Co., Ltd.

GIIC is one of the companies suspected of exporting Vietnamese catfish to Ocean Duke under the name of "ponga" to evade anti-dumping duties

On February 17, 2006, ICE Foreign Service National Investigation (FSNI) in Ho Chi Minh City (HCMC) contacted Grobest & I-Mei Industrial Co. (GIIC) located at 128 Dien Bien Phu Street, Ho Chi Minh City, and spoke with a female who identified herself as Mrs. Huong, General Accountant.

Mrs. Huong stated that GIIC is 100% foreign owned Taiwanese company and the General Director of GIIC is Mr. LIN Hsien You. Mrs. Huong stated that GIIC has three (3) factories in Vietnam:

- * Grobest, located at 104/5 Amata Road 2-4, Amata Modern Industrial Park, Bien Hoa, Dong Nai, Vietnam, this factory produces food and beverages;
- * Grobest frozen food factory, located at Nhan Dan b Hamlet, Tan Phong village, Gia Rai District, Bac Lieu province. This factory produces frozen shrimp for export.
- * Grobest factory, located at 104/2 2A Street, Bien Hoa City, Dong Nai province, which produces aquaculture feed.

Mrs. Huong told ICE FSNI that the Vietnamese government does not allow GIIC to operate as an authorized export agent and must therefore export their products (shrimp) directly from Vietnam to other countries, after paying an export tax to the Vietnamese government. Mrs. Huong claimed that GIIC has never exported catfish or any kind of fish from Vietnam.

On February 24, 2006, ICE FSNI called Grobest Frozen Food in Gia Rai, Bac Lieu (781) 610071 to talk to Mrs. PHAM Thi Thuy An, an employee of Grosbest Frozen Food. Mrs. Phan stated that Mr. LIN Hsien Chen is the Director of Grobest Frozen Food, and that that Grobest Frozen Food only produces frozen shrimp, and that no catfish has ever been processed in this factory.

On February 27, 2006, ICE FSNI spoke with Mrs. Huong again. During the subsequent conversation, Mrs. Huong told ICE FSNI that Grobest has factories and offices in Vietnam, Thailand, Malaysia, Indonesia, Philippines, Hong Kong, China, India, Taiwan and the USA.

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O F F I C I A L U S E O N L Y

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 3
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER HV08HM05LA0010
	REPORT NUMBER: 001

Mrs. Huong stated that GIIC produces aquaculture feed for shrimp and catfish at two factories in Dong Nai, and exports shrimp directly from Grobest frozen food to market. Mrs. Huong restated that the Vietnamese government does not authorize Grobest to operate as an authorized export agent for any Vietnamese company.

SEAPRODEX FACTORY NO 16

4 Phan Chu Trinh Street, Quy Nhon City, (056 891205), (893402), (056) 891254 (056) 892533, Fax: (056) 893200, Director is Banh Quang Ha.

February 28, 2006, ICE FSNI telephoned Seaprodex Factory 16 (SF16), in Quy Nhon. An unidentified Seaprodex employee told ICE FSNI that SF16 does not maintain any aquaculture farm(s) in which catfish are raised and that SF16's primary product is shrimp. The Seaprodex employee stated that SF16 does export on behalf of other companies as an authorized export agent. This employee provided the name and a cell phone number of the Director of Seaprodex Factory 16, Mr. BANH Quang Ha, 090-3508244.

YELIN ENTERPRISE

14 Nguyen Van Giai, Street, HCMC, Tel: 8223401 Fax: 8208862, (subscriber) LE Van Anh

February 17, 2006, ICE FSNI tried telephoning the number identified by SAC/LA, as belonging to Yelin Enterprise, to no avail. Contacts at the Vietnam Telephone Company provided the new address and phone number for Yelin Enterprise as follows:
56/32 Cay Tram Street, Ward 11, Go Vap District, Tel 5897274.

ICE FSNI subsequently telephoned the above referenced number, which was answered by a Vietnamese female who identified herself as PHAM Thi Thu, Secretary of Yelin Enterprise. Ms. Pham told ICE FSNI that Yelin Enterprise does not have any factories in Vietnam, and that Yelin Enterprise buys sea products from various local producers and then resells it to other companies. Ms. Pham identified the Director of Yelin Enterprise as a Chinese-Australian named TRUONG Trieu Truong. Ms. Pham verified that Yelin Enterprise was previously located at 348 Dao Duy Anh Phu Nhuan District. Ms. Pham told ICE FSNI that Director Truong was currently out of the office and would not return until February 27, 2006, however, Ms. Pham provided Director Truong's cell phone number as 0913804253.

On February 21, 2006, ICE FSNI spoke with the General Director of Seaprodex Da Nang, PHAM Manh Hoat, in attempt to acquire additional information about the Director of Yelin, Mr. Truong Trieu Truong. According to Gen. Director Pham, Mr. Truong is a Cambodian who immigrated to Australia in 1978 and subsequently

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DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 4
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER HV08HM05LA0010
	REPORT NUMBER: 001

married a Vietnamese woman in Hanoi.

On February 22, 2006, ICE FSNI dialed a private cell number of Yelin Enterprise at 0907168690. A Vietnamese female who identified herself as "Mrs. Thu" answered (this individual is not the same Ms. Pham Thi Thu previously identified in this report). Mrs. Thu told ICE FSNI that Yelin Enterprise has branch offices in Thailand, Hong Kong, Cambodia, Taiwan, China and Vietnam. Mrs. Thu also claimed that Yelin does not have any aquaculture farms or fish processing factories in Vietnam. Mrs. Thu stated that Yelin Enterprise is an authorized export agent only, and that Yelin Enterprise only exports catfish and shrimp on behalf of other Vietnamese companies. Mrs. Thu stated that Yelin Enterprise previously exported catfish from Vietnam to Hong Kong then transshipped it to the U.S., however, that Yelin Enterprise discontinued exporting catfish to the U.S sometime during December 2005. Mrs. Thu did not know why Yelin Enterprise had discontinued their exports to the U.S.

In order to complete this investigation, ICE HCM is requesting SAC LA to provide copies of all documentation pertaining to the above-mentioned companies, i.e. sales invoices, bills of lading etc. Please forward the requested documents to ICE HCM via fax ASAP at 011-848-821-6241

This investigation is ongoing.

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106

TECS II - LIST OF RELATED RECORDS

PAGE 1
TN007065

1 RECORD IS RELATED TO BASE RECORD

HV08HM05LA0010001

ROI CHV YEN

K 031306

HV08HM05LA0010

CASE CHV YEN

K 031306

OPERATION FISH-HOOK

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DEPARTMENT OF HOMELAND SECURITY ICE		TECS ACCESS CODE 3	
REPORT OF INVESTIGATION		PAGE 1	
		CASE NUMBER HV08HM05LA0010	
TITLE: OPERATION FISH-HOOK			
CASE STATUS: INTERIM RPT			
REPORT DATE 042406	DATE ASSIGNED 031306	PROGRAM CODE 804	REPORT NO. 003
RELATED CASE NUMBERS:			
COLLATERAL REQ:			
TYPE OF REPORT: INVESTIGATIVE FINDINGS			
TOPIC: MISCLASSIFICATION OF CATFISH TO AVOID ANTI-DUMPING DUTIES			

SYNOPSIS:
 On February 16, 2006, ICE Attach in Ho Chi Minh City, Vietnam received a collateral investigative request from SAC/LA seeking assistance in verifying whether the following Vietnamese exporting companies, Grobest & I-Mei Industrial Co., Ltd., Seaprodex Factory No. 16 and Yelin Enterprise, are commercially farming and exporting "ponga" to the U.S., and if so, to identify how the fish is transshipped through the aforesaid exporting companies.

SAC/LA also requested that ICE HCMC verify whether the above-mentioned Vietnamese exporting companies are legitimate companies, and any known relationships among these three companies.

Results of investigation conducted by ICE HCMC are as follows:

DISTRIBUTION: CAHV SACLA	SIGNATURE: _____ YEN KIMBERLY M ICE DEPORTATION OFFIC
	APPROVED: _____ SELL RICK ICE ATTACHE
	ORIGIN OFFICE: HV TELEPHONE: 404 763 7816 HO CHI MINH CITY, VI
	TYPIST: YEN

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O F F I C I A L U S E O N L Y

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE: 2
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER HV08HM05LA0010
	REPORT NUMBER: 003

DETAILS OF INVESTIGATION

On March 13, 2006 Mr. Dung, from the Economic Security Investigation (ESI) branch of the Ministry of Public Security contacted ICE FSNI to provide information pertaining to YELIN. According to Mr. Dung, he had conducted record checks pertaining to TGB Company and found that TGB Company was established in 2004, and that the director of TGB is Mr. Tien Hoa (1976). According to the official record maintained by the Department of Planning and Investment (DPI), TGB is registered as a public stock Company, with Mr. TRUONG (director of YELIN) holding 90% of TGB's 2.7 billion Vietnam Dong capitalization (about 180,000 USD), with Mr. Tien Hoa (the director of TGB) holding the remaining 10% (about \$ 20,000). However, in 2005 Mr. Truong sold all of his shares to Mr. Tien Hoa. According to Mr. Dung, TGB Company does not maintain any aquaculture farm(s) for the cultivation of seafood products.

On April 03, 2006 ICE FSNI met with Mr. Nguyen Thi Anh Ngoc (NGOC) who is on the Board of Directors for Vinh Long Aqua Produce Product Processing (VAPPP) located at 197 14/9 Street, Vinh Long town. The VAPPP is a factory, which is managed by IMEX Vinh Long, is the company that provided catfish to YELIN in 2002 and 2003. According to Mrs. NGOC, VAPPP signed an undisclosed number of contracts with YELIN and TGB in 2002, 2003 and 2004. Mrs. NGOC stated that according to the contracts, VAPPP must follow the instruction provided by YELIN on their order-form with regard to the packing, and labeling. Mrs. NGOC stated that she did not remember how many names have been used for catfish, however that most of YELIN's order-forms instructed VAPPP to label catfish under the name of grouper. Mrs. NGOC confirmed that VAPPP stopped working with YELIN sometime in 2004, when YELIN established their owned company, TGB.

ICE FSNI then asked Mrs. NGOC to provide a contract that VAPPP had signed with YELIN. Mrs. NGOC stated that she was not sure whether VAPPP still had maintained any copies, however that she will check and advise ICE FSNI later.

On April 04, 2006 Mrs. NGOC called ICE FSNI and stated that she had found a simple copy of a contract. Mrs. NGOC said that she did not want to fax or mail this copy to ICE FSNI because she does not want anyone from her company to know what she is doing, and requested that ICE FSNI pick it up in person. Later that same day, the director of VAPPP called the ICE FSNI to inform that he was unable to meet with ICE FSNI officially without the permission from People's Committee of Vinh Long province.

Later that same evening, ICE FSNI met with Mrs. NGOC and obtained contract #25/HDKT.2003, which the Vice Director of VAPPP, Mr. Bui Quang Hoi, had signed in conjunction with Mr. TRUONG Trieu Truong, Director of TGB, on October 24, 2003. This contract reflects that TGB ordered frozen catfish fillets from

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O F F I C I A L U S E O N L Y

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 3
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER HV08HM05LA0010
	REPORT NUMBER: 003

VAPPP under the name of grouper fillet "Paradise Brand" size 6/8, 10/8 40 pounds per carton and "Falcon Baie Brand" size 6/8 10 pounds per carton. Article 2 of the contract reflects that VAPPP must pack and label the shipments of catfish under the commercial name(s) as specified by TGB.

On April 10, 2006, based on the information and contract provided by Mrs. NGOC, ICE FSNI faxed a letter to Mr. TRUONG to arrange a meeting, however, Mr. TRUONG refused to meet with ICE FSNI. On April 11, 2006, Mr. TRUONG called ICE FSNI to state that he does not have free time for the meeting. Mr. TRUONG went on to state that TGB is his personally owned company, and that YELIN and TGB buy seafood products for resale on the domestic market only. MR. TRUONG also claimed that TGB and YELIN have never transshipped catfish under any other name(s).

ICE FSNI asked whether TGB or YELIN has ever signed any contracts in which they requested the packaging company to label catfish as grouper, or, had shipped their products under the name(s) of Paradise brand, Falcon Baie brand, or any other names. TRUONG stated that he has never signed any contract with any Vietnamese company because Vietnamese law does not allow foreign owned representational offices to conduct this type of business in Vietnam.

ICE FSNI then asked Mr. TRUONG whether YELIN has any sub-office(s) in Indonesia or Cambodia. Initially Mr. TRUONG had stated that YELIN had offices in those countries, however, he subsequently recanted claiming that YELIN does not have any sub-offices in either Indonesia or Cambodia. Mr. TRUONG then stated that YELIN's business affairs are not the business of DHS and threatened that he was going to report this incident to the Ministry of Public Security (MPS).

Thus far, investigation conducted by ICE HCMC has established that YELIN and TGB (Sea World), which are owned and managed by TRUONG Trieu Truong, has bought catfish from various local Vietnamese companies, and then transshipped the catfish after being labeled as grouper, and other fish species, at the direction of Mr. TRUONG. However, ICE HCMC has thus far been unable to determine whether any of these misclassified shipments have been shipped to U.S. markets.

This investigation is ongoing.

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TECS II - LIST OF RELATED RECORDS

PAGE 1
TN007065

HV08HM05LA0010003

1 RECORD IS RELATED TO BASE RECORD
ROI CHV YEN K 042406

HV08HM05LA0010

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