

COPY

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
APR 21 2005

United States District Court

BY DAVID J. MALAND, CLERK
DEPUTY

EASTERN DISTRICT OF TEXAS

In the Matter of the Search of
(Name, address or Brief description of person, property or premises to be searched)

APPLICATION AND AFFIDAVIT
FOR SEARCH WARRANT

3801 W. 14th Street #1906
Plano, Texas

CASE NUMBER: 4:05-M71

I Matthew A. Baechtle being duly sworn depose and say:

I am a(n) Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement and have reason to believe that on the property or premises known as (name, description and/or location) (SEE ATTACHMENT A)

in the EASTERN District of TEXAS there is now concealed a certain person or property, namely (describe the person or property to be seized)

(SEE ATTACHMENT B)

which is (state one or more bases for search and seizure set forth under Rule 41(b) of the Federal Rules of Criminal Procedure)

property that constitutes evidence of the commission of a crime, contraband, the fruits of crime, and is otherwise criminally possessed, concerning a violation of Title 22 United States code, Section(s) 2778(c) and Title 50 United States code, Section(s) 1705. The facts to support a finding of Probable Cause are as follows:

(SEE ATTACHED AFFIDAVIT OF SPECIAL AGENT MATHEW A. BAECHTLE)

Continued on the attached sheet and made a part hereof. XX Yes No

Signature of Affiant
Mathew A. Baechtle

Sworn to before me, and subscribed in my presence

April 21, 2005
Date

at Sherman, Texas
City and State

DON D. BUSH
United States Magistrate Judge
Name and Title of Judicial Officer

/s/ Don D. Bush
Signature of Judicial Officer

ATTACHMENT A

3801 W. 14th Street #1906, Plano, Texas 75074 is a 1000 square foot residential condominium built in 1985 constructed on Block 19, lot 1906 of the Pheasant Landing #9 subdivision in the City of Plano, Texas. It is a two-story condominium with a brown brick veneer on the outside and a composite shingle roof. The door is brown. The number 1906 appears on the eave above the door. Number 1906 is the second unit on the south end of the building..

ATTACHMENT B

1. All records and information relating to violations of the Arms Export Control Act (22 U.S.C. Sec. 2778, et seq. and International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1705),. The term "records" and "information" include all of the below-listed items of evidence in whatever form and by whatever means they may have been created or stored, including any electrical, electronic, or magnetic form (such as any information on an electronic or magnetic storage device, including floppy diskettes, hard disks, ZIP disks, CD-ROMs, optical discs, backup tapes, printer buffers, smart cards, memory calculators, pagers, personal digital assistants such as Palm Pilot computers, as well as printouts or readouts from any magnetic storage device); any handmade form (such as writing, drawing, painting); any mechanical form (such as printing or typing); and any photographic form (such as microfilm, microfiches, prints, slides, negatives, videotapes, motion pictures, photocopies).
2. All files and/or documents pertaining to any relationship between or among the following persons, including their and officers, directors, employees, and agents: Richard Chichakli, Victor Bout, Sergei Bout, Sanjivan Ruprah, San Air General Trading FZE, San Air General Trading LLC, Centrafrican Airlines, Air Cess, Irbis, Air Bas, Abidjan Freight, Air Pass, Cessavia, Air Charter Service, Air Zory, ATC Ltd, Cet Aviation Enterprise (FZE), Moldtransavia SRL, Nordic Ltd., Odessa Air, Santa Cruz Imperial Airlines, Transavia Network (TAN Group), NV Trans Aviation Network Group, Transaviation, Transavia Travel Agency, Vial Company, Westbound Ltd., and any other person or entity designated by the Department of Treasury, Office of Foreign Assets Control pursuant to Executive Order 13348. (hereinafter referred to as "named parties").
3. All records evidencing the named parties dealings in the air cargo business including, but not limited to: aircraft sale/purchase documentation, aircraft insurance documentation, aircraft registration Documents, flight logs, crew manifests, crew briefs, fuel purchasing agreements, re-fueling requests, overflight permission requests, landing/take-off permission requests, payment information for overflights/landing/take-off, clearance codes to overfly country, cargo manifests, hazardous material certificates/documentation, aircraft leasing documentation, invoices/contracts for cargo flights, end user certificates
4. All documents relating to registration and licensing of any named party with the Department of State, Department of Treasury, or any other U.S. or foreign regulatory authority.

5. All corporate documents for domestic and foreign companies, including articles of incorporation, shareholder lists, by-laws, minutes of meetings of boards of directors or minutes of meetings of officers of any of the named parties.
6. All bank records for corporate and personal accounts or evidence of monetary transactions that relate to transactions among the named parties (to included monthly statements, canceled checks, deposit tickets, deposited items, debit and credit memos, wire transfer advices, and correspondence).
7. All copies of e-mail transmission and correspondence and documents transmitted through the U.S. mail or by private carrier or by facsimile evidencing contacts among and the relationship among the named parties.
8. All documents, books and records, including accounting records, showing receipt and disposition of funds by the named parties.
9. All contracts, memoranda, letters, notes and other documentation evidencing business or personal dealings between the named parties and foreign businesses and individuals.
10. All address and telephone listings and books, telephone logs and phone bills of the named parties.

AFFIDAVIT

AFFIANT'S EXPERIENCE

I, Matthew A. Baechtle, state that:

1. I am a Special Agent with U.S. Immigration and Customs Enforcement (ICE) and have been so employed since March 2003. I am currently assigned to the Arms and Strategic Technologies Investigations (ASTI) Unit in the Office of the Special Agent in Charge, Washington D.C. As a federal agent, I am authorized to investigate violations of United States law. I am also authorized to execute arrest and search warrants issued under the authority of the United States.
2. Since graduating from the Federal Law Enforcement Training Center in Glynco, Georgia, I have conducted and participated in numerous investigations to include violations of Arms Export Control Act ("AECA"), 22 U.S.C. Sec. 2778 and associated regulations and the International Emergency Economic Powers Act ("IEEPA"), 50 USC Secs. 1701-1706 (1988). Through my training and experience, I have become familiar with a variety of means through which individuals and entities traffic in arms in violation of these laws.

REQUEST

3. This request for permission to search three Texas locations is the result of two coordinated criminal investigations. The first is an ongoing year and one-half federal law enforcement international criminal and grand jury investigation into the involvement of Americans and others, including Victor Bout, in international illegal arms trafficking with federal grand juries

operating in Washington, D.C. and Virginia. The second is an ongoing two-year law enforcement and federal Dallas grand jury investigation into the activities of Richard Ammar Chichakli, a resident of Richardson, Texas, and his admitted personal and professional association with the illicit international arms trafficker, Victor Bout.¹ This investigation is headed by Federal Bureau of Investigation Special Agent Dennis Brady.

4. As set forth below, I have probable cause to believe that during Charles Taylor's reign in Liberia, Victor Bout trafficked for profit multi-ton shipments of foreign military arms and defense items from Eastern Europe and Asia to Liberia, in violation of a well-established UN embargo. In addition, I have probable cause to believe that Richard Chichakli facilitated Bout's illicit profiteering, first, by assisting in establishing companies for Bout such as San Air General Trading ("San Air") that facilitated these shipments and then, for example, by assisting in the management of their operation as the Chief Financial Officer ("CFO"). I have probable cause to believe that, as an operating officer of the company, Chichakli knew of the illicit shipments. I also have probable cause to believe that Chichakli should have seen and retained records of these activities, which may be evidence of crime. Finally, because of the open and notorious nature of Bout's arms trafficking and because of Bout's close personal and professional association with Chichakli, I have probable cause to believe that the companies' involvement in Bout's illicit arms trafficking activities were known to Chichakli during the

¹Due to translation, Victor Bout's first name is variously styled "Viktor" and his last name styled "Butt," "But," "Bont," "Butte" and "Boutov." He is also known as "Vitali Sergitov." For convenience of the reader, the spelling "Victor Bout" is used throughout this affidavit.

relevant time period. Consequently, I have probable cause to believe that as a US person, Chichakli's assistance of Bout during the relevant time period violated United States laws against arms trafficking and United States laws against UN sanctions busting.² The term "US person" means a citizen of the United States or an alien lawfully admitted for permanent residence. 50 U.S.C. 1801(i).

5. The statements contained in this affidavit are based in part on the results to date of the investigations discussed in paragraph 3 above, and on information provided by me and by Special Agents and employees of the FBI, including Special Agents Dennis Brady and Michael Call. I have also included information provided to me by Defense Criminal Investigative Service Special Agent Billy Byassee, Internal Revenue Service Criminal Investigations Special Agent Ronald A. Loecker. In addition, I have drawn from other resources, including information contained in official reports of the United Nations ("UN"), law enforcement interviews of UN investigators, discussions with foreign law enforcement officers, published news articles and various internet sources, as well as on my experience and training as a Special Agent of ICE and that of my fellow federal investigators. I have also relied on the experience of experts in records preservation and retrieval, especially those experts in electronic data preservation and recovery.
6. Because this affidavit is being submitted for the limited purpose of securing search warrants

²In addition, any business Richard Chichakli conducted with Victor Bout after July 22, 2004, the date of Bout's designation as a denied person under US law, violates the International Emergency Economic Powers Act, 50 USC Secs. 1701-1706 (1988).

for the four locations specified below, I have not included each and every fact known to me or my fellow investigators concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that records and information, as detailed in Attachment B, which are evidence of a violation of the Arms Export Control Act, 22 U.S.C. Sec. 2778 and associated regulations, specifically 22 CFR Part 126.1(c), and the International Emergency Economic Powers Act, 50 USC Secs. 1701-1706 (1988), are presently located at the following three locations: (1) 811 S. Central Expressway, Suite 210, Richardson, Texas (the "Office"); (2) 225 Syracuse Place, Richardson, Texas (the "Residence"); and (3) 3801 W. 14th Street #1906, Plano, Texas (the "Condominium").

VIOLATIONS OF US LAW

7. Under the Arms Export Control Act, 22 U.S.C. Sec. 2778, it is a violation of US law for a US person to export, import or transfer any domestic or foreign defense article or service without previously registering with the US government and receiving a license to conduct the transaction. 22 USC Sec. 2778(b)(1)(A) *et seq.* In addition, it is a violation of US law to broker such transactions. *Id.* Brokering activities include "the financing, transportation, freight forwarding or taking of any other action that facilitates the manufacture, export, or import of a defense article or defense service." 22 USC Sec. 2778(b)(1)(A)(ii)(II). Military munitions are considered defense articles under these provisions. See 22 USC Sec. 2778(b)(1)(A)(ii)(IV) and 22 C.F.R. Part 121.1 *et seq.* (United States Munitions List). These provisions apply to non-US defense articles or services "regardless of whether such article or service is of United States origin or whether such article or service contains United States

origin components.” 22 USC Sec. 2778(b)(1)(A)(ii)(IV).

8. Pursuant to regulations promulgated pursuant to the Arms Export Control Act, 22 U.S.C. Sec. 2778, it is also a violation of US law for a US person to break a UN Security Council arms embargo.³ 22 CFR Part 126.1(c). In addition, it is the policy of the United States to deny licenses for the export of defense articles or services to countries to which the United States maintains an arms embargo, including Liberia. 22 CFR Part 126.1(a).
9. Any individual or entity that wilfully violates Section 2778 or its regulations issued pursuant commits a felony punishable by ten years’ imprisonment and a \$1,000,000 fine. 22 U.S.C. Sec. 2778©.
10. Under the International Emergency Economic Powers Act (“IEEPA”), 50 USC Secs. 1701-1706 (1988), the President of the United States has authority to designate individuals and entities and restrict business activities related to them. Any wilful violation of an IEEPA issued regulation is punishable by up to ten years’ imprisonment and a monetary fine of up to \$250,000 or under the alternative fines calculations under 18 USC Sec. 3571, twice the gross gain or loss, whichever is greater.

³UN Security Council Resolution 788, adopted November 19, 1992, established a general and complete arms embargo “on all deliveries of weapons and military equipment to Liberia. . . .” On March 7, 2001, in recognition of the expanding Liberia conflict, the Security Council issued a renewed and tightened weapons and military equipment embargo, which included all “arms and related materiel of all types, including weapons and ammunition, military vehicles and equipment, paramilitary equipment and spare parts for the aforementioned, whether or not originating in their territories[.]” The Security Council extended this embargo twice, first on May 6, 2002 through Resolution 1408 and next on May 6, 2003 through Resolution 1478. On December 22, 2003, the Security Council issued Resolution 1521 revising the Liberia arms embargo in part but retaining the embargo on all “arms and related materiel of all types, including weapons and ammunition, military vehicles and equipment, paramilitary equipment and spare parts for the aforementioned, whether or not originating in their territories[.]”

RICHARD A. CHICHAKLI

11. Richard Ammar Chichakli, aka Ammar M. Chichakli, is forty-six years old. He is a Syrian who is naturalized in the United States. Chichakli was born on March 28, 1959. He lives at 225 Syracuse Place, Richardson, Texas.⁴
12. Chichakli is married to Gloria J. Chichakli. Chichakli has two grown children, a daughter Ariel and son David.
13. According to a July 6, 2004 letter from the Social Security Administration's Office of the Inspector General, Chichakli has at least two Social Security Numbers: 405-41-5342 and 467-79-1065.
14. Chichakli is a certified public accountant with over 20 years experience. He operates an accounting business located at 811 S. Central Expressway, Suite 210, Richardson, Texas. The business is named "Chichakli, Hickman-Riggs & Riggs, PLLC, Certified Public Accountants."
15. Chichakli also has an extensive background in and an understanding of the aviation industry and its operations. In this regard, your affiant notes that Chichakli has taken credit for establishing the Free Trade Zone in the Sharjah International Airport, United Arab Emirates ("UAE"), an area used for items to transit quickly at reduced cost.
16. According to his published vitae, Chichakli holds an MBA from Embry-Riddle Aeronautical

⁴On April 14, 2005, the computerized records of the Texas Department of Public Safety were checked. Your affiant knows that Richard Ammar Chichakli, 225 Syracuse Place, Richardson, Texas 75081 has a valid concealed weapons permit expiring March 28, 2006, with SSN 467-79-1065, TX OLN 07844152, GLN 01166615 and is currently authorized to carry a concealed semi-automatic firearm in the State of Texas.

University with a minor in Aviation. He also claims to hold an MS in Accounting, and MS in Information Systems, and additional undergraduate business and science degrees. Chichakli also claims to be a Certified Information Systems Auditor, a Certified Fraud Examiner, a Certified Information Security Manager and a Certified Information Technology Professional.

17. From public records information, your affiant knows that 811 S. Central Expressway, Suite 210, Richardson, Texas is the location of at least eight additional Chichakli companies: (1) DHH Enterprises; (2) Central Africa Development Fund; (3) Chichakli and Associates; (4) Continue Professional Education, Inc.; (5) IB of America Holdings Inc.; (6) Orient Star Corporation; (7) Trans Aviation Global Group, Inc.; and (8) Airbus.

SAN AIR GENERAL TRADING

18. According to published UN Reports, in 2000, San Air General Trading FZE ("San Air FZE") was a Bout aviation business in the United Arab Emirates ("UAE"). Sergei Dennisenko managed the company. Richard Chichakli served as its Chief Financial Officer.
19. On June 6, 2000, Richard A. Chichakli applied for a certificate of authority for San Air General Trading, LLC ("San Air") to operate in Richardson, Texas. In his application filed with the Secretary of the State of Texas, Chichakli claimed that San Air's purpose was general trading, import and export.
20. Chichakli listed the address of San Air's principal office as P.O. Box 932-20C, Ajman, UAE. The address of the proposed registered office in Texas was 701 East Plano Parkway, Suite 112, Plano, Texas. The name of the registered agent was Richard A. Chichakli, CPA. Other

officers were Serguei Dennissenko and Vladimir Kviazeo. Each listed 701 East Plano Parkway, Suite 112, Plano, Texas, as their address of record.

21. Your affiant knows that 701 East Plano Parkway, Suite 112, Plano, Texas was the former address for Richard Chichakli's accounting business. According to Texas Franchise Tax Public Information Report for San Air General Trading, LLC dated February 25, 2002, San Air moved its business location to 811 South Central Expressway, Suite 210, Richardson, Texas, the location of Chichakli's current accounting business.
22. In a 2002 Investigative Report from The Center for Public Integrity, Chichakli admitted that "San Air is a company in the Free Zone. It is registered in Texas, too." Chichakli explained that San Air "wanted to have a maintenance facility for aircraft here, but it didn't work out." According to Chichakli, having a US presence gave the company more respectability.
23. Chichakli amplified his purpose in establishing San Air during a May 2002 interview with the Los Angeles Times. In that interview, Chichakli said that he set up San Air for Victor Bout to manufacture plastic parts for Russian planes. In a 2004 public interview, Chichakli added that "a US branch gives the company more respectability."
24. According to published reports, Chichakli filed an application for a certificate of withdrawal for San Air with the Secretary of the State of Texas on May 3, 2002.

**SAN AIR ARMS TRAFFICKING TO LIBERIA
IN POTENTIAL VIOLATION OF THE ARMS EXPORT CONTROL ACT**

Charles Taylor and West African War Crimes

25. In 1985, Charles Taylor escaped from a Massachusetts jail where he had been imprisoned and

was awaiting extradition for embezzlement from the Government of Liberia. Taylor fled the United States. In 1989, Taylor reappeared in West Africa and led a movement to overthrow Samuel Doe, then President of Liberia, through Taylor's rebel group, the National Patriotic Front of Liberia ("NPFL"). Taylor's efforts to unseat Doe succeeded after seven years of brutal civil war, in which approximately 250,000 lives were lost. In 1997, Taylor became the President of Liberia.

26. United Nations Security Council and public source reporting indicate that, as Liberia's President, Taylor attempted to control resources in neighboring West African countries, including Sierra Leone, by financing and supplying arms to rebel groups such as the Revolutionary United Front ("RUF"), who committed atrocities against the population of Sierra Leone.
27. The Liberians United for Reconciliation and Democracy ("LURD") was one of a number of groups that fought Taylor's forces. On April 12, 2005, your affiant spoke to Jonathan Stack, the director and producer of a DVD film titled "Liberia: An Uncivil War." The film features the LURD's efforts to oppose Charles Taylor. Graphic war footage, including dismemberment, disembowling and cannibalism, as well as the use of child soldiers, was featured.
28. The brutality of the West African conflict prompted the United Nations to impose weapons embargoes on Liberia. As discussed in note 4, *supra*, the UN embargo on weapons has continued in force since 1992 to the present. While the embargoes stanching the overt flow of weapons to Liberia, with the help of Victor Bout, among others, Charles Taylor began

importing weapons illegally.⁵

29. From information reviewed or supplied to your affiant, including the Reports of the Panel of Experts on Liberia, multiple interviews of its experts, reviews of UN primary materials, and independent corroborating criminal investigations both here and abroad, your affiant has probable cause to believe that on at least two occasions in 2000, Bout used his air transportation pipeline, including San Air, to bring weapons and defense items illegally into Liberia on behalf of Charles Taylor.⁶
30. These transactions violated US law. Richard Chichakli's status as a US person obligated him under AECA to obtain permission for his facilitation and assistance of these unlawful shipments of arms and defense articles to Liberia. He did not.⁷

Victor Bout

⁵Another such individual was a Dutch national, Gus Kouwenhoven. Kouwenhoven was the President of the Oriental Timber Company. As charged by the Dutch, Kouwenhoven brought weapons to Taylor by ship during Taylor's reign. On March 18, 2005, the Dutch arrested Kouwenhoven and charged him with war crimes for this and related conduct. Kouwenhoven is currently in custody in the Netherlands awaiting trial. In 2004 and 2005, your affiant has met Dutch authorities both in Sierra Leone and in the Netherlands and discussed this investigation extensively.

⁶On March 3, 2003, the Special Court for Sierra Leone indicted Charles Taylor for war crimes relating to his brutal reign as Liberia's President. The Special Court charged that Taylor bore the greatest responsibility for war crimes, crimes against humanity and serious violations of international and humanitarian law. Specific violations included murder, torture, rape, sexual slavery, terrorism, looting, unlawful recruitment of child soldiers and the murder and kidnaping of UN peacekeepers in the performance of their duties. In August 2003, facing mounting international pressure, Charles Taylor fled Liberia. Taylor is now a fugitive from the Special Court. Taylor lives in exile in Nigeria.

⁷Your affiant notes that Victor Bout's assistance of Richard Chichakli's violation of US law may also violate US law. See 18 USC Sec. 2 ("Whoever willfully causes an act to be done which if directly performed by . . . another would be an offense against the United States, is punishable as a principal.")

31. Victor Bout is an international arms trafficker.⁸ He is also an international fugitive and the subject of an Interpol Red Notice.⁹ As of July 22, 2004, Bout is also a denied party under US law.
32. By Executive Order 13348 dated July 22, 2004, the President of the United States declared a national emergency, stating that the activities involving former Liberia President Charles Taylor in the ongoing Liberia conflict, which included “the proliferation of and trafficking in illegal arms,” constituted an “unusual and extraordinary threat to the foreign policy of the United States.” Pursuant to that Executive Order, the President designated Victor Bout a denied person under US law. It is illegal for any US individual to do business with Bout after July 22, 2004, without proper permission from the Secretary of the Treasury. See 50 USC Secs. 1701-1706.
33. Bout controls a complex web of companies to move legitimate and illegitimate goods

⁸Your affiant notes that much of the Bout historical material contained in this affidavit is based on public reporting. However, your affiant is convinced that it is accurate. Over the past year and one-half, your affiant has interviewed numerous individuals, in the United States and abroad, including members of various United Nations Security Council West African Panels, international arms experts, pilots, air transportation workers and foreign law enforcement agencies, who have performed field investigations or know of Bout and his illicit arms trafficking activities. In doing so, your affiant has made four separate trips to Europe. Your affiant has also traveled to Sierra Leone and discussed Bout with the Special Court for Sierra Leone’s Chief Prosecutor, Chief Investigator, and the Special Court’s collection of international investigators. SA Baechtle has also conducted interviews in Thailand. Your affiant has interviewed a former general in Liberia’s military, as well as investigative reporters and filmmakers. In addition to these interviews, your affiant has reviewed relevant Security Council Reports and their Annexes. Your affiant has also reviewed primary source material for UN Panel conclusions on Bout’s illicit arms trafficking, which confirm the Panels’ conclusions. Finally, your affiant has replicated UN Security Panel findings through independent investigation.

⁹In 2002, Belgian authorities issued an arrest warrant for Bout, charging him with money laundering in connection with diamond trafficking and belonging to a criminal enterprise. Bout fled from Sharjah to Russia. Bout is currently an international fugitive on the Belgian warrant.

throughout Europe, Asia and Africa by air. From open source reporting, as well as interviews of UN arms trafficking experts, your affiant believes that Bout controls an active fleet of approximately 50 aircraft. These aircraft are registered to several Bout-related entities, primarily Centrafican Airlines, Air Cess, Irbis, Air Bas, and San Air General Trading. Other Bout-related entities include Abidjan Freight, Air Pass, Cessavia, Air Charter Service, Air Zory, ATC Ltd, Cet Aviation Enterprise (FZE), Moldtransavia SRL, Nordic Ltd., Odessa Air, Santa Cruz Imperial Airlines, Transavia Network (TAN Group), NV Trans Aviation Network Group, Transaviation, Transavia Travel Agency, Vial Company, Westbound Ltd.

34. Representatives of the Department of the Treasury have informed your affiant that on April 26, 2005, the Department of Treasury will expand the list of persons and entities designated under Executive Order 13348. This list will include Richard Chichakli, Sergei Bout,¹⁰ San Air, Airbus and other companies incorporated at 811 S. Central Expressway, Richardson, Texas. Under the Executive Order, all property belonging to a party designated is blocked or frozen and cannot be otherwise dealt with without permission from the Department of Treasury.¹¹ A complete list of those entities appears in Attachment C.

¹⁰Your affiant notes that Sergei Bout's first name and last name appears variously as "Sergei Bout," "Sergey But" and his last name appears as described in note 1. For convenience of the reader, the spelling "Sergei Bout" is used throughout this affidavit.

¹¹If approved, your affiant has planned to execute the search warrants sometime after 6 a.m. on April 26, 2005. Representatives of the Department of Treasury have indicated that their notice will become effective at 7 a.m. While the entry and search will be conducted under the authority granted by the Court in the search warrant, your affiant also notes that to be consistent with its administrative practice, the Department of Treasury intends to grant participating agencies licenses to deal with any blocked property encountered during the search warrant's execution. Your affiant understands that the authority granted under Treasury's license will be coextensive with any existing agency authority.

35. Bout gained his knowledge of arms and aviation while serving in the Russian military. In 1991, following the collapse of the Soviet Union, Bout began trafficking in military arms, primarily to the conflict zones of Angola, Congo and Afghanistan. These shipments included weapons such as rocket launchers, RPGs, AK-47s, grenades, ammunition and helicopter parts.
36. While maintaining a presence in the UAE, Bout based his air operations in Oostend, Belgium in the mid-1990's, but had aircraft registered in a web of companies, in locations such as the UAE, Liberia, Equatorial Guinea and South Africa. When United Nations, international investigative, domestic law enforcement or civil aviation attention became too great, Bout re-registered his planes and moved his air operations to new locations. In the late-1990s, Bout moved his air transport operation to South Africa and then to Swaziland. By early 2000, Bout had shifted his main air operation to the UAE.
37. While posing temporary set-backs, these moves did no lasting harm to the success of Bout's operation. Bout's ability and willingness to operate in war zones behind a corporate mask made him a favorite of government and rebel leaders such as Charles Taylor who needed Bout's illicit arms to fuel their conflict.

UN Arms Trafficking Investigations in Liberia

38. On March 29, 2001, the Secretary General of the United Nations appointed a Panel of Experts pursuant to paragraph 19 of Security Council resolution 1343 (2001) to investigate adherence to the UN embargoes on Liberia discussed in note 3, *supra*. The Panel was comprised of five members, each selected for their extensive subject matter expertise in embargo-related areas. The Panel based its investigation in Liberia but traveled throughout Africa and Europe on fact

finding missions during its six-month mandate.¹²

39. Belgian Johan Peleman was the Arms and Transportation Expert.¹³ At the time of his appointment to the Panel, Peleman served as the Director of the International Peace Information Service (“IPIS”), based in Antwerp, Belgium. IPIS was established in the late 1970's and functioned as a repository for expert information on arms trafficking and conflicts. Peleman had extensive academic and field experience in tracking the flow of weapons, defense items and money across Africa. Since at least the late 1990's, Peleman has conducted field interviews regarding arms and defense item trafficking in Africa, Eastern Europe and the Middle East.
40. Peleman had previously served as the Arms Expert on the UN's Panel of Experts for Sierra Leone Diamonds and Arms, S/2000/1995,¹⁴ and later as the Chairman of UN's Panel of Experts on Somalia. S/2003/1035. Mr. Peleman currently serves as an Arms Expert to the International Criminal Court (ICC) in The Hague, Netherlands, but also serves as the Head of Research at IPIS.

¹²The Panel agreed to use high evidentiary standards in its investigations. The Panel required at least two credible and independent sources of information to substantiate a finding. UN Report No. S/2001/1015 at p. 23.

¹³The additional Panel members were Mr. Martin Chungong Ayafor, (Cameroon — Chairman), Mr. Atabou Bodian (Senegal — Expert from the International Civil Aviation Organization), Mr. Harjit S. Sandhu (India — Expert from Interpol) and Mr. Alex Vines (United Kingdom — Diamond Expert).

¹⁴In their report dated December 20, 2000, the United Nations identified Victor Bout as “a well known supplier of embargoed non-State actors - in Angola, the Democratic Republic of the Congo and elsewhere. Bout oversees a complex network of over 50 planes and multiple cargo charter and freight forwarding companies, many of which are involved in shipping illicit cargo.” S/2000/1195, p. 11 par. 27.

41. Your affiant interviewed Johan Peleman over several days in January and in April, 2004 at Peleman's peace institute in Antwerp.¹⁵ The interviews centered on the Panel's reports, arms trafficking, Victor Bout, Bout-related entities, including San Air General Trading, and Richard Chichakli. Peleman also discussed methods Bout and other arms traffickers used to conceal their illegal activities.¹⁶ During these interviews, Peleman produced underlying support for Panel's findings. This support included photocopies of documentary evidence and allowing your affiant to view Peleman's original notes. The photocopies and notes confirmed Panel conclusions. In a telephone interview with your affiant on April 19, 2005, Peleman re-confirmed the accuracy of the UN's findings and supporting information reviewed by SA Baechtle.
42. The Panel issued its 116 page 465 paragraph single-spaced investigative report October 26, 2001 (S/2001/1015).¹⁷ The Report highlighted several instances where arms entered Liberia in violation of the UN arms embargo, tracing the arms and military defense items from the

¹⁵SA Baechtle has also consulted with Peleman by phone and by email.

¹⁶As the UN Panel of Experts on Liberia found that arms traffickers employed multiple techniques designed to avoid detection of themselves, their companies, their aircraft and their cargo. These techniques included: (1) Filing multiple requests to civil aviation authorities in different countries for flights occurring at the same time; (2) Using different brokering companies to issue flight requests for the same aircraft; (3) Using fraudulent flight documentation, including false plans, call signs, flight and tail numbers, cargo manifests and end user certificates; (4) Setting up complex corporate structures such that the operating agent for a particular flight, the aircraft owner, the company insuring the aircraft and/or the company insuring the cargo are registered by different companies in different countries, to include using multiple flags of convenience registries for aircraft registration. See S/2002/1115 p. 17 par. 62.

¹⁷In describing its work, it said that it had "painstakingly gone into details, followed various paper trails and put together pieces of the jigsaw puzzle to complete a picture of how Liberia has managed to get a regular supply of arms and ammunition despite an embargo on it since 1992." S/2001/1015 at p. 39 par. 173.

source to the end user. Two of these deals involved Bout companies San Air General Trading and Centrafrican Airlines. A subsequent Panel discussed Air Bas, a third Bout company. As is discussed below, these companies have been considered to be the same entity. Each is linked to Richard Chichakli.

San Air's July 2000 Shipment of Military Parts

43. The Panel found that on July 17-18, 2000, a Liberian registered Ilyushin 18, Tail No. EL-ALY, transported 7 tons of military aircraft parts and rotor blades from Bishkek, Kyrgyzstan through Cairo, Egypt to Liberia. See S/2001/1015 at pp. 42-46 par. 190-206. False flight destination paperwork accompanied the shipment. The Panel uncovered a complex series of contracts for what were represented to be MI-2 helicopter rotors and spare parts traced back to an April 2000 agreement between West Africa Air Services ("WAS") and San Air General Trading in which San Air was contracted by WAS to procure the items.
44. San Air was represented by Sergei Dennisenko. Your affiant believes that this is the same individual that Chichakli listed as an officer when he established San Air's Texas office. See par. 20, *supra*. Sanjivan Ruprah represented WAS. According to the UN, Dennisenko identified Ruprah as Victor Bout's partner in Africa.
45. The Panel concluded that the shipment contained MI-24 military helicopter rotors, not MI-2 civilian helicopter rotors. The Panel located end user certificates submitted to Kyrgyzstan authorities by the rotor supplier had identified the items as MI-24 rotors. When asked by the Panel, Kyrgyzstan authorities said that the rotor supplier had bought the rotors for an MI-24. Consequently, the Panel concluded that this shipment violated the UN's Liberia embargo

because it found that the rotors were for MI-24 heavily armed gun ships, not MI-2 civilian helicopters.

San Air/Centrafrican's November 22, 2000 Weapons Delivery

46. The Panel found that on November 22, 2000, an Ilyushin, Tail No. ER75929, leased by Centrafrican Airlines, transported approximately 14 tons of weapons that had been rejected by the Ugandan military, including Slovakian manufactured rifles and machine guns, from Uganda to Liberia in violation of the UN arms embargo. See S/2001/1015 at pp. 39-42 par. 174-188. In reaching this determination, the Panel viewed documentation between the arms broker and the Ugandan military to confirm that the shipment was weapons and that Centrafrican Airlines contracted with the crew to transport this cargo to Liberia. The Panel found that an individual named Sergei Dennisenko signed the contract for delivery on behalf of Centrafrican Airlines. Your affiant believes that this is the same individual that Chichakli listed as an officer when he established San Air's Texas office. See par. 18, *supra*.
47. The Panel then determined that Victor Bout owned Centrafrican Airlines. They located documents signed by Victor Bout as Centrafrican Airlines owner. The Panel also discovered Centrafrican Airlines aircraft sale documents and bank documents signed by Victor Bout. They also determined that Victor Bout had registered the company in the Central African Republic in May 1998. S/2001/1015 at p. 59 par. 272.
48. Based upon documentation the Panel received from the owner of the plane that Centrafrican had leased, the Panel also found that San Air General Trading in Sharjah, UAE insured this

flight and paid the plane's owner for its use. See S/2001/1015 at pp. 39-42 par. 174-188.¹⁸

Because the plane used to deliver the weapons was leased by Centrafrican Airlines and paid for by San Air, the Panel further determined that San Air General Trading and Centrafrican Airlines functioned as one and the same company.

49. Your affiant further notes that San Air General Trading and Centrafrican Airlines appear to share or have shared the same address and postal box in the UAE: P.O. Box 2190, Ajman, UAE.

Weapons Payments to San Air

50. The Panel also identified a source of funds for these payments. S/2001/1015 at p. 88 par. 412. The Panel found that in June and July 2000, the Liberian International Shipping and Corporate Registry ("LISCR"), a US company created to receive maritime funds on behalf of the government of Liberia's maritime registry program that was supposed to remit monies to the Government of Liberia, made two transfers from LISCR's Washington, D.C. BB&T Account No. 5162058071 totaling \$925,000 to San Air General Trading's account No. 02-5712572-01 in Sharjah, UAE. The first payment of \$525K was made on June 15, 2000. The second

¹⁸It appears that Bout's arms trafficking to Liberia continued into 2002. According to the eight-page New York Times Magazine investigative report dated August 17, 2003, titled "Meeting Mr. Bout" by Peter Landesman, Sanjivan Ruprah offered Landesman insight into Bout's arms trafficking techniques. Ruprah reportedly told Bout in June 2002 that Charles Taylor was losing the fight in Liberia's north, and needed an emergency shipment of arms. Ruprah described how Bout quickly offered to fill Taylor's shopping list in exchange for a promise of future business in Liberia. Ruprah claimed that Bout said he had access to false end user certificates which could assist in getting around the UN arms embargo. UN findings support Ruprah's claim. In Panel Report S/2003/498, the UN chronicled a spate of six multi-ton arms flights to Liberia between June and August 2002. The flights originated in Belgrade with false end user certificates and flight plans. The first four flights were flown by Russian aircraft. The last two flights were flown by Ducor World Airlines, an airline based in Oostend, Belgium.

payment of \$400,000 was made on July 7, 2000. Referencing San Air's arms and transportation busting activities documented in the Report, the UN concluded "that these two payments were for arms and transportation in violation of Security Council Resolutions." S/2001/1015 at p. 88 par. 412.

51. The Panel also found that on September 13, 20 and 27, 2000, LISCR paid a total of \$548,000 to a Maritime Affairs bank account in Monrovia for further credit to San Air's bank account in Sharjah, UAE, via the account of Sanjivan Ruprah. S/2001/1015 at p. 88 par. 416.

AIRBAS

52. According to published UN Reports, in 2000, Airbus Transportation, Inc. ("Airbas") was a Bout aviation business in Sharjah, UAE.¹⁹ Victor Lebedev was its manager.
53. Airbas was established in the United States in Richardson, Texas on June 26, 2002. According to the records of the Secretary of the State of Texas, Airbus Transportation Inc. was incorporated by Julia V. Fliagina.²⁰ The address of record was 811 South Central Expressway, Suite 210, Richardson, Texas. Your affiant knows that Julia V. Fliagina is Richard Chichakli's secretary and works for Chichakli at that address.
54. Directors of the corporation were Richard A. Chichakli and Mr. Victor Lebedev. Each listed 811 South Central Expressway, Suite 210, Richardson, Texas as their address of record.

¹⁹Your affiant notes that the entity "Airbas" is variously spelled "Air Bas", "Air Bass" and "Air Bas Transportation, Inc." and "Air Bas Transportation Inc. FZE" and "AirBas Transportation Inc. FZE." The spelling "Airbas" has been adopted in this affidavit.

²⁰In United States Department of Immigration and Customs Enforcement records, your affiant notes that Julia V. Fliagina is also spelled "Ioulia Fliguina."

55. The Panel of Experts on Somalia issued its report on November 4, 2003. S/2003/1035. Johan Peleman was the Chairman of the Panel. The panel had investigated ongoing arms trafficking into Somalia in violation of the existing UN embargo. Among its findings, the Panel took special note of Airbus' suspected involvement in trafficking arms to Somalia, and in doing so, noted the connection between Airbus and Victor and Sergei Bout. S/2003/1035 at p. 25.
56. According to the UN, in May 2002 Viktor Lebedev, the manager of Air Bas in Sharjah, signed a power of attorney for all company transactions to Sergei Bout, who your affiant knows as Victor Bout's brother. Further, the Panel found that payments to Airbus were to be made to Irbis's bank account in Kazakhstan. According to the Panel, Irbis "has been a front for the leasing operations of Viktor Bout's aircraft for years." S/2003/1035 at p. 25.

**AIR BAS AND POTENTIAL VIOLATIONS
OF THE INTERNATIONAL EMERGENCY ECONOMIC POWERS ACT**

57. On May 27, 2004, Victor Lebedev, the general manager, of Airbus Transportation Inc, using address P.O. Box 8299, Sharjah, UAE, signed a fuel purchase agreement with the United States Department of Defense. Lebedev represented that Airbus was "a corporation duly formed, validly existing and in good standing under the laws of Texas, USA." The agreement allows Airbus to purchase fuel for its planes from US military facilities.
58. Because of this agreement, your affiant believes that Airbus is an operating concern that may be generating business.
59. Because of the UN conclusion that payments to Airbus were to be made to Irbis, a Victor Bout front company, your affiant has probable cause to believe that Victor B out is the actual

recipient of any Airbus earnings.

60. As set forth above, because Victor Bout became a designated person on July 22, 2004, any US person who conducted business with him after that date violates IEEPA.

Suspicious Activity Reports

61. Your affiant knows that the Bank of Texas filed a Suspicious Activity Report (No. 20042260001310) regarding a Chichakli attempted July 1, 2004, transfer of \$1,700,000. On that date, Chichakli attempted to wire transfer \$1,700,000 from an account held at the Bank of Texas. Bank personnel refused to send the wire after reviewing internet articles regarding Chichakli. The bank then closed all of Chichakli's accounts.
62. Chichakli's Bank of Texas funds were distributed as follows. As Chichakli's requested, \$25,574.05 was wire transferred from a DHH Enterprises, Inc. account at Bank of Texas to Chichakli's personal bank account, account number 103211810, at Community Credit Union. Chichakli also wire transferred \$75,053.46 from an Airbus Transportation, Inc. account at Bank of Texas to the same personal bank account at Community Credit Union. The registered address for this account is Chichakli's residence, 225 Syracuse, Richardson, Texas.
63. Pursuant to a Federal Grand Jury Subpoena served on both the Bank of Texas and Mashreqbank PSC, New York, records which detail the financial transactions between two Airbus accounts held at each respective bank have been obtained and reviewed. Ten wire transfers totaling \$1,367,000 between May 4, 2004, to December 21, 2004 originated from Mashreqbank PSC, New York, account number 0496306143, titled Airbus Transportation, Inc., to Bank of Texas, account number 289711963, titled Airbus Transportation, Inc. Other notable

outgoing wires from the Airbus account at Mashreqbank PSC, New York, included payments for aircraft engine repairs, overflight navigation charges, contract repair, and transfers to Irbis Airlines. According to the Department of Treasury, as well as various United Nations Security Council Reports discussed herein, Irbis Airlines is a company owned and operated by Victor Bout. Finally, your affiant notes that additional wire transfers for aviation insurance fees were sent to Moscow, Russia. These transfers are consistent with transfers to companies associated with Victor Bout.

64. From a review records of the Defense Energy Support Center, your affiant also knows that Airbus was doing business as Irbis Airlines, under contract with Falcon Air Express, a subcontractor on a Department of Defense contract to deliver small packages to United States military bases in Iraq.
65. In addition to the Bank of Texas's reporting, JP Morgan Chase reported suspicious banking activity occurring between July 2nd and December 13, 2004, totaling \$549,509, involving Richard Chichakli, Airbus Transportation Inc., Transaviation Global Group, Inc, and DHH Enterprises, Inc.
66. Citing the President's July 2004 designation of Victor Bout, JP Morgan noted that Richard Chichakli was listed as president and sole signatory on three JP Morgan checking accounts, Airbus Transportation Inc. account no. 360007441765, Transaviation Global Group, Inc. account no. 360007302765, and a DHH Enterprises Inc. account.
67. Account activity during that time period showed that all three accounts were begun by funds from Bank of America DHH accounts. In September 2004, a check for \$399,509.03 was

drawn on Bank of Texas and payable to Sergey Bout or Galina But was deposited into TransAviation Global's account. In July 2004, a \$50,000 check drawn on Sergey Bout's Bank of Texas account was deposited into Airbus's account. In August 2004, a \$100,000 check drawn on Sergey Bout's Bank of Texas account was deposited in Airbus's account. In addition, two wires totaling \$141,330 were remitted from TransAviation Global's account to Richard Chichakli's account at Fortis Bank in Belgium. A third wire was remitted from TransAviation Global's account to MSIR International Bank in Egypt for the benefit of Richard Chichakli.

68. Your affiant knows that Richard Chichakli has not applied for a license to conduct business with Victor Bout. These recent money movements to and from Sergei Bout cause your affiant to believe that Richard Chichakli may be moving money to Victor Bout through Airbus bank accounts in violation of 50 USC Secs. 1701-1706 (1988).

ARMS TRAFFICKING EXPERT JOHAN PELEMAN

69. During multiple law enforcement interviews in 2004, and again on April 19, 2005, Peleman said that in his expert opinion, Victor Bout and his operation, which included San Air, was one of the central violators of the UN arms embargo on Liberia from 1999-2001.
70. Peleman identified Victor Bout, Serguei Bout, and Richard Chichakli as the leaders of Bout's intricate network. Victor Bout ran the overall network, Sergei Bout ran air operations, and Richard Chichakli masterminded the financial systems. According to Peleman, Chichakli's extensive aviation and financial experience, including establishing Sharjah's Free Trade Zone, made him the "financial mastermind" behind Bout's operation, "not just an accountant, a

mastermind.”

71. In Peleman's expert opinion, Chichakli played a very involved role in devising the plan which allowed Bout to operate behind layers of front companies without detection.
72. Peleman noted the high level media coverage and interest in Victor Bout beginning after Bout's involvement in delivering weapons in Angola and increasing in 2000 with allegations of Bout's sanctions violations in Liberia and Sierra Leone. Peleman observed that in or around 2000, media reports dealing with Bout always involved Chichakli in one way or another. For this reason, combined with Peleman's intimate knowledge of Bout's network and Chichakli's role in it, Peleman believed that Chichakli must have known about Bout's involvement in arms trafficking throughout Africa and the Middle East since at least the late 1990s.
73. Peleman confirmed that the particular weapons deliveries to Liberia in violation of the UN arms embargo (discussed earlier in this affidavit) involving Bout, Chichakli, San Air, and Centrafrian Airlines were among the most significant instances documented and investigated by the UN Panel of Experts on Liberia. Peleman added that the two attempted deliveries of military defense items documented in Report S/2001/1015 also pointed to the involvement of Bout's network. It is noted, however, that Peleman believed that Bout and his network had trafficked in several other weapons shipments to Liberia from 1999-2001 – the UN simply did not catch them.
74. Peleman based this belief in part on his September 2001 interview with Sanjivan Ruprah, an arms trafficker and diamond dealer linked closely to former Liberian dictator Charles Taylor and Victor Bout. At the outset, Ruprah told Peleman that he was meeting Peleman on both

Ruprah's and Bout's account. During this interview, Ruprah told Peleman that he and Bout were the sole suppliers of weapons and military equipment to the Taylor regime from late 1999 to early 2001. Ruprah said that it was a pipeline, with Victor on the sending end and Ruprah on the receiving end in Liberia. Ruprah supported his statement that the UN missed arms flights by showing Peleman several documents. Peleman described these documents as offers and "wish lists" for weapons. Ruprah specifically mentioned that some of the hand-written comments in the margins were that of Liberia's then-President, Charles Taylor.

75. To gauge Ruprah's knowledge and credibility, Peleman mentioned Victor Bout, Serguei Denissenko, Centrafrique Airlines, San Air, and other people and companies in the Bout network to Ruprah during their conversation. Ruprah confirmed all the players involved as Peleman identified them. Peleman concluded that Ruprah was the link between Charles Taylor and Victor Bout.
76. Peleman noted that tracing Bout's network was difficult because it was so complicated and multi-layered, involving subsidiary companies, leased aircraft from other entities, multiple managing directors, various locations, and off-shore companies which masked Bout's direct link to arms trafficking.
77. Peleman stated that one of Chichakli's main roles in the Bout network was to aid in creating this distance between Victor Bout and the actual activities taking place on the ground and in the air. Based on his extensive knowledge of aviation and arms trafficking, Peleman explained that an operation as large as Victor Bout's would need to have archives and layers of sophisticated documentation pertaining to everything from aircraft and company registration

documents to operational paperwork, in part because in the event of a plane crash, the information would be needed to file a claim. Because of Chichakli's position in Bout's organization, Peleman believed Chichakli would have documents such as these within his possession.

ADDITIONAL EVIDENCE CONNECTING CHICHAKLI TO BOUT

78. The facts set forth in the paragraphs above highlight established and proven examples of Victor Bout's and his companies' - including San Air General Trading's - involvement in sanctions busting and arms trafficking to Liberia. These conclusions have been reached after extensive investigation by the UN and U.S. law enforcement. The following evidence further demonstrates your affiant's belief that Richard Chichakli is connected to Victor Bout, possesses an in-depth knowledge of Victor Bout's activities, his companies and their structure, as well as their alleged involvement in arms trafficking. In addition, Chichakli's account of his work with Bout make clear that he was a decision maker and bears, therefore, responsibility for Bout's arms trafficking activities.

Bout's Non-Immigrant Visa Application

79. In Victor Bout's July 9, 2000 Non-Immigrant Visa application to enter the United States, Bout listed the original address Chichakli used to establish San Air, 701 Plano Parkway, Suite 112, Plano, Texas as his destination. This was the address of Chichakli's accounting business. Bout's use of this address is clear proof of his clear connection to Chichakli.

Chichakli Resume

80. At least as of January 2003, Richard Chichakli publicly acknowledged his active managerial

role for Centrafican Airlines and other Bout companies. On a resume downloaded from Chichakli's CPA website txcpa.net in approximately late January 2003, Chichakli listed the following employment, location and position under "Professional Experience:" *"Air Cess/Air Pass/Metavia Airlines/Centrafrican Airlines. Sharjah Free Trade Zone, Sharjah International Airport, UAE[.] Controller/Chief Financial Officer. Leading, directing, staffing, coordinating, controlling, monitoring and evaluating day-to-day financial and accounting operations and customer service. Also monitored share performance, liquidity, and investment funds, and managed revenue generation, billing, and collection activities. Responsible for directing the accounting, financial and reporting activities including budgeting, financial and economics analysis, public reporting, funds management and financial resources development. Responsible for providing the overall supervision of the Corporate Financial Information system, including the acquisition and deployment of the EDP equipment.*

Chichakli and Bout Together in Moscow

81. In 2003, Chichakli accompanied a New York Times Reporter, Peter Landesman, to Moscow so that Landesman could interview Bout. Landesman's published his eight-page investigative report in the New York Times Magazine on dated August 17, 2003. The article was titled "Meeting Mr. Bout." Before the three-day interview began, Chichakli discouraged Landesman from pressing Bout on his connections, suggesting that there were some things that Landesman didn't want to know. Chichakli said "[t]hey'll put you on your knees before they execute you." When Victor and Sergei Bout arrived at the hotel, Chichakli said of Victor, "here is the biggest arms dealer in the world." Chichakli then participated in the interview, later recounting

historical details of Bout's exploits. At one point in the interview, "Chichakli opened his laptop and started a program that chart[ed] the myriad air-traffic control centers a plane is required to contact as it flies through one country's airspace to another's." When Landesman suggested they chart a flight from Oostend Belgium to Monrovia, Liberia, Bout and Chichakli hesitated before "trying to look as if they were struggling, typing in various permutations. Sergei finally gave them the code, ROB, for Roberts International in Monrovia." Your affiant knows that Roberts Field is an airfield Charles Taylor used to receive significant illicit shipments of arms and defense items.

Chichakli/Bout Joint Visa Account

82. Your affiant has probable cause to believe that between April 2002 and at least until May 2003, Richard Chichakli paid for portions of Victor Bout's and Victor Bout's wife's living expenses. In June 2003, Citibank Visa confirmed that Ammar M. Chichakli, 225 Syracuse Place, Richardson, Texas 75081 initiated Citibank Visa account No. 5424-1803-9936-1101. Four cards were issued on that account. Ammar Chichakli was the primary cardholder. Victor Bout, Alla Bout (Victor's wife) and Amal Sabagh were secondary cardholders. Victor and Alla Bout were removed from the account in May 2003. The May 2003 billing statement of \$1,449.30 was paid by DHH Enterprises, 811 South Central Expressway, Suite 210, Richardson, Texas. DHH enterprises is a Chichakli company. Activity on that account included charges in Russia for daily living expenses.
83. From Citibank records relating to this account, your affiant knows that during the period between April 16, 2002 to April 6, 2003, there were an average of 20 charges per month in

Russia, primarily Moscow, but also St. Petersburg, Krasnogorsk, Maikinino, and Oblast. The value of these charges ranged from approximately \$20 to \$1,200. Charges included purchases at restaurants, bars, gas, clothing, book and video stores. Your affiant was not able to determine the purchaser from the information received.

Chichakli/Sergei Bout Connection

84. An April 13, 2005 review of records from the Bank of Texas, N.A., shows that Sergei Bout established a bank account on April 22, 2004 with 3801 14th Street, No. 1906, Plano, Texas as the address of record. Copies of correspondence obtained from Bank of Texas, pursuant to a Federal Grand Jury Subpoena, regarding this account indicate that Chichakli has made inquiries with the Bank of Texas regarding Sergey But's bank account. Specifically, Bank of Texas internal emails which indicate Chichakli was concerned with the Bank of Texas closing Sergey But's bank account.
85. In addition, Sergei Bout bank account application listed his work telephone number as 972.644.9992. An April 13, 2005 check of Southwestern Bell Telephone Company, d.b.a. SBC Inc., disclosed that this number is subscribed to by Chichakli, Hickman, Riggs and Riggs at 811 S. Central Expressway, Suite 210, Richardson, Texas. In addition, on April 15, 2005, your affiant confirmed that "Sergey But" has a current Texas Driver's License issued April 26, 2004, Number 21870360. The photo on the driver's license and the photo on Sergei Bout's Passport appear to be the same individual.
86. On both the bank account and driver's license, 3801 East 14th Street, No. 1906, Plano, Texas, appears as Sergei Bout's address. Chichakli owns this residence.

International Calls

87. Your affiant has reviewed pen and toll information from six telephone numbers associated with Richard Chichakli from July 2002 to the present. The telephone numbers are (1) 972.644.9990; (2) 972.644.9991; (3) 972.644.9992; (4) 972.644.9993; (5) 972.644.9995; (6) 972.690.6936 (residential line); and (7) 972.467.6001 (cellular telephone).²¹
88. While only outgoing call information was captured your affiant has confirmed at least 368 instances where Chichackli numbers made foreign calls. The most common of these international calls were the UAE and Russia. Other country calls included Qatar, Slovak Republic, Turkey, Syria, Lebanon, The Netherlands, Israel, Belgium, France and Germany.
89. International calls were made from Chichakli's residence, 225 Syracuse Place and his business, 811 S. Central Expressway. Regarding the residence, a review of these records shows 111 outgoing international calls from the Chichakli's residence, 225 Syracuse, Richardson, Texas. There were 65 outgoing international calls from Chichakli's cellular telephone. The cellular telephone is subscribed to by Chichakli at 225 Syracuse, Richardson, Texas.
90. This telephone data confirms Chichakli's July 2004 admission to your affiant, discussed below, that he calls Bout every month.

Confidential Informant Information

91. On December 5, 2002, an FBI confidential informant ("C-1") who had personal knowledge of the events C-1 related talked to the FBI. C-1's information has been corroborated to the extent

²¹Your affiant notes that telephones 1 through 5 are business, with phone 1 being the primary number. Phones 2-4 are the rollover numbers. Phone 5 is the office facsimile line. In addition, your affiant notes that the pen register coverage on these telephones was intermittent.

possible and has never been found to be unreliable.

92. C-1 said that Chichakli was arrogant and liked to talk about his association with mobsters. Chichakli claimed that he had previously done business with Russians in Kiev. Chichakli claimed to own numerous planes in South Africa, and conducted business there. Chichakli said that he occasionally does business outside the normal banking world but does not worry about losing money because he has a collection agency that takes care of late payments.
93. On March 5, 2003, C-1 related a conversation C-1 had recently had with Chichakli in Chichakli's office. Chichakli spoke at length about his involvement with Victor Bout. Chichakli logged on to the internet and googled his name. Chichakli then reviewed numerous internet articles chronicling his involvement with Bout. Chichakli did not refute his association with Bout and seemed to be proud of his association with Bout and that it was heavily documented on the internet. Chichakli described being present at Bout's compound in Africa during a raid by masked gunmen. An internet article described Bout being fired upon while in a vehicle with associates. Chichakli claimed that he was one of the associates in the vehicle. In addition, Chichakli claimed that he (Chichakli) conducted business in 51 countries and owned 80 airplanes. Chichakli said that he conducted a lot of business in Africa.
94. On April 5, 2003, C-1 said that Chichakli had recently told C-1 that Victor Bout was Chichakli's partner. Chichakli said that numerous ex-KGB personnel crewed the planes for Chichakli's companies. Chichakli described that in 1998, an airplane Chichakli owned was leased to an airline, "ASWA," in Afghanistan. The plane was carrying munitions when it was forced down in Afghanistan by a Taliban MIG fighter. Prior to landing, the crew contacted

Chichakli and requested instruction on what to do. Chichakli said to land the plane. The crew was captured by the Taliban. Chichakli described ensuing negotiations with the Taliban and Osama (Usama) Bin Laden to free the plane and crew. These negotiations failed, and a successful rescue mission was launched by Chichakli associates.

95. On June 10, 2003, a FBI confidential informant who had personal knowledge of the events related talked to the FBI ("C-2"). C-2's information has been corroborated to the extent possible and has never found to be unreliable. C-2 provided a copy of a demographic search report showing that as of April 2002, Victor and Alla Bout had used 225 Syracuse Place, Richardson, Texas as an address of record.

Chichakli's Admissions to Law Enforcement

96. In December 2003, Chichakli confirmed his deep understanding of Bout's activities. On December 19, 2003, FBI Special Agent Michael Call and IRS Special Agent Ronald A. Loecker interviewed Chichakli at his business, 811 S. Central Expressway, Suite 210, Chichakli regarding an IRS complaint Chichakli had made against an associate. At the conclusion of the interview, Chichakli was told that the investigators had used an internet search engine to background him prior to the interview. Chichakli was told that this check was standard practice.
97. The investigators told Chichakli that in doing so they had learned of his connection to Victor Bout. Chichakli replied "So you want to know about Victor Butt." Chichakli told the agents that he used to work for Bout. Chichakli described him as the "smartest guy in the world" and very "well connected" in Russia. Chichakli described Bout as his "brother" and admitted that

he kept in touch with Bout on a routine basis. Chichakli said that he could call Bout "right now" if the agents wanted to speak with him. The agents declined.

98. Chichakli admitted that he'd first become involved with Bout in 1998 when Bout hired him as a consultant for Bout's purchase of Metavia, an air freight company in South Africa. Bout renamed the company "Air Pass." According to Chichakli, Bout turned to Chichakli because Bout knew that two years earlier Chichakli had successfully established Sharjah, UAE's free trade zone. Chichakli told the agents that he was an expert in air freight trafficking and his skills were instrumental in accomplishing that task. To support his claims, Chichakli produced several magazine articles in Arabic which he claimed catalogued his meetings with UAE representatives during the establishment of the free trade zone.
99. Bout then asked Chichakli to help fix the former Metavia's management and distribution problems. Chichakli said that Bout replaced Metavia's employees with Russian pilots and mechanics. Chichakli said that Michael Harradine stayed with the company. Chichakli said that Bout discussed taking the company public. Chichakli said "[w]hy would a wanted arms trafficker go public with his company if he was a criminal?"
100. Chichakli continued to express his in-depth understanding of Bout's business going back to 1998. Chichakli claimed that Air Pass was quite successful in shipping frozen roses and chickens from South Africa. Bout subsequently changed the name of the company to "Air Cess." According to Chichakli, Air Cess began leasing planes to other airlines, including Norse Air. Chichakli claimed that on April 16, 1998, the South African government claimed that Air Cess had over 200 law violations. Chichakli claimed that the charges were false, but

forced Bout to shut Air Cess's operations down.

101. Chichakli claimed that Bout was innocent of arms trafficking charges. Chichakli claimed that the Belgian warrant for Bout was "bullshit." Chichakli further claimed that Peleman was corrupt and out to get Bout for the benefit of a Bout competitor. Your affiant found no evidence to support these assertions.
102. Chichakli said that the arms trafficking allegations barred him from entering the UAE earlier in 2003. As a result, Chichakli said that Airbus, his aviation service company in the UAE was suffering. Chichakli said that he did not own any planes, adding that his last one had been repossessed in Moldova.
103. Chichakli admitted that his connections to Bout have hurt his accounting business and caused some of his former partners to leave. Chichakli described himself as "just an accountant."
104. Chichakli admitted that press agencies call him for interviews routinely. Chichakli admitted that in early 2003 he went to Russia with Peter Landesman of the NY Times so that Landesman could meet and interview Bout. Chichakli said that the interview was later published in the NY Times. While he denied reading the article, Chichakli claimed that it was full of false allegations. Chichakli said that he had explained to Landesman why it was more profitable to air freight frozen chickens than AK-47s.
105. Chichakli produced a copy of a UN report dated November 4, 2003 which he said was an example of the UN's arms trafficking allegations against him and Bout and provided it to the agents.
106. In July 2004, SA Brady interviewed Chichakli at his business, 811 S. Central Expressway,

Richardson, Texas. During the interview, Chichakli said that he talked to Bout once a month, and that he had last spoken to Bout about one month ago. Chichakli offered to phone Bout right then so the agents could speak with Bout. The agents declined.

107. On September 2, 2004 and February 9, 2005, Chichakli was reinterviewed at his business at 811 S. Central Expressway, Suite 210, Richardson, Texas. During the February 9th interview, Chichakli told IRS SA Loecker that his CPA business was slow, in part because people find CPAs over the internet and anyone searching Chichakli will find articles regarding Chichakli and Victor Bout.
108. On February 25, 2005, Chichakli told SA Loecker that he was no longer Victor Bout's business partner. Chichakli claimed that Bout got out of the business around 2000. Chichakli said that he (Chichakli) is now in business with Victor's brother, Sergei Bout.
109. SA Loecker noted that Chichakli's office contained at least two computers, one with the secretary and one with Chichakli. Because the secretary was able to retrieve a date, a meeting, or a telephone number for Chichakli during SA Loecker's interview, it is believed that these computers contain a daily account of his activities. Chichakli's office was well-organized, had at least two office suites, and a large file storage room. His office contained personal files, including original military records which were produced during the interview, and a large folder containing documents from Chichakli's time as a Commercial Manager in Sharjah's Free Trade Zone.
110. On March 2, 2005, Chichakli was interviewed by telephone. Because SA Loecker has been able to contact Chichakli at his office freely, it is believed that Chichakli spends the majority

of his day there.

ARGUMENT FOR PROBABLE CAUSE

111. As set forth below, I have probable cause to believe that Victor Bout trafficked for profit multi-ton shipments of foreign military defense articles and military weapons from Eastern Europe to various African countries, including Liberia, in violation of well-established UN embargoes on arms trafficking.
112. Specifically, I have probable cause to believe that San Air facilitated these transports on at least two occasions in 2000 and received payment for their services.
113. Richard Chichakli held an executive position in San Air at the time of these shipments.
114. Chichakli was also the Controller/Chief Financial Officer of several Bout-related companies, most notably Centrafrian Airlines, a key violator of the UN Liberia arms embargo during the Taylor regime, and the entity identified by the United Nations as being the same company as San Air.
115. As a Chief Operating Officer, I have probable cause to believe that Chichakli should have seen and retained records of these companies' activities, which may be evidence of crime.
116. In addition to his position in the company, Chichakli's expressed understanding of Bout company history, his admission to being a direct participant in Bout company development, his visits to Bout operations in Africa and his claims of ownership and decision-making to various individuals and to law enforcement demonstrate that he was an active participant in, and had a deep understanding of Bout's operations, before the illicit arms and defense articles shipments to Liberia occurred.

117. Finally, because of the open and notorious nature of Bout's arms trafficking and Bout's close association with Chichakli, I have probable cause to believe that the companies' involvement in Bout's illicit arms trafficking activities were known to Chichakli during the relevant time period.
118. As a US person, Richard Chichakli was obligated to register with the Department of State and request permission before transferring, or facilitating the transfer, of US Munitions List items. I know from an April 2005 check with the Defense Directorate of Trade Control ("DDTC"), the component of the Department of State responsible for tracking and issuing licenses for the lawful trade of US Munitions List and other controlled items, that from at least 1999 to the present, neither Richard Chichakli nor Victor Bout applied for or were registered as a Director of a company that had a license. The DDTC also confirmed that neither San Air General Trading, Airbass, Airbus, Air Cess nor DHH Enterprises applied for or received licenses to lawfully trade US Munitions List or other controlled items.
119. I also have probable cause to believe that Richard Chichakli, either individually or through businesses such as Airbus, directed funds to Victor Bout in violation of IEEPA. Your affiant notes that Richard Chichakli has used deceptive means such as Visa credit cards to provide funds to Bout in the past.
120. As a US person, Richard Chichakli was obligated to obtain the Department of Treasury's permission to do business with Victor Bout after July 22, 2004. I know that none have applied to the Department of Treasury for a license to do business with Victor Bout.
121. Consequently, I have probable cause to believe that Chichakli's assistance of Bout during the

relevant time period violated United States laws against arms trafficking and United States laws against UN sanctions busting. I also have probable cause to believe that Chichakli may have violated US regulations against doing business with denied party.

SEARCH PROTOCOL

Computer Evidence

122. Based upon my knowledge, training and experience, and the experience of other law enforcement personnel, I know that searches and seizures of evidence from computers requires that the computer and its contents be processed later by a qualified computer expert in a laboratory or other controlled environment.
123. Computer storage devices (like hard disks, diskettes, tapes, laser disks, Bernoulli drives, and others) can store the equivalent of thousands of pages of information. Especially when the user wants to conceal criminal evidence, he or she often stores it in random order with deceptive file names. This requires searching authorities to examine all the stored data to determine whether it is included in the warrant. This sorting process can take weeks or months, depending on the volume of data stored, and it would be impractical to attempt this kind of data search on site; and
124. Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert should analyze the system and its data. The search of a computer system is an exacting scientific procedure which is

designed to protect the integrity of the evidence and to recover even "hidden" erased, compressed, password-protected, or encrypted files. Since computer evidence is extremely vulnerable to tampering or destruction (both from external sources or from destructive code imbedded in the system as a "booby trap"), the controlled environment of a laboratory is essential to its complete and accurate analysis.

125. I am aware that the computer hard drives to be searched in addition to contraband may contain materials relating to First Amendment activities such as publishing materials related to the subject's business, which would implicate the protections of the Privacy Protection Act ("PPA"), 42 U.S.C. § 2000aa. I am unable to determine at this time whether publishing materials exist on the hard drives to be searched; however, should it become known that PPA protected materials have been seized *incidentally* because they were commingled with contraband or materials subject to seizure, such materials, when identified on cursory review, will be segregated and not further searched, and copies of the non-PPA protected materials will be retained, and copies of the PPA protected materials will be returned to the owner. Further, files and electronically stored information that do not constitute evidence, contraband, fruits, or instrumentalities of a crime will be segregated and not further searched.

126. Based on my experience as a Special Agent and in discussions with other agents, I am aware that individuals and businesses involved in the above described crimes often maintain documentary records reflecting the receipt of merchandise, shipping manifests, bills of lading, invoices, payment records, receipts, correspondence, ledgers, phone records, client lists, supplier lists, Import & Export (I&E) documents, and other documents relating to the

importation, manipulation, sale, transfer and transshipment of merchandise. In my experience, these records are found in hard copy and sometimes in electronic media formats. These types of documents are usually maintained over a long period of time and are not destroyed because they are necessary either to the maintenance of a legitimate business or because they are necessary documents to legitimize an illicit business. In addition, the absence of such documents at a person's business address is also significant and materially relevant to cases in which importation and exportation of contraband occur. I also believe that there may be now in these location documents and other evidence relating to the violations.

CONCLUSION

127. Based on the above information, I have probable cause to believe that evidence of the above-described AECA, ITAR and IEEPA violations involving Richard Chichakli and the above-described Bout associated companies may be located at (1) 811 S. Central Expressway, Suite 210, Richardson, Texas (the "Office"); (2) 225 Syracuse Place, Richardson, Texas (the "Residence"); and (3) 3801 W. 14th Street #1906, Plano, Texas (the "Condominium").
128. From the above facts, I believe it highly likely that the items sought contain evidence pertinent to the alleged violations of the offenses described in this affidavit. I further believe that to determine the scope and nature of the activity of Richard Chichakli, and his co-conspirators, to identify additional bank accounts being used to hide proceeds of the scheme, and to determine the identity and sources of funds of other possible associates who used the services of Richard Chichakli, and their co-conspirators, it is necessary to seize the items listed in Attachment B. The federal agents will review the material sought by the search warrant and

will segregate any material relating in any way to, including being evidence, fruits, or instrumentalities of violations of the Arms Export Control Act, 22 U.S.C. Sec. 2778 and associated regulations, specifically 22 CFR Part 126.1(c), and the International Emergency Economic Powers Act, 50 USC Secs. 1701-1706 (1988).

REQUEST FOR SEALING ORDER

129. It is respectfully requested that this Court issue an order pursuant to which this application and the supporting affidavit and documents related to the application of the government be filed under seal. The information to be seized is relevant to ongoing investigations. Premature disclosure of the contents of this affidavit and related documents may jeopardize the investigations.

130. Because these investigations are ongoing, and because disclosure of the information in this affidavit could compromise these investigations, it is respectfully requested that this affidavit and the related papers be sealed except for those documents required to properly execute the search warrant.

Therefore, I respectfully request that the attached search warrant be issued authorizing the search and seizure of the items listed in Attachment B. I also respectfully request that this affidavit be sealed.

Matthew A. Baechtle, Special Agent
Department of Homeland Security
Immigration and Customs Enforcement

Seen and sworn to me this
21st day of April, 2005.

/s/ Don D. Bush

DON D. BUSH
UNITED STATES MAGISTRATE JUDGE

EXHIBIT "A" TO THE AFFIDAVIT OF MATTHEW A. BAECHTLE

ENTITIES:

1. ABIDJAN FREIGHT

Abidjan, Ivory Coast.

[SDN]

2. AIR CESS

(a.k.a. AIR CESS EQUATORIAL GUINEA)

(a.k.a. AIR CESS HOLDINGS LTD.)

(a.k.a. AIR CESS LIBERIA)

(a.k.a. AIR CESS RWANDA)

(a.k.a. AIR CESS SWAZILAND (PTY.) LTD.)

(a.k.a. AIR CESS INC. 360-C)

(a.k.a. AIR PAS)

(a.k.a. AIR PASS)

(a.k.a. CESSAVIA)

(a.k.a. CHESS AIR GROUP)

(a.k.a. PIETERSBURG AVIATION SERVICES & SYSTEMS)

Malabo, Equatorial Guinea

P. O. Box 7837, Sharjah, U.A.E.

P. O. Box 3962, Sharjah, U.A.E.

Islamabad, Pakistan

Entebbe, Uganda

[SDN]

3. AIR ZORY LTD.

(a.k.a. AIR ZORI)

(a.k.a. AIR ZORI LTD.)

54 G.M. Dimitrov Blvd., BG-1125, Sofia, Bulgaria

6 Zenas Kanther Str., 1065 Nicosia, Cyprus

[SDN]

4. AIRBAS TRANSPORTATION FZE

(a.k.a. AIR BAS)

(a.k.a. AIR BASS)

(a.k.a. AIRBAS TRANSPORTATION, INC.)

(a.k.a. AVIABAS)

P. O. Box 8299, Sharjah, UAE.

811 S. Central Expwy, Ste 210, Richardson, TX 75080 USA

[SDN]

5. ATC LTD.

Gibraltar, U.K.

[SDN]

6. BUKAVU AVIATION TRANSPORT

Democratic Republic of Congo.

[SDN]

7. BUSINESS AIR SERVICES

Democratic Republic of Congo.

[SDN]

8. CENTRAFRICAN AIRLINES

(a.k.a. CENTRAFRICAIN AIRLINES)

(a.k.a. CENTRAL AFRICAN AIRWAYS)

(a.k.a. CENTRAL AFRICAN AIR)

(a.k.a. CENTRAL AFRICAN AIR LINES)

P. O. Box 2760, Bangui, Central African Republic

c/o Transavia Travel Agency, P. O. Box 3962, Sharjah, UAE

P. O. Box 2190, Ajman, UAE

Kigali, Rwanda

Ras-al-Khaimah, UAE.

[SDN]

9. CENTRAL AFRICA DEVELOPMENT FUND

811 S. Central Expressway, Suite 210, Richardson, Texas,
75081, USA.

P. O. Box 850431, Richardson, Texas 75085

Federal Employer Identification Number: 75-2884986

[SDN]

10. CET AVIATION ENTERPRISE (FZE)

P. O. Box 932 – C20, Ajman, UAE

Equatorial Guinea.

[SDN]

11. CHICHAKLI & ASSOCIATES, PLLC

(a.k.a. CHICHAKLI HICKMAN-RIGGS & RIGGS, PLLC)

(a.k.a. CHICHAKLI HICKMANRIGGS & RIGGS)

811 S. Central Expressway, Suite 210, Richardson, Texas,

75081, USA.

[SDN]

12. CONTINUE PROFESSIONAL EDUCATION, INC.

(a.k.a. GULF MOTOR SALES, INC)

811 S. Central Expressway, Suite 210, Richardson, Texas,

75080, USA.

Federal Employer Identification Number: 08000068-09

[SDN]

13. **DAYTONA POOLS, INC.**

225 Syracuse Place, Richardson, Texas 75081, USA.

[SDN]

14. **DHH ENTERPRISES, INC.**

811 S. Central Expressway, Suite 210, Richardson, Texas,
75080, USA.

[SDN]

15. **GAMBIA NEW MILLENIUM AIR COMPANY**

(a.k.a. GAMBIA NEW MILLENIUM AIR)

(a.k.a. GAMBIA MILLENIUM AIRLINES)

State House, Banjul, Gambia.

[SDN]

16. **IB OF AMERICA HOLDINGS INC.**

811 S. Central Expressway, Suite 210, Richardson, Texas,
75080, USA.

[SDN]

17. **IRBIS AIR COMPANY**

UL Furmanova 65, office 317, Almaty, Khazakhstan 48004

[SDN]

18. **MOLDTRANSVIA SRL**

Aeroport MD-2026, Chisinau, Moldova.

[SDN]

19. **NORDIC LTD.**

(a.k.a. NORDIK LIMITED EOOD)

9 Frederick J. Curie Street, Sofia, Bulgaria 1113.

[SDN]

20. **ODESSA AIR**

(f.k.a. OKAPI AIR)

Entebbe, Uganda.

[SDN]

21. **ORIENT STAR CORPORATION**

(d.b.a. ORIENT STAR AVIATION)

811 S. Central Expressway, Suite 210, Richardson, Texas,
75080, USA.

[SDN]

22. **RICHARD A. CHICHAKLI, P.C.**
811 S. Central Expressway, Suite 210, Richardson, Texas
75080, USA
P. O. Box 850432, Richardson, Texas 75085, USA.
[SDN]
23. **ROCKMAN LTD.**
(a.k.a. ROKMAN EOOD)
9 Frederick J. Curie Street, Sofia, Bulgaria 1113.
[SDN]
24. **SAN AIR GENERAL TRADING FZE**
(a.k.a. SAN AIR GENERAL TRADING, LLC)
P. O. Box 932-20C, Ajman, UAE
P. O. Box 2190, Ajman, UAE
811 S. Central Expwy. Ste 210, Richardson, Texas 75080, USA.
[SDN]
25. **SANTA CRUZ IMPERIAL AIRLINES**
P. O. Box 60315, Dubai, UAE
Sharjah, UAE.
[SDN]
26. **SOUTHBOUND LTD.**
P. O. Box 398, Suite 52 and 553 Monrovia House, 26 Main
Street, Gibraltar.
[SDN]
27. **TRANS AVIATION GLOBAL GROUP INC.**
811 S. Central Expressway, Suite 210, Richardson, Texas,
75080, USA.
[SDN]
28. **TRANSAVIA NETWORK**
(a.k.a. NV TRANS AVIATION NETWORK GROUP)
(a.k.a. TAN GROUP)
(a.k.a. TRANS AVIATION)
(a.k.a. TRANSAVIA TRAVEL AGENCY)
(a.k.a. TRANSAVIA TRAVEL CARGO)
1304 Boorj Building, Bank Street, Sharjah, UAE
P. O. Box 3962, Sharjah, UAE
P. O. Box 2190, Ajman, UAE
Ostende Airport, Belgium.
[SDN]

29. VIAL COMPANY

Delaware, USA.

[SDN]

30. WESTBOUND LTD

P.O. Box 399, 26 Main Street, Gibraltar.

[SDN]

INDIVIDUALS

1. BOUT, SERGEI ANATOLYIEVICH

(a.k.a. SERGEY)

(a.k.a. SERGO)

(a.k.a. SERGI)

(a.k.a. SERGUEI)

(a.k.a. BUT)

(a.k.a. BUTT)

(a.k.a. SERGEY NIKOLAYEVICH BUT)

c/o AIR CESS, Islamabad, Pakistan

c/o AIR CESS, P. O. Box 7837, Sharjah, UAE

c/o AIR ZORY, 54 G. M. Dimitrov Blvd., BG-1125, Sofia, Bulgaria

Moscow, Russia

DOB: 27 Aug 1961; POB: Tajikistan

Citizenship: Russian/Ukrainian

Identification number(s): #76704 (Russian), #CB039314

(Ukrainian)

(individual)[SDN]

2. CHICHAKLI, RICHARD AMMAR

(a.k.a. CHICHAKLI, AMMAR M.)

225 Syracuse Place, Richardson, Texas, 75081, USA

811 South Central Expressway, Suite 210, Richardson, Texas,

75080, USA.

DOB: 29 March 1959; POB: Syria

Citizenship: US

SSN: 405-41-5342 or 467-41-5342

(individual) [SDN]

3. DENISSENKO, SERGUEI

(a.k.a. SERGEI DENISSENKO)

(a.k.a. DENISENKO)

c/o SAN AIR GENERAL TRADING FZE, P. O. Box 932-20C, Ajman, UAE &

P. O. Box 2190, Ajman, UAE

c/o SAN AIR GENERAL TRADING LLC, 811 South Central Expressway, Suite 210,
Richardson, Texas, USA
DOB: 1961
Passport: 500144635 (Russian).
(individual)[SDN]

4. NAYDO, VALERIY

(a.k.a. NAIDO, VALERII)
c/o CET AVIATION, P. O. Box 932 -- 20C, Ajman, UAE
Equatorial Guinea
DOB: 10 Aug 1957
PPN: AC251295, KC024178
Citizenship: Ukrainian
(individual) [SDN]

ATTACHMENT B

ITEMS TO BE SEIZED

135. All records and information relating to violations of the Arms Export Control Act (22 U.S.C. Sec. 2778, et seq.) and International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1705). The term "records" and "information" include all of the below-listed items of evidence in whatever form and by whatever means they may have been created or stored, including any electrical, electronic, or magnetic form (such as any information on an electronic or magnetic storage device, including floppy diskettes, hard disks, ZIP disks, CD-ROMs, optical discs, backup tapes, printer buffers, smart cards, memory calculators, pagers, personal digital assistants such as Palm Pilot computers, as well as printouts or readouts from any magnetic storage device); any handmade form (such as writing, drawing, painting); any mechanical form (such as printing or typing); and any photographic form (such as microfilm, microfiches, prints, slides, negatives, videotapes, motion pictures, photocopies).
136. All files and/or documents pertaining to any relationship between or among the following persons, including their and officers, directors, employees, and agents (including aliases): Richard Chichakli, Victor Bout, Sergei Bout, Sanjivan Ruprah, Julia Fliagina, San Air General Trading FZE, San Air General Trading LLC, Centrafrican Airlines, Air Cess, Irbis, Airbus, Abidjan Freight, Air Pass, Cessavia, Air Charter Service, Air Zory, ATC Ltd, Cet Aviation Enterprise (FZE), Moldtransavia SRL, Nordic Ltd., Odessa Air, Santa Cruz Imperial Airlines, Transavia Network (TAN Group), NV Trans Aviation Network Group, Transaviation, Transavia Travel Agency, Vial Company, Westbound Ltd. and any other person or entity designated by the Department of Treasury, Office of Foreign Assets Control pursuant to Executive Order 13348. (hereinafter referred to as "named parties").
137. All records evidencing the named parties dealings in the air cargo business including, but not limited to: aircraft sale/purchase documentation, aircraft insurance documentation, aircraft registration documents, flight logs, crew manifests, crew briefs, fuel purchasing agreements, re-fueling requests, overflight permission requests, landing/take-off permission requests, payment information for overflights/landing/take-off, clearance codes to overfly country, cargo manifests, hazardous material certificates/documentation, aircraft leasing documentation, invoices/contracts for cargo flights and end user certificates.
138. All documents relating to registration and licensing of any named party with the Department of State, Department of Treasury, or any other U.S. or foreign regulatory authority.
139. All corporate documents for domestic and foreign companies, including articles of

incorporation, shareholder lists, by-laws, minutes of meetings of boards of directors or minutes of meetings of officers of any of the named parties.

140. All bank records for corporate and personal accounts or evidence of monetary transactions that relate to transactions among the named parties (to included monthly statements, canceled checks, deposit tickets, deposited items, debit and credit memos, wire transfer advices, and correspondence).
141. All copies of e-mail transmission and correspondence and documents transmitted through the U.S. mail or by private carrier or by facsimile evidencing contacts among and the relationship among the named parties.
142. All documents, books and records, including accounting records, showing receipt and disposition of funds by the named parties.
143. All contracts, memoranda, letters, notes and other documentation evidencing business or personal dealings between the named parties and foreign businesses and individuals.
144. All address and telephone listings and books, telephone logs and phone bills of the named parties.