

ORIGINAL

15

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

D-1 HADIANTO DJOKO DJULIARSO,
D-2 IBRAHIM BIN AMRAN.

Defendants.

Case: 2:06-cr-20183
Assigned To: Feikens, John
Referral Judge: Whalen, R. Steven
Filed: 04-04-2006 At 04:50 PM
SEALED INDI (2 DFTS) TAM

VIOLATIONS:

18 U.S.C. § 371
18 U.S.C. § 1956
22 U.S.C. § 2778

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this indictment:

1. HADIANTO DJOKO DJULIARSO is a citizen and resident of Indonesia who is an owner and/or associate of the entities Indodial Pte. Ltd, PBJV Global, Eaststar Logistics and Ataru Indonesia, located in and doing business in Indonesia and Singapore.
2. IBRAHIM BIN AMRAN is a citizen and resident of Singapore who is an owner and/or associate of the entities Indodial Pte. Ltd, PBJV Global, Eaststar Logistics and Ataru Indonesia, located in and doing business in Indonesia and Singapore.

3. The export from the United States of arms, weapons, munitions and related military articles and hardware, and the technology to design, build and test such items, is heavily regulated by federal law.
4. The Arms Export Control Act, Title 22, United States Code, Section 2778, and the International Traffic in Arms Regulations, Title 22, Code of Federal Regulations, Section 120 et. seq., authorize the Office of Defense Trade Controls of the United States Department of State to establish and maintain the United States Munitions List, which identifies designated "defense articles" that are subject to export restrictions.
5. Any person who intends to export from the United States defense articles identified on the United States Munitions List must first obtain a license from the Office of Defense Trade Controls of the United States Department of State. Each applicant for an export license from the Office of Defense Trade Controls must truthfully identify in the license application the ultimate and final intended destination of the subject items.
6. Included on the United States Munitions List are articles designed and manufactured for use in military aircraft, including the following items:
 - Brake Rotor, P/N 313010;
 - Receiver Transmitter Assembly, Radar, P/N 703200-1;
 - Track Gate Error & Lock On Detector CCA, P/N 703311-1;
 - Servo Amplifier, P/N 703317-301;

Write Gun Bias, P/N 633525-301;

Direct View Storage Tube (Dust) Yoke & Shield, P/N 633180-351;

Transducer, P/N ES7905-01;

Gyroscope, Rate, P/N 633828-403;

Motor, Torque, Gimbal, Drive, Antenna, P/N 634403-1;

Support, structural, P/N 305-420;

Shroud, Engine Turbine, Insulation, P/N 3-50347-1;

Dual Orifice Nozzle Gasket, P/N 3101682-1.

7. Also included on the United States Munitions List are the following weapons:

Heckler & Koch MP-5 submachine guns;

Heckler & Koch automatic hand guns;

Heckler & Koch sniper rifles.

COUNT ONE

(18 U.S.C. § 371 and 22 U.S.C. §§ 2778(b)(2) and 2778(c) --
Conspiracy to Violate the Arms Export Control Act)

D-1 HADIANTO DJOKO DJULIARSO,
D-2 IBRAHIM BIN AMRAN.

1. The General Allegations are incorporated into this Count by reference.
2. Starting in or about March of 2005, and continuing through in or about April of 2006, in the Eastern District of Michigan, and elsewhere, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN, defendants herein, did knowingly, intentionally and unlawfully agree and conspire with one another and with other persons, both known and unknown to the grand jury, to commit an offense against the United States, that is to export and to cause to be exported from the United States items which were designated as defense articles and had been so designated on the United States Munitions List, without having first obtained from the Department of State a license for such export or written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b) (2) and 2778(c) and Title 22, Code of Federal Regulations, Sections 121.1, 121.4, 123.1, 127.1(a), 127.1(c) and 127.3.

MANNER AND MEANS

3. As part of the conspiracy, and to achieve the aims of the conspiracy, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN purchased and attempted to purchase defense articles, including radar components and weapons, and to illegally

export such items from the United States without the necessary export license or written authorization.

4. As part of the conspiracy, and to achieve the aims of the conspiracy, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN traveled from locations in Indonesia and in Singapore to the Eastern District of Michigan, and elsewhere, to negotiate the purchase and illegal export of defense articles and weapons.
5. As part of the conspiracy, and to achieve the aims of the conspiracy, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN transferred and caused to be transferred funds from locations in Singapore to a bank account maintained in the Eastern District of Michigan in order to pay for the purchase and illegal export of certain defense articles.
6. As part of the conspiracy, and to achieve the aims of the conspiracy, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN used telephones, fax machines and computers to communicate between locations in Indonesia and in Singapore and locations in the Eastern District of Michigan, and elsewhere, to negotiate the purchase and illegal export of defense articles and weapons.

OVERT ACTS

7. In or about March of 2005, an employee of PBJV Global, a company owned and operated by HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN, sent an email to the representative of a company based in the United States seeking to purchase military aircraft parts for export to the country of Indonesia. At the time,

Indonesia was subject to a defense article embargo and the export of such items from the United States to Indonesia was against the law.

8. On or about June 23, 2005, IBRAHIM BIN AMRAN traveled to London, England for the purpose of meeting with one or more representatives of a company based in the United States. During that meeting, AMRAN discussed the purchase and export of military items from the United States to Indonesia, in violation of the then in effect embargo, and without obtaining the necessary export licenses.
9. Also on or about June 23, 2005, IBRAHIM BIN AMRAN stated that the company PBJV Global was a "transshipment" company, and that the true purchaser was the company ATARU Indonesia, which was based in Indonesia and was owned and operated by "John," later identified as HADIANTO DJOKO DJULIARSO.
10. On or about July 6, 2005, IBRAHIM BIN AMRAN sent or caused to be sent a message from Singapore to a company in the United States which included a request for quote for prices on the following aircraft armaments:
 - 120 AIM 9P-2 Sidewinder Missiles;
 - 125 AIM 9P-4 Sidewinder Missiles;
 - 5,000 rounds of Strafing Ammunition.
11. On or about September 12, 2005, IBRAHIM BIN AMRAN sent or caused to be sent from Singapore to the United States a signed written purchase order for export-controlled radar parts for military aircraft (hereafter, the "Radar Parts") totaling \$176,653.67. The purchase order for the Radar Parts included one or more of each

of the following items that were then designated as defense articles on the United States Munitions List:

Brake Rotor, P/N 313010;

Receiver Transmitter Assembly, Radar, P/N 703200-1;

Track Gate Error & Lock On Detector CCA, P/N 703311-1;

Servo Amplifier, P/N 703317-301;

Write Gun Bias, P/N 633525-301;

Direct View Storage Tube (Dust) Yoke & Shield, P/N 633180-351;

Transducer, P/N ES7905-01;

Gyroscope, Rate, P/N 633828-403;

Motor, Torque, Gimbal, Drive, Antenna, P/N 634403-1;

Support, structural, P/N 305-420;

Shroud, Engine Turbine, Insulation, P/N 3-50347-1;

Dual Orifice Nozzle Gasket, P/N 3101682-1.

12. In or about December of 2005, HADIANTO DJOKO DJULIARSO traveled from Indonesia to the Eastern District of Michigan for the purpose of attending a meeting with one or more representatives of a company located in the United States.
13. In or about December of 2005, IBRAHIM BIN AMRAN traveled from Singapore to the Eastern District of Michigan for the purpose of attending a meeting with one or more representatives of a company located in the United States.

14. On or about December 13, 2005, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN attended a meeting at a location in the area of Detroit, Michigan. During that meeting, both DJULIARSO and AMRAN expressed their desire to purchase and to export the Radar Parts, and other defense articles, without the necessary export license or licenses. At one point during the meeting, DJULIARSO endorsed the need to maintain secrecy surrounding the transaction and acknowledged that the purchase and shipping of the Radar Parts and other defense articles without an export license was "criminal."
15. Also on or about December 13, 2005, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN asked the representatives of the company located in the United States to quote prices for four hundred Heckler & Koch MP-5 submachine guns and an undisclosed number of Sig Sauer handguns.
16. On or about December 22, 2005, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN transferred and caused to be transferred from Singapore to a bank account maintained in the Eastern District of Michigan funds in the amount of \$4,025.25 as partial payment for the purchase and export of the Radar Parts.
17. On or about January 5, 2006, IBRAHIM BIN AMRAN sent a message from a location in Singapore to a company based in the United States which included a request for quote for prices on the following weapons: eight hundred and eighty-two (882) Heckler & Koch (H&K) MP-5 submachine guns; eight hundred (800) H&K handguns; and sixteen (16) H&K sniper rifles. After being informed that the subject

weapons were all export controlled, AMRAN confirmed that he wanted to purchase and export the weapons even if a license could not be obtained.

18. On or about February 2, 2006, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN transferred and caused to be transferred from Singapore to a bank account maintained in the Eastern District of Michigan funds in the amount of \$44,143.42 as an additional payment for the purchase and export of the Radar Parts.
19. On or about March 10, 2006, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN sent and caused to be sent an electronic message from Singapore to the United States which included a purchase order for additional quantities of Radar Parts, as well as additional military equipment, with a value of \$393,616.24. As of that date, DJULIARSO and AMRAN had agreed to purchase \$598,783.68 in Radar Parts and other military equipment to be illegally exported from the United States.
20. On or about March 30, 2006, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN transferred and caused to be transferred from Singapore to a bank account maintained in the Eastern District of Michigan funds in the amount of \$99,311.37 as an additional payment for the purchase and export of the Radar Parts and other export controlled military equipment.
21. On or about March 31, 2006, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN transferred and caused to be transferred from Singapore to a bank account maintained in the Eastern District of Michigan funds in the amount of

\$300,000.00 as an additional payment for the purchase and export of the Radar Parts and other export controlled military equipment.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

**(18 U.S.C. §§ 1956(a)(2)(A) and 1956(h)-
Conspiracy to Launder Monetary Instruments)**

D-1 HADIANTO DJOKO DJULIARSO,
D-2 IBRAHIM BIN AMRAN.

1. The General Allegations are incorporated into this Count by reference.
2. Beginning in or about January of 2006, and continuing through in or about April of 2006, in the Eastern District of Michigan, and elsewhere, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN, defendants herein, did knowingly, intentionally and unlawfully agree and conspire with one another and with other persons, both known and unknown to the grand jury, to commit an offense against the United States, that is, the transfer, transportation and transmission of funds to a place in the United States from or through a place outside of the United States with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).
3. As part of that conspiracy, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN, transferred in excess of \$445,000.00 in funds from a place outside the United States to a place in the United States, with the intent to promote the carrying on of specified unlawful activity, that is, the illegal export of defense articles, including radar components and weapons, from the United States without the necessary export license or written authorization, in violation of Title 22, United States Code, Sections 2778(b)(2) and 2778(c).

MANNER AND MEANS

4. As part of the conspiracy, and to achieve the aims of the conspiracy, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN transferred and caused to be transferred funds from locations in Singapore to a bank account maintained in the Eastern District of Michigan in order to pay for the purchase and illegal export of certain defense articles.
5. As part of the conspiracy, on or about December 22, 2005, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN transferred and caused to be transferred from Singapore to a bank account maintained in the Eastern District of Michigan funds in the amount of \$4,025.25 as partial payment for the purchase and export of the Radar Parts.
6. As part of the conspiracy, on or about February 2, 2006, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN transferred and caused to be transferred from Singapore to a bank account maintained in the Eastern District of Michigan funds in the amount of \$44,143.42 as an additional payment for the purchase and export of the Radar Parts.
7. On or about March 30, 2006, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN transferred and caused to be transferred from Singapore to a bank account maintained in the Eastern District of Michigan funds in the amount of \$99,311.37 as an additional payment for the purchase and export of the Radar Parts and other export controlled military equipment.

8. On or about March 31, 2006, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN transferred and caused to be transferred from Singapore to a bank account maintained in the Eastern District of Michigan funds in the amount of \$300,000.00 as an additional payment for the purchase and export of the Radar Parts and other export controlled military equipment.
9. As part of the conspiracy, HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN used telephones, fax machines and computers to communicate between locations in Indonesia and in Singapore and locations in the Eastern District of Michigan, and elsewhere, to arrange for the transfer of funds to promote the carrying on of specified unlawful activity.

All in violation of Title 18, United States Code, Section Sections 1956(a)(2)(A) and 1956(h).

CRIMINAL FORFEITURE ALLEGATIONS
(18 U.S.C. § 982)

1. Upon conviction of the above alleged money laundering offense in violation of Title 18, United States Code, Section 1956, defendants HADIANTO DJOKO DJULIARSO and IBRAHIM BIN AMRAN shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1): any property, real or personal, involved in such offense, or any property traceable to such property.
2. Pursuant to the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b) if, by any act or omission of HADIANTO DJOKO DJULIARSO or IBRAHIM BIN AMRAN , the

above described cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; that defendant shall forfeit any other property up to the value of such unavailable assets, as is set forth in 21 U.S.C. § 853(p).

THIS IS A TRUE BILL

s/GRANDJURY FOREPERSON

Dated: April 4, 2006

STEPHEN J. MURPHY
United States Attorney

s/LYNN A. HELLAND
Assistant United States Attorney
Chief, Special Prosecutions Unit

s/BRUCE C. JUDGE
Assistant United States Attorney

ORIGINAL

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately.

Companion Case Information	Case: 2:06-cr-20183 Assigned To: Feikens, John Referral Judge: Whalen, R. Steven Filed: 04-04-2006 At 04:50 PM SEALED INDI (2 DFTS) TAM
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	AUSA's Initials: <u>BCJ</u>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Case Title: USA v. D-1 Hadianto Djoko Djuliaro and D-2 Ibrahim Bin Amran

County where offense occurred : Wayne

Check One: **Felony** **Misdemeanor** **Petty**

- Indictment with no prior complaint.**
- Indictment ___/Information___ based upon prior complaint [Case number:___]
- Indictment ___/Information___ based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information:


Superseding to Case No: _____ **Judge:** _____

- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

April 4, 2006
Date



BRUCE C. JUDGE, Assistant United States Attorney

313-226-9122

Phone Number

¹ Companion cases are matters in which it appears that substantially similar evidence will be offered at trial or the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.