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CLERK, US DISTRICT COURT
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

November 1984 Grand Jury

UNITED STATES OF AMERICA,) Criminal Case No. 85-0631-N

Plaintiff,)

v.)

SAEID ASEFI INANLOU, (1))
EDGARDO PANGILINAN AGUSTIN, (2))
FRANKLIN PANGILINAN AGUSTIN, (3))
JULIE ROQUE AGUSTIN, (4))
ANTONIO GATDULA RODRIGUEZ, (6))
aka "Tony,")
PRIMITIVO BALUYAT CAYABYAB, (7))
aka "Primo,")
aka "Tibo,")
GEORGE PANGILINAN AGUSTIN, (8))

Defendants.)

I N D I C T M E N T
(Superseding)

Title 18, U.S.C., Sec. 371 - Conspiracy to Defraud the United States; Title 18, U.S.C., Sec. 641 - Theft of Government Property; Title 18, U.S.C., Sec. 2314 - Interstate Transportation of Stolen Property; Title 22, U.S.C., Sec. 2778 - Exportation of Defense Articles; Title 18, U.S.C., Sec. 1001 - False Declarations; Title 18, U.S.C., Sec. 2 - Aiding and Abetting

The grand jury charges:

COUNT 1

INTRODUCTORY ALLEGATIONS

1. In furtherance of world peace and the security and foreign policy of the United States, the President is authorized to control the export of defense articles and to provide foreign policy guidance to persons involved in the export of such articles.

2. The President is authorized to designate those items which shall be considered defense articles and to promulgate regulations for the export of such articles.

1 The items so designated constitute the United States Munitions List. These designated
2 items include military aircraft armaments, among which are fuel controls, optical and
3 guidance controls, aerial cameras and other equipment.

4 3. Decisions on issuing export licenses for items on the United States Munitions
5 List are made in coordination with the Director of the United States Arms Control and
6 Disarmament Agency and take into account the Director's opinion as to whether the
7 export of an article will contribute to an arms race, increase the possibility of outbreak
8 or escalation of conflict or prejudice the development of bilateral or multilateral arms
9 control arrangements.

10 4. The United States Navy utilizes F-14 fighter aircraft, among others, as part
11 of the defense deployment of the United States military. Various armaments of the F-14
12 and other military aircraft are designated as defense articles on the United States
13 Munitions List and therefore require an export license prior to shipment abroad.

14 5. At no time did defendants SAEID ASEFI INANLOU, EDGARDO PANGILINAN
15 AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE ROQUE AGUSTIN, GEORGE
16 PANGILINAN AGUSTIN, ANTONIO GATDULA RODRIGUEZ, aka "Tony," PRIMITIVO
17 BALUYAT CAYABYAB, aka "Primo," aka "Tibo," and coconspirators Pedro Manansala
18 Quito, aka "Pete," Daniel Wheeler and Virginia Wheeler, or any of them, apply for or
19 possess a license to export military aircraft parts from the United States to the United
20 Kingdom or to the Islamic Republic of Iran.

21 6. Military and non-military personnel are prohibited from unlawfully procuring,
22 selling and transshipping aircraft armaments of the United States Navy.

23 THE CONSPIRACY

24 7. Beginning at least as early as January 1981 and continuing until July 1985,
25 within the Southern District of California and elsewhere, the defendants SAEID ASEFI
26 INANLOU, EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN,
27 JULIE ROQUE AGUSTIN, GEORGE PANGILINAN AGUSTIN, ANTONIO GATDULA
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1 RODRIGUEZ, aka "Tony," and PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka
2 "Tibo," did knowingly and willfully combine, conspire, and agree together and with
3 coconspirators Pedro Manansala Quito, Daniel Wheeler and Virginia Wheeler and others,
4 to defraud the United States by stealing and shipping military aircraft equipment, by
5 circumventing procedures designed to control Naval inventories, by frustrating and
6 avoiding procedures promulgated to control exports from this country and by hindering,
7 impeding, impairing, obstructing and defeating the lawful functions of the Department of
8 the Treasury in the collection of revenue, to wit: income taxes.

9 THE METHODS OF THE CONSPIRACY

10 8. As part of the conspiracy, the defendants SAEID ASEFI INANLOU,
11 EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE
12 ROQUE AGUSTIN, GEORGE PANGILINAN AGUSTIN, ANTONIO GATDULA
13 RODRIGUEZ, aka "Tony," PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka "Tibo,"
14 and coconspirators Pedro Manansala Quito, Daniel Wheeler and Virginia Wheeler did
15 unlawfully steal and embezzle United States Naval equipment, Defense Logistic Agency
16 microfiche control indexes and pictures of F-14 combat aircraft.

17 9. As a further part of the conspiracy, the defendant ANTONIO GATDULA
18 RODRIGUEZ, aka "Tony," abused his positions in the United States Navy aboard the
19 helicopter landing ship USS BELLEAU WOOD and the attack aircraft carrier USS KITTY
20 HAWK to penetrate Naval security and unlawfully steal and embezzle military aircraft
21 armaments of the United States Navy.

22 10. As a further part of the conspiracy, the defendant PRIMITIVO BALUYAT
23 CAYABYAB, aka "Primo," aka "Tibo," abused his position as an aviation storekeeper
24 aboard the attack aircraft carrier USS KITTY HAWK to penetrate Naval security and
25 unlawfully steal and embezzle military aircraft armaments of the United States Navy.

26 11. As a further part of the conspiracy, coconspirator Pedro Manansala Quito
27 abused his position as a civilian warehouse worker at the San Diego Naval Fleet Avionics
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1 Logistics Support Center to penetrate Naval security and unlawfully steal and embezzle
2 military aircraft armaments of the United States Navy.

3 12. As a further part of the conspiracy, coconspirator Daniel Wheeler abused his
4 position as a production controller at the Naval Air Rework Facility in Norfolk, Virginia,
5 to penetrate naval security and unlawfully steal and embezzle military aircraft arma-
6 ments of the United States Navy.

7 13. As a further part of the conspiracy, coconspirator Virginia Wheeler abused
8 her position with the Naval Air Rework Facility in Norfolk, Virginia, to penetrate naval
9 security and unlawfully steal and embezzle military aircraft armaments of the United
10 States Navy.

11 14. As a further part of the conspiracy, the defendants SAEID ASEFI INANLOU,
12 EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE
13 ROQUE AGUSTIN, GEORGE PANGILINAN AGUSTIN, ANTONIO GATDULA
14 RODRIGUEZ, aka "Tony," PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka "Tibo,"
15 and coconspirators Pedro Manansala Quito, Daniel Wheeler and Virginia Wheeler stole
16 and embezzled military aircraft armaments of the United States Navy from various
17 United States Naval installations and warships.

18 15. As a further part of the conspiracy, the defendants SAEID ASEFI INANLOU,
19 EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE
20 ROQUE AGUSTIN, and GEORGE PANGILINAN AGUSTIN transshipped stolen military
21 aircraft armaments from San Diego and Los Angeles, California, to New York City and
22 out of the United States using the fictitious companies Pierre Walter, Ltd., and Ward
23 International, which were allegedly located in California.

24 16. As a further part of the conspiracy, the defendants SAEID ASEFI INANLOU,
25 EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE
26 ROQUE AGUSTIN, and GEORGE PANGILINAN AGUSTIN, in order to conceal the illegal
27 transshipment and exportation of military aircraft armaments, falsified Shipper's Export
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1 Declarations, shipping documents, and other records by, among other things, understating
2 the value of the stolen military aircraft armaments and by declaring them to be either
3 "medical supplies," "automobile parts," "electrical parts," or "personal effects."

4 17. As a further part of the conspiracy, the defendants SAEID ASEFI INANLOU,
5 EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE
6 ROQUE AGUSTIN, GEORGE PANGILINAN AGUSTIN, ANTONIO GATDULA
7 RODRIGUEZ, aka "Tony," PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka "Tibo,"
8 and coconspirators Pedro Manansala Quito, Daniel Wheeler and Virginia Wheeler, in order
9 to hide, conceal and disguise their unlawful activity, utilized secret codes and
10 terminology when discussing military aircraft armaments.

11 18. As a further part of the conspiracy, the defendant SAEID ASEFI INANLOU, a
12 citizen of the Islamic Republic of Iran residing in the United Kingdom, utilized his
13 positions with Security Aids International, U.S.A. (SAI USA) and Security Aids Inter-
14 national (SAI) to illegally obtain military aircraft armaments of the United States Navy
15 and to export them to the United Kingdom and the Islamic Republic of Iran.

16 19. As a further part of the conspiracy, SAI and the defendant SAEID ASEFI
17 INANLOU did business as Chandler Trading, aka Chandler, Ltd., aka Chandler, in order
18 to hide, conceal and disguise their unlawful activity.

19 20. As a further part of the conspiracy, the defendants SAEID ASEFI INANLOU,
20 EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE
21 ROQUE AGUSTIN and GEORGE PANGILINAN AGUSTIN utilized Chandler Trading, aka
22 Chandler, Ltd., aka Chandler, and Security Aids International, U.S.A., as conduits for the
23 stolen military aircraft armaments.

24 21. As a further part of the conspiracy, defendants EDGARDO PANGILINAN
25 AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE ROQUE AGUSTIN, GEORGE
26 PANGILINAN AGUSTIN, ANTONIO GATDULA RODRIGUEZ, aka "Tony," PRIMITIVO
27 BALUYAT CAYABYAB, aka "Primo," aka "Tibo," and coconspirators Pedro Manansala
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1 Quito, Daniel Wheeler and Virginia Wheeler failed to keep complete books and records,
2 dealt primarily in currency or cashier's checks, utilized overseas banks and mislabeled
3 commercial transactions in an effort to conceal and disguise their activities and hinder
4 and defeat the lawful functions of the Treasury Department.

5 22. As a further part of the conspiracy, defendants EDGARDO PANGILINAN
6 AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE ROQUE AGUSTIN, ANTONIO
7 GATDULA RODRIGUEZ, aka "Tony," PRIMITIVO BALUYAT CAYABYAB, aka "Primo,"
8 aka "Tibo," and coconspirators Pedro Manansala Quito, Daniel Wheeler and Virginia
9 Wheeler failed to report illicit payments received from the sale of stolen military
10 aircraft armaments on their federal income tax returns.

11 23. As a further part of the conspiracy, the defendants SAEID ASEFI INANLOU,
12 EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE
13 ROQUE AGUSTIN, GEORGE PANGILINAN AGUSTIN, ANTONIO GATDULA
14 RODRIGUEZ, aka "Tony," PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka "Tibo,"
15 and coconspirators Pedro Manansala Quito, Daniel Wheeler and Virginia Wheeler unlaw-
16 fully obtained and exported without a license, military aircraft armaments of a
17 sophisticated nature, including parametric amplifiers used to guide the Phoenix Missile
18 System, gimbal assemblies for inertial navigation systems, gas turbine fuel controls,
19 multi-plex filters, weapon indicator controls, power supplies, an infrared recorder which
20 is a part of the Tactical Air Reconnaissance Pod System ("TARPS"), and signal data and
21 angle of attack computers.

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OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, the following overt acts, among others, were committed within the Southern District of California, and elsewhere:

1. On or about January 28, 1981, in California, defendant FRANKLIN PANGILINAN AGUSTIN transferred \$2,000.00 to defendant ANTONIO GATDULA RODRIGUEZ, aka "Tony," by wire.
2. On or about January 31, 1981, in England, defendant SAEID ASEFI INANLOU received aircraft armaments from defendant EDGARDO PANGILINAN AGUSTIN.
3. On or about April 13, 1982, in California, defendants EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, and JULIE ROQUE AGUSTIN caused the fictitious entity "P. Walter" to ship a 44-pound carton to Chandler Trading, marked "auto parts/truck axle parts."
4. On or about February 7, 1983, defendants EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, and JULIE ROQUE AGUSTIN caused a carton of stolen aircraft armaments to be shipped from Los Angeles, California, to "Chandler Trading" in England, utilizing the fictitious name "Pierre Walter" as consignor.
5. On or about September 19, 1983, defendants EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, and JULIE ROQUE AGUSTIN caused two cartons of stolen aircraft armaments to be shipped from San Diego, California, to "Chandler Trading" in England, utilizing the fictitious name "P. Walter" as consignor.
6. On or about February 2, 1984, in California, defendant EDGARDO PANGILINAN AGUSTIN wrote a check for \$2,000.00 payable to Daniel Wheeler.

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7. On or about February 14, 1984, defendants EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, and JULIE ROQUE AGUSTIN caused a carton of stolen aircraft armaments to be shipped from San Diego, California, to "Chandler, Ltd." in England, utilizing the fictitious name "Pierre Walter, Ltd." as consignor.
8. On or about December 18, 1984, defendants EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, and JULIE ROQUE AGUSTIN caused two cartons of stolen aircraft armaments to be shipped from San Diego, California, to New York City utilizing the fictitious name "Ward International" as consignor.
9. On or about February 5, 1985, in California, defendant FRANKLIN PANGILINAN AGUSTIN purchased a cashier's check for \$2,000.00 payable to defendant PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka "Tibo."
10. On or about February 12, 1985, defendants EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, and JULIE ROQUE AGUSTIN caused a carton of stolen aircraft armaments to be shipped from San Diego, California, to "Chandler, Ltd." in England utilizing the fictitious name "Ward International" as consignor.
11. On or about April 9, 1985, in the Philippines, defendant GEORGE PANGILINAN AGUSTIN had a telephone conversation with defendant FRANKLIN PANGILINAN AGUSTIN.
12. On or about June 24, 1985, in California, defendant FRANKLIN PANGILINAN AGUSTIN purchased a cashier's check for \$3,000.00 payable to coconspirator Pedro Manansala Quito.

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

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COUNTS 2 THROUGH 21

1. Paragraphs 1 through 6 and 8 through 22 of Count 1 and paragraph 2 below are hereby realleged and incorporated by reference in each of Counts 2 through 21 as if set forth in full therein.

2. On or about the dates set forth in Counts 2 through 21 below (Column A), in the Southern District of California and elsewhere, defendants ANTONIO GATDULA RODRIGUEZ, aka "Tony," PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka "Tibo," and coconspirators Pedro Manansala Quito, Daniel Wheeler and Virginia Wheeler did knowingly and willfully steal and embezzle military aircraft armaments of the United States Navy set forth below (Column B) having an approximate value set forth below (Column C) in excess of \$100.00:

<u>COUNT</u>	<u>(A) DATE</u>	<u>(B) U.S. NAVAL AIRCRAFT PART</u>	<u>(C) VALUE</u>
2	January 1981	Two Gimbal assemblies for an inertial navigation system (hereinafter referred to as "Gimbal assemblies"), serial numbers 1-4286 and 400683	\$ 140,000.00
3	September 1981	Three Gimbal assemblies	210,000.00
4	October 10, 1981	Five Gimbal assemblies	350,000.00
5	October 29, 1981	Five Gimbal assemblies	350,000.00
6	November 1981	Four Gimbal assemblies	308,000.00
7	January 1982	Four Gimbal assemblies	308,000.00
8	February 1983	One Gimbal assembly, serial number 401443	77,000.00
9	December 1984	a. One Gimbal assembly, serial number 400628, and b. One Bendix CJ-G8 gas turbine fuel control, serial number 204206	77,000.00 68,000.00

1		(A)	(B)	(C)
2	<u>COUNT</u>	<u>DATE</u>	<u>U.S. NAVAL AIRCRAFT PART</u>	<u>VALUE</u>
3	10	January 1985	a. One Gimbal assembly, serial number 401048, and	\$ 77,000.00
4			b. Two parametric amplifiers for the Phoenix missile system, serial numbers 1010 and 942	54,000.00
5				
6	11	January 1985	One Bendix CJ-G8 gas turbine fuel control, serial number 205194	68,000.00
7	12	February 1985	a. One CJ-G8 gas turbine fuel control, serial number 204221	68,000.00
8			b. Two angle of attack computers, serial numbers LLD003 and LLD001	17,000.00
9			c. One lower wing faring panel, serial number 172902	2,000.00
10				
11	13	April 1985	One infrared recorder, serial number NAV023	383,00.00
12	14	May 1985	a. One servo-mechanism amplifier, serial number 65792, and	6,000.00
13			b. Transmitter liquid, serial number 2958	880.00
14				
15	15	May 1985	One drive constant speed (constant speed transmission), serial number 639	39,000.00
16	16	June 1985	a. One angle of attack computer, serial number HGE005, and	8,500.00
17			b. One power supply, serial number MGF155	4,000.00
18				
19	17	July 1985	a. One Gimbal assembly, serial number 1-4195, and	77,000.00
20			b. One parametric amplifier for the Phoenix missile system, serial number 1044	27,000.00
21				
22	18	July 1985	a. Two signal data computers, serial numbers CSS129 and CV5326	800,000.00
23			b. Four Gimbal assemblies, serial numbers 11-4021, 400273, 401106, and 401414	308,000.00
24			c. One multi-plex filter, serial number EWJ0045	89,000.00
25			d. Two weapon indicator controls, serial numbers CSS034 and GDA010	130,000.00
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<u>COUNT</u>	<u>(A) DATE</u>	<u>(B) U.S. NAVAL AIRCRAFT PART</u>	<u>(C) VALUE</u>
		e. Seven circuit card assemblies, serial numbers 1-4105, 12-0675, 1-4200, 11-4002, 12-1300, 1-4303, and 400087	\$ 22,400.00
		f. One circuit board assembly, serial number L-4450	6,800.00
19	July 1985	a. One film magazine, serial number NAV015, and	13,000.00
		b. One infrared analyzer, serial number NAV014	32,000.00
20	July 1985	One constant speed (constant speed transmission), serial number 1634	39,000.00
21	July 1985	a. One servo-mechanism amplifier, serial number 653133, and	6,000.00
		b. Two seal assemblies	580.00

All in violation of Title 18, United States Code, Sections 641 and 2.

COUNTS 22 THROUGH 37

1. Paragraphs 1 through 6 and 8 through 22 of Count 1 and paragraph 2 below are hereby realleged and incorporated by reference in each of Counts 22 through 37 as if set forth in full therein.

2. On or about the dates set forth in Counts 22 through 37 below (Column A), in the Southern District of California and elsewhere, defendants EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE ROQUE AGUSTIN, and GEORGE PANGILINAN AGUSTIN did knowingly and willfully sell without authority military aircraft armaments of the United States Navy set forth below (Column B) having an approximate value set forth below (Column C) in excess of \$100.00:

COUNT	(A) DATE	(B) U.S. NAVAL AIRCRAFT PART	(C) VALUE
22	January 1981	Two Gimbal assemblies, serial numbers 1-4286 and 400683	\$ 140,000.00
23	September 15, 1981	Three Gimbal assemblies	210,000.00
24	October 10, 1981	Five Gimbal assemblies	350,000.00
25	October 29, 1981	Five Gimbal assemblies	350,000.00
26	November 25, 1981	Four Gimbal assemblies	308,000.00
27	January 29, 1982	Four Gimbal assemblies	308,000.00
28	February 9, 1983	One Gimbal assembly, serial number 401443	77,000.00
29	December 18, 1984	a. One Gimbal assembly, serial number 400628, and b. One Bendix CJ-G8 gas turbine fuel control, serial number 204206	77,000.00 68,000.00
30	January 26, 1985	a. One Gimbal assembly, serial number 401048, and b. Two parametric amplifiers for the Phoenix missile system, serial numbers 1010 and 942	77,000.00 54,000.00

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<u>COUNT</u>	<u>(A) DATE</u>	<u>(B) U.S. NAVAL AIRCRAFT PART</u>	<u>(C) VALUE</u>
31	January 30, 1985	One Bendix CJ-G8 gas turbine fuel control, serial number 205194	\$ 68,000.00
32	February 12, 1985	a. One CJ-G8 gas turbine fuel control, serial number 204221 b. Two angle of attack computers, serial numbers LLD003 and LLD001 c. One lower wing faring panel, serial number 172902	68,000.00 17,000.00 2,000.00
33	May 14, 1985	a. One servo-mechanism amplifier, serial number 65792, and b. Transmitter liquid, serial number 2958	6,000.00 880.00
34	May 23, 1985	One drive constant speed (constant speed transmission), serial number 639	39,000.00
35	June 17, 1985	a. One angle of attack computer, serial number HGE005, and b. One power supply, serial number MGF155	8,500.00 4,000.00
36	July 2, 1985	a. One Gimbal assembly, serial number 1-4195, and b. One parametric amplifier for the Phoenix missile system, serial number 1044	77,000.00 27,000.00
37	July 1985	a. Two signal data computers, serial numbers CSS129 and CV5326 b. Four Gimbal assemblies, serial numbers 11-4021, 400273, 401106, and 401414 c. One multi-plex filter, serial number EWJ0045 d. Two weapon indicator controls, serial numbers CSS034 and GDA010 e. Seven circuit card assemblies, serial numbers 1-4105, 12-0675, 1-4200, 11-4002, 12-1300, 1-4303, and 400087 f. One circuit board assembly, serial number L-4450	800,000.00 308,000.00 89,000.00 130,000.00 22,400.00 6,800.00

All in violation of Title 18, United States Code, Sections 641 and 2.

COUNTS 38 THROUGH 53

1. Paragraphs 1 through 6 and 8 through 22 of Count 1 and paragraph 2 below are hereby realleged and incorporated by reference in each of Counts 38 through 53 as if set forth in full therein.

2. On or about the dates set forth in Counts 38 through 53 below (Column A), in the Southern District of California and elsewhere, defendant SAEID ASEFI INANLOU did knowingly and willfully receive military aircraft armaments of the United States Navy set forth below (Column B) having an approximate value set forth below (Column C) in excess of \$100.00, knowing them to have been stolen:

COUNT	(A) DATE	(B) U.S. NAVAL AIRCRAFT PART	(C) VALUE
38	February 2, 1981	Two Gimbal assemblies for an inertial navigation system (hereinafter referred to as "Gimbal assemblies"), serial numbers 1-4286 and 400683	\$ 140,000.00
39	September 15, 1981	Three Gimbal assemblies	210,000.00
40	October 10, 1981	Five Gimbal assemblies	350,000.00
41	October 29, 1981	Five Gimbal assemblies	350,000.00
42	November 25, 1981	Four Gimbal assemblies	308,000.00
43	January 29, 1982	Four Gimbal assemblies	308,000.00
44	February 9, 1983	One Gimbal assembly, serial number 401443	77,000.00
45	December 18, 1984	a. One Gimbal assembly, serial number 400628, and b. One Bendix CJ-G8 gas turbine fuel control, serial number 204206	77,000.00 68,000.00
46	January 29, 1985	a. One Gimbal assembly, serial number 401048, and b. Two parametric amplifiers for the Phoenix missile system, serial numbers 1010 and 942	77,000.00 54,000.00

1		(A)	(B)	(C)
2	<u>COUNT</u>	<u>DATE</u>	<u>U.S. NAVAL AIRCRAFT PART</u>	<u>VALUE</u>
3	47	January 31, 1985	One Bendix CJ-G8 gas turbine fuel control, serial number 205194	\$ 68,000.00
4	48	February 17, 1985	a. One CJ-G8 gas turbine fuel control, serial number 204221	68,000.00
5			b. Two angle of attack computers, serial numbers LLD003 and LLD001	17,000.00
6			c. One lower wing faring panel, serial number 172902	2,000.00
7	49	May 18, 1985	a. One servo-mechanism amplifier, serial number 65792, and	6,000.00
8			b. Transmitter liquid, serial number 2958	880.00
9	50	May 27, 1985	One drive constant speed (constant speed transmission), serial number 639	39,000.00
10	51	June 20, 1985	a. One angle of attack computer, serial number HGE005, and	8,500.00
11			b. One power supply, serial number MGF155	4,000.00
12	52	July 5, 1985	a. One Gimbal assembly, serial number 1-4195, and	77,000.00
13			b. One parametric amplifier for the Phoenix missile system, serial number 1044	27,000.00
14	53	July 1985	a. Two signal data computers, serial numbers CSS129 and CV5326	800,000.00
15			b. Four Gimbal assemblies, serial numbers 11-4021, 400273, 401106, and 401414	308,000.00
16			c. One multi-plex filter, serial number EWJ0045	89,000.00
17			d. Two weapon indicator controls, serial numbers CSS034 and GDA010	130,000.00
18			e. Seven circuit card assemblies, serial numbers 1-4105, 12-0675, 1-4200, 11-4002, 12-1300, 1-4303, and 400087	22,400.00
19			f. One circuit board assembly, serial number L-4450	6,800.00

25 All in violation of Title 18, United States Code, Sections 641 and 2.

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COUNT 54 AND 55

1. Paragraphs 1 through 6 and 8 through 22 of Count 1 and paragraph 2 below are hereby realleged and incorporated by reference in each of Counts 54 and 55 as if set forth in full therein.

2. On or about the dates set forth in Counts 54 and 56 below (Column A), in the Southern District of California and elsewhere, defendants EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE ROQUE AGUSTIN and GEORGE PANGILINAN AGUSTIN did knowingly and willfully receive military aircraft armaments of the United States Navy set forth below (Column B) having an approximate value set forth below (Column C) in excess of \$100.00, knowing them to have been stolen:

<u>COUNT</u>	<u>(A) DATE</u>	<u>(B) U.S. NAVAL AIRCRAFT PART</u>	<u>(C) VALUE</u>
54	April 1985	One infrared recorder, serial number NAV023	\$ 383,000.00
55	July 1985	a. One film magazine, serial number NAV015 b. One infrared analyzer, serial number NAV014	13,000.00 32,000.00

All in violation of Title 18, United States Code, Sections 641 and 2.

COUNTS 56 THROUGH 70

1. Paragraphs 1 through 6 and 8 through 22 of Count 1 and paragraph 2 below are hereby realleged and incorporated by reference in each of Counts 56 through 70 as if set forth in full therein.

2. On or about the dates set forth in Counts 56 through 70 below (Column A), in the Southern District of California and elsewhere, defendants SAEID ASEFI INANLOU, EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE ROQUE AGUSTIN, GEORGE PANGILINAN AGUSTIN, ANTONIO GATDULA RODRIGUEZ, aka "Tony," PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka "Tibo," and coconspirators Pedro Manansala Quito, Daniel Wheeler and Virginia Wheeler did transport and cause to be transported in interstate commerce military aircraft armaments of the United States Navy set forth below (Column B) having an approximate value set forth below (Column C) in excess of \$5,000.00, knowing them to have been stolen:

<u>COUNT</u>	<u>(A) DATE</u>	<u>(B) U.S. NAVAL AIRCRAFT PART</u>	<u>(C) VALUE</u>
56	January 1981	Two Gimbal assemblies for an inertial navigation system (hereinafter referred to as "Gimbal assemblies"), serial numbers 1-4286 and 400683	\$ 140,000.00
57	September 1981	Three Gimbal assemblies	210,000.00
58	October 10, 1981	Five Gimbal assemblies	350,000.00
59	October 29, 1981	Five Gimbal assemblies	350,000.00
60	November 1981	Four Gimbal assemblies	308,000.00
61	January 1982	Four Gimbal assemblies	308,000.00
62	February 1983	One Gimbal assembly, serial number 401443	77,000.00
63	December 18, 1984	a. One Gimbal assembly, serial number 400628, and b. One Bendix CJ-G8 gas turbine fuel control, serial number 204206	77,000.00 68,000.00

1		(A)	(B)	(C)
2	COUNT	DATE	U.S. NAVAL AIRCRAFT PART	VALUE
3	64	January 26, 1985	a. One Gimbal assembly, serial number 401048, and	\$ 77,000.00
4			b. Two parametric amplifiers for the Phoenix missile system, serial numbers 1010 and 942	54,000.00
5				
6	65	January 30, 1985	One Bendix CJ-G8 gas turbine fuel control, serial number 205194	68,000.00
7	66	February 12, 1985	a. One CJ-G8 gas turbine fuel control, serial number 204221	68,000.00
8			b. Two angle of attack computers, serial numbers LLD003 and LLD001	17,000.00
9			c. One lower wing faring panel, serial number 172902	2,000.00
10				
11	67	May 14, 1985	a. One servo-mechanism amplifier, serial number 65792, and	6,000.00
12			b. Transmitter liquid, serial number 2958	880.00
13	68	May 23, 1985	One drive constant speed (constant speed transmission), serial number 639	39,000.00
14	69	June 17, 1985	a. One angle of attack computer, serial number HGE005, and	8,500.00
15			b. One power supply, serial number MGF155	4,000.00
16				
17	70	July 2, 1985	a. One Gimbal assembly, serial number 1-4195, and	77,000.00
18			b. One parametric amplifier for the Phoenix missile system, serial number 1044	27,000.00
19				
20	71	July 1985	a. Two signal data computers, serial numbers CSS129 and CV5326	800,000.00
21			b. Four Gimbal assemblies, serial numbers 11-4021, 400273, 401106, and 401414	308,000.00
22			c. One multi-plex filter, serial number EWJ0045	89,000.00
23			d. Two weapon indicator controls, serial numbers CSS034 and GDA010	130,000.00
24			e. Seven circuit card assemblies, serial numbers 1-4105, 12-0675, 1-4200, 11-4002, 12-1300, 1-4303, and 400087	22,400.00
25			f. One circuit board assembly, serial number L-4450	6,800.00
26				
27				

28 All in violation of Title 18, United States Code, Sections 2314 and 2.

COUNTS 72 THROUGH 87

1. Paragraphs 1 through 6 and 8 through 22 of Count 1 and paragraph 2 below are hereby realleged and incorporated by reference in each of Counts 72 through 87 as if set forth in full therein.

2. On or about the dates set forth in Counts 72 through 87 below (Column A), in the Southern District of California and elsewhere, defendants SAEID ASEFI INANLOU, EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE ROQUE AGUSTIN, GEORGE PANGILINAN AGUSTIN, ANTONIO GATDULA RODRIGUEZ, aka "Tony," PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka "Tibo," and coconspirators Pedro Manansala Quito, Daniel Wheeler and Virginia Wheeler, without obtaining the required license from the Office of Munitions Control, Department of State, did willfully attempt to export and did export military aircraft armaments set forth below (Column B) which had been designated as defense articles by the President of the United States of America having the approximate value set forth below (Column C):

<u>COUNT</u>	<u>(A) DATE</u>	<u>(B) U.S. NAVAL AIRCRAFT PART</u>	<u>(C) VALUE</u>
72	January 31, 1981	Two Gimbal assemblies, serial numbers 1-4286 and 400683	\$ 140,000.00
73	September 1981	Three Gimbal assemblies	210,000.00
74	October 10, 1981	Five Gimbal assemblies	350,000.00
75	October 29, 1981	Five Gimbal assemblies	350,000.00
76	November 1981	Four Gimbal assemblies	308,000.00
77	January 1982	Four Gimbal assemblies	308,000.00
78	February 1983	One Gimbal assembly, serial number 401443	77,000.00
79	December 18, 1984	a. One Gimbal assembly, serial number 400628, and b. One Bendix CJ-G8 gas turbine fuel control, serial number 204206	77,000.00 68,000.00

1		(A)	(B)	(C)
2	COUNT	DATE	U.S. NAVAL AIRCRAFT PART	VALUE
3	80	January 29, 1985	a. One Gimbal assembly, serial number 401048, and	\$ 77,000.00
4			b. Two parametric amplifiers for the Phoenix missile system, serial numbers 1010 and 942	54,000.00
5	81	January 31, 1985	One Bendix CJ-G8 gas turbine fuel control, serial number 205194	68,000.00
6	82	February 17, 1985	a. One CJ-G8 gas turbine fuel control, serial number 204221	68,000.00
7			b. Two angle of attack computers, serial numbers LLD003 and LLD001	17,000.00
8			c. One lower wing faring panel, serial number 172902	2,000.00
9	83	May 18, 1985	a. One servo-mechanism amplifier, serial number 65792, and	6,000.00
10			b. Transmitter liquid, serial number 2958	880.00
11	84	May 27, 1985	One drive constant speed (constant speed transmission), serial number 639	39,000.00
12	85	June 20, 1985	a. One angle of attack computer, serial number HGE005, and	8,500.00
13			b. One power supply, serial number MGF155	4,000.00
14	86	July 5, 1985	a. One Gimbal assembly, serial number 1-4195, and	77,000.00
15			b. One parametric amplifier for the Phoenix missile system, serial number 1044	27,000.00
16	87	July 1985	a. Two signal data computers, serial numbers CSS129 and CV5326	800,000.00
17			b. Four Gimbal assemblies, serial numbers 11-4021, 400273, 401106, and 401414	308,000.00
18			c. One multi-plex filter, serial number EWJ0045	89,000.00
19			d. Two weapon indicator controls, serial numbers CSS034 and GDA010	130,000.00
20			e. Seven circuit card assemblies, serial numbers 1-4105, 12-0675, 1-4200, 11-4002, 12-1300, 1-4303, and 400087	22,400.00
21			f. One circuit board assembly, serial number L-4450	6,800.00

27 All in violation of Title 22, United States Code, Section 2778, and Title 18, United
28 States Code, Section 2.

COUNT 88

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2 On or about July 19, 1984, in the Southern District of California and elsewhere,
3 defendants SAEID ASEFI INANLOU, EDGARDO PANGILINAN AGUSTIN, FRANKLIN
4 PANGILINAN AGUSTIN, JULIE ROQUE AGUSTIN, GEORGE PANGILINAN AGUSTIN,
5 ANTONIO GATDULA RODRIGUEZ, aka "Tony," and PRIMITIVO BALUYAT CAYABYAB,
6 aka "Primo," aka "Tibo," did knowingly and willfully make false declarations of material
7 fact in a matter within the jurisdiction of the United States Customs Service by stating
8 on a Shipper's Export Declaration ("SED") that the shipment contained auto parts valued
9 at \$1,000.00 and was being exported by P. Walter, Ltd., 101 Broadway, San Diego,
10 California, 92108, knowing the same to have been false when made; in violation of
11 Title 18, United States Code, Sections 1001 and 2.

COUNT 89

On or about October 30, 1984, in the Southern District of California and elsewhere, defendants SAEID ASEFI INANLOU, EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE ROQUE AGUSTIN, GEORGE PANGILINAN AGUSTIN, ANTONIO GATDULA RODRIGUEZ, aka "Tony," and PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka "Tibo," did knowingly and willfully make false declarations of material fact in a matter within the jurisdiction of the United States Customs Service by stating on a Shipper's Export Declaration ("SED") that the shipment contained automotive brake linings valued at \$500.00 and was being exported by Pierre Walter, Ltd., 101 Broadway, San Diego, California 92108, knowing the same to have been false when made; in violation of Title 18, United States Code, Sections 1001 and 2.

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COUNT 90

On or about December 11, 1984, in the Southern District of California and elsewhere, defendants SAEID ASEFI INANLOU, EDGARDO PANGILINAN AGUSTIN, FRANKLIN PANGILINAN AGUSTIN, JULIE ROQUE AGUSTIN, GEORGE PANGILINAN AGUSTIN, ANTONIO GATDULA RODRIGUEZ, aka "Tony," and PRIMITIVO BALUYAT CAYABYAB, aka "Primo," aka "Tibo," did knowingly and willfully make false declarations of material fact in a matter within the jurisdiction of the United States Customs Service by stating on a Shipper's Export Declaration ("SED") that the shipment contained auto parts valued at \$1,200.00 and was being exported by Ward International, Los Angeles, California 90806, knowing the same to have been false when made; in violation of Title 18, United States Code, Sections 1001 and 2.

DATED: March 4, 1986.

A TRUE BILL:

Foreperson

PETER K. NUNEZ
United States Attorney

By: _____
PHILLIP L.B. HALPERN
Assistant U.S. Attorney