Addressing Law Enforcement & Security Challenges in the Maritime Supply Chain to Improve Facilitation of International Maritime Traffic
90% of world trade moves in and out of ports

There is no one system which regulates or polices trade

Sharing information is challenging

Identification of white-collar crime needs global repositories

Addressing white collar crime needs complete transparency and commitment globally
Maritime Trade Finance

Two elements in trade:

- Physical movement of goods
- Financing of goods

Bill of Lading – a legal document
Who loads what & how much
## Clean v Clauaded

<table>
<thead>
<tr>
<th></th>
<th>BsL sent to Bank</th>
<th>Genuine BsL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Coils</td>
<td>Weight (MT)</td>
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<tr>
<td>101</td>
<td>400.606</td>
<td>54</td>
</tr>
<tr>
<td>105</td>
<td>369.759</td>
<td>100</td>
</tr>
<tr>
<td>258</td>
<td>1112.996</td>
<td>246</td>
</tr>
<tr>
<td>214</td>
<td>1275.976</td>
<td>87</td>
</tr>
<tr>
<td>74</td>
<td>425.065</td>
<td>38</td>
</tr>
<tr>
<td>16</td>
<td>67.488</td>
<td>16</td>
</tr>
<tr>
<td>Total</td>
<td>768</td>
<td>3651.881</td>
</tr>
</tbody>
</table>
Sanction evasion - documentation

VSL Lucky Merry
Port Klang to Bangladesh – 75 containers - Bitumen

Containers
Load - Bandar Abbas
T/s - Jebel Ali
T/s - Colombo
Disch - Bangladesh
Sanction evasion – vsl going dark

13 Dec 2022 – vsl goes dark
13 Jan 2023 – vsl AIS shining
Misrepresentation

43 containers rapeseed in bulk

Odessa to Chittagong

Five inspected at DP after weight discrepancy
Nightmare scenarios

800+ BsL from 75+ FIs – concerns over “role of the BL”

Nickel briquettes / copper cathodes

Same cargoes listed on different BL numbers issued by same NVOCC

Carrier asked to amend parties ‘to fit’

Convoluted shipping routes

Same seal numbers voys W-E & E-W
NVOCC Register

Over 95% of false bsLs identified by IMB issued by NVOCCs

Code of Conduct on BL issuance

Encourages accountability of NVOCCs

Increases credibility of BsL issued by them

Promotes sustainable business

A business solution to a business problem
Chartering Experience

Helps facilitate good trade

Identifies those who default and puts them on notice

Helps to resolve charterparty disputes outside of an arbitration
Phantom Ships
Counterfeiting
High yield investment frauds

WITNESS THAT:

Whereas, [redacted] as signatory to this agreement, aggregates the necessary generated funds for the underlying financial transaction and such generated funds are thereby under its control for contract activation and not withdrawal rights and it is ready, willing and able to commit said generated funds to a transaction in conjunction with the client’s funds for the benefit of the client as set out herein; and

Whereas; Client hereby confirms with full legal authority and responsibility that it has the financial resources required to deliver good, clean, clear, unencumbered funds in a total amount of €15,000,000.00 (GBP equivalent) to be transferred to activate a new position with [redacted] through a new account to be opened at the designated transaction bank with the transfer of €15,000,000.00 (GBP equivalent) as set out in this document.

Whereas; YIL confirms that it has made senior financial arrangements through its own Master Bank Contract for the purpose of providing for its clients a reliable, professionally managed and active financial transaction capable of generating the required project emissions set out herein; and

Whereas; said transferred funds are to be held on a non-depletion basis, less bank fees, by the client in their own sub-account under a special services account, solely and specifically set up at the designated holding and transaction bank, for the duration of this agreement and/or any extensions or renewals thereof.
CASE NO: ICC420
DATE: 3/3/2023
ADDRESSED TO: BUYER (Apex Energy Alternative Resources, Inc.) & SELLER (GEORGIAN OIL & GAS CORPORATION)

This Corporate Guarantee is between "Apex Energy Alternative Resources, Inc., Buyer/Assignee, and SELLER "GEORGIAN OIL & GAS CORPORATION; Title holder/Refinery" The International Criminal Court Representative (ICC) will stand in law and perjury in our stable ground to protect non-party parties regarding the ongoing transaction on tank lease payment of $120,000.00 USD (One Hundred and Twenty Thousand United State Dollars) extension for the product (Jet A1) at Rotterdam port.

Should the parties obtain prior written approval to enter into agreement with complete awareness of the gravity of the contract and penalties, all parties shall acknowledge the binding nature of this agreement and the all parties must agree to be solely responsible for the performance heeding to this Agreement without break.

Contract Management

Notwithstanding all the parties' responsibility for total management during the performance of the contract, the International Criminal Court will require maximum coordination between the BUYER, SELLER, and GEORGIAN OIL & GAS CORPORATION

The International Criminal Court Representative (ICC) will be designated on authority of the both parties to monitor all technical aspects and assist in adequate administration of this contract, and as well the closure of the pending transactions.

The types of actions within the purview of the ICC are to assure that the both parties performs the technical requirements of the contract; to performed inspections necessary in connection with the performance of all parties; to maintain both written and oral communications with the both parties concerning the aspects of the written interpretations of the contract agreement requirements; to monitor the Contract performance and notify any deficiencies observed.

Severability

The parties agreed that if any terms or provision of this contract is declared by a court of competent jurisdiction to be illegal or in conflict with any law, the validity of the remaining terms and provisions shall not be affected, and the rights and obligations of the parties shall be construed and enforced in accordance with the terms and agreement stated on the contract.

This agreement constitutes the entire agreement between the parties. No waiver, consent, modification or change of terms of this agreement shall bind either party unless in writing and signed by both parties. Such waiver, consent, modification or change, if made, shall be effective only in the specific instance and for the specific purpose given. There are no understandings, agreements, or a representation, oral or written, not specified herein regarding the contract agreement, by the signatures below of its authorized representative, hereby acknowledges that the Contractor has read this agreement, understands it, and agrees to be bound by its terms and conditions.

Immediately after confirmation of funds, The International Criminal Court will write to the seller as the title holder of both allocation as agreed to schedule a date for Express inspection, and release the six (6) entrance tags for all the allowed delegates and inspection team in another additional eight (8) hours depends on hour quick we receive the
Role in education

Most investigators use ineffective online techniques and do not have the training or skills necessary to effectively find the information they need.

Most Internet users in the investigative community are unaware of the "footprints" they leave on a server every time they visit a website. Most users "don't know what they don't know" about online research and Open Source Intelligence gathering.

Investigators and analysts are increasingly required to use the Internet to find critical information in a variety of circumstances.

This comprehensive training course will teach you how to conduct more effective online information searches, find better information online, and with less cost, with less risk.

Generating relevant, timely and accurate information, assessing and managing associated risks, managing reputation, the Internet has it all - but you need to know where to get it. This comprehensive program will show you how.

For more information and to register for the Internet Intelligence Course visit: www.icc-es.org/io_course

Practical Course on International Trading Problems
28 April 2023, Old Thorns Manor, Hampshire

International trading is highly competitive. Margins have traditionally been small and risks relatively high. The risk/reward equation for the international trader has changed significantly.

To retain profitability it is vital that those involved should be fully aware of the pitfalls confronting them and the means by which they can be avoided.

The course aims to cover these areas.

*** Earn 18 PDU / CPD Points by attending ***

Hosted by ICC International Maritime Bureau
Wrap up

Services provided by the ICC CCS

Preventative

Investigative

Consultative

Unique database – 4 decades of trading history & trends

Maritime Bureau (IMB)
Intelligence Bureau (CIB)
Investigation Bureau (FIB)
ICC FraudNet
Thank you

Cyrus Mody
Deputy Director
ICC International Maritime Bureau

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