

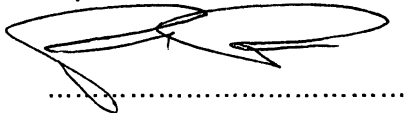
SNF (AUSTRALIA) PTY LTD
Applicant

COMMISSIONER OF TAXATION
Respondent

AFFIDAVIT OF BRIAN C. BECKER

On 23 March 2009, I, Brian C. Becker of 1901 Pennsylvania Avenue NW, Washington, DC 20006, USA, affirm as follows:

1. I am the President and CEO of Precision Economics, LLC, an economic research and consulting firm based in Washington, DC in the United States of America.
2. I refer to my earlier report dated 2 March 2009. On 10 March 2009, I was asked by the Australian Government Solicitor to prepare a supplementary report. I have prepared a supplementary report dated 23 March 2009.
3. Exhibited to this affidavit and marked "BCB-2" is a true copy of my supplementary report.



.....
Brian C. Becker
23 March 2009

DISTRICT OF COLUMBIA) SS: 220-56-4694

On this the 23rd day of March 2009, before me personally appeared Brian C. Becker known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that he executed the same as his free act and deed for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand.




.....
Notary Public
My Commission Expires:

Vivian Jackson
Notary Public, District of Columbia
My Commission Expires 8-14-2010

**IN THE FEDERAL COURT OF AUSTRALIA
VICTORIA DISTRICT REGISTRY**

SNF (AUSTRALIA) PTY LTD

Applicant

COMMISSIONER OF TAXATION

Respondent

CERTIFICATE OF EXHIBIT BCB-2

I certify that the document to which this certificate is attached is the exhibit BCB-2 referred to in the affidavit of Brian C. Becker affirmed on 23 March 2009:



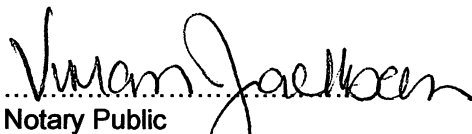
.....
Brian C. Becker

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DISTRICT OF COLUMBIA) SS: 220-56-4694

On this the 23rd day of March 2009, before me personally appeared Brian C. Becker known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that he executed the same as his free act and deed for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand.



.....
Notary Public

My Commission Expires:

Vivian Jackson
Notary Public, District of Columbia
My Commission Expires 8-14-2010



Filed on behalf of the Respondent by:

Australian Government Solicitor
Level 21, 200 Queen Street
Melbourne VIC 3000
DX50 Melbourne
F318883 - 0.3

Contact: Eli Bursky

File ref: 08021392
Telephone: 03 9242 1302
Facsimile: 03 9242 1215
E-mail: eli.bursky@ags.gov.au



PRECISION ECONOMICS, LLC

1901 Pennsylvania Avenue NW, Suite 200

Washington, DC 20006

Tel: 202-530-1113

Fax: 202-530-1144

www.precisionecon.com

Second Statement of Brian C. Becker

In the Federal Court of Australia
Victoria District Registry

Between:

SNF (Australia) PTY Limited, Applicant

The Commissioner of Taxation of the Commonwealth of Australia, Respondent

NO: VID 132 of 2008

23 March 2009

Prepared on instructions of:

Australian Government Solicitor

Second Statement of Brian C. Becker

TABLE OF CONTENTS

	<u>Page</u>
Findings	1
Tables 1-7	
<u>Appendices</u>	
Appendix A: Resume of Brian C. Becker, Ph.D.	
Appendix B: List of Documents Relied Upon	
Appendix C: Instructions from the Australian Government Solicitor	

Second Statement of Brian C. Becker

LIST OF TABLES

- Table 1: Different Potential Levels of the Market in the SNF Supply Chain
- Table 2: SNF AUSTRALIA's Income Statement Per Financial Statements: 1997-2003
- Table 3: Transfer Prices Proposed by Taxpayer Normalized to \$100 Sale Price
- Table 4: Summary of Invoice Review for SECOND BECKER STATEMENT
- Table 5A: Example of the Same Product Being Sold to SNF AUSTRALIA and BETZ AUSTRALIA from SNF FRANCE
- Table 5B: All Transactions Directly Sold to Proposed CUP Companies in Australia or New Zealand from SNF FRANCE and SNF USA
- Table 5C: All Transactions Sold to SNF AUSTRALIA and Designated/Shipped to a Proposed CUP Company
- Table 5D: Proposed CUP Companies' Purchases in Australia or New Zealand
- Table 5E: Sales By SNF Manufacturers to SNF AUSTRALIA and Proposed CUP Companies in Australia
- Table 6: Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia
- Table 7: Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

Second Statement of Brian C. Becker

FINDINGS

A. Assignment and Valuation Issues

1. SPCM SA (formerly known as SNF SA) (“SNF FRANCE”)¹ is the French parent of the multinational chemicals company known as the SNF Floerger Group. SNF operates through a related entity, SNF (Australia) Pty. Ltd. (“SNF AUSTRALIA”) in Australia that has imported and distributed polyacrylamide products since beginning its operations in 1990.²

2. SNF AUSTRALIA purchased most of its product from related parties during the 1997-2003 audit period. SNF AUSTRALIA proposed that it record \$77.6 million for its costs of sales on products principally sourced through the SNF “family”—SNF FRANCE, SNF USA, SNF CHINA, and SNF KOREA.³

3. The taxpayer’s evidence (affidavits) focused on two general areas:

- certain comparisons of SNF’s proposed transfer prices to the polyacrylamide prices paid by unrelated parties (otherwise known as the taxpayer’s “CUP” analysis);⁴ and
- a list of business reasons for the losses SNF AUSTRALIA has proposed over the 1997-2003 period.

4. The Australian Government Solicitor (“AGS”) engaged me in 2008 to economically analyze these transfer prices and the taxpayer’s evidence thereon, among other tasks. On 2 March 2009, I completed that assignment in “Statement of Brian C. Becker” (“FIRST BECKER STATEMENT”). In that statement, I did not find the SNF AUSTRALIA proposed transfer prices to be consistent with arm’s length expectations. Part of that opinion included my

¹ In this report, SNF FRANCE refers generally to the French parent and any other SNF entities located in France, unless otherwise specified. SNF refers to the company when no particular country/entity designation (*e.g.*, French parent, Australian subsidiary, etc.) or when multiple country/entity designations are intended—including the consolidated company.

² In 2003, SNF AUSTRALIA opened its first manufacturing plant, which accounted for a small portion of products sold by SNF AUSTRALIA in that year. Schroeter, Russell H. (11 July 2008). “Affidavit of Russell Henry Schroeter,” pp. 27-28; and Pich, Rene. (22 July 2008). “Affidavit of Pich,” p. 2.

³ Chemtall Corporation and Pearl River Polymers, Inc. represent the two U.S. entities at issue. SNF (China) Flocculant Co. Ltd. is the formal name of SNF CHINA. SNF KOREA’s legal name is Eyang Chemical Co. Ltd.

⁴ My references to the CUP analysis throughout the report are to the taxpayer’s evidence that compares the proposed prices to SNF AUSTRALIA to the prices paid by certain unrelated parties.

observation that the taxpayer provided evidence showing that its proposed CUPs were at a different level of the market from the SNF AUSTRALIA purchases:⁵

- SNF AUSTRALIA Customers: The proposed domestic CUPs provided by the taxpayer evidence that I reviewed through 2 March 2009 were customers to whom *SNF AUSTRALIA* sells its products.⁶ That is, their purchase prices (on these transactions) would be representative of the prices at which SNF AUSTRALIA sells its products, not the arm's length price at which it would be expected to buy its products. See, for example, **Table 5A**. In that sense, it would be difficult for SNF AUSTRALIA to purchase products at the same/similar price at which it intended to resell the same product.
- Direct Ship: The SNF manufacturing entities sold product to unrelated parties in several ways. In some cases, they sold and shipped directly to their customer. However, in other cases, they shipped the product to customers (including proposed CUP companies), but billed SNF AUSTRALIA. While the first case itself provides no direct evidence for (or against) SNF AUSTRALIA being involved in the transaction and/or being at a different level of the market,⁷ the second case clearly places the proposed CUP purchaser at a different level of the market than SNF AUSTRALIA.
- Customer Designation on SNF AUSTRALIA Purchases: SNF AUSTRALIA purchased various products from its related parties with a product name designating one of the former's customers. That is, SNF AUSTRALIA would presumably purchase product from an SNF manufacturer and then resell it to a proposed CUP company in Australia. *These purchases* by such proposed CUP companies would be at a different

⁵ See, for example, Becker, Brian C. (2 March 2009). "Statement of Brian C. Becker," pp. 26-31.

⁶ The foreign proposed CUPs appear to be at a similar level of the market as these domestic proposed CUPs. As such, they would be not only in a different geographic market but also at a different level of the market than the SNF AUSTRALIA purchases. Schroeter, Russell H. (11 July 2008). "Affidavit of Russell Henry Schroeter," Exhibit 18, p. 1.

⁷ The SNF manufacturers sold directly to only one proposed CUP company in Australia. See **Table 5B**. As described later in this statement, SNF AUSTRALIA may have had a role in generating/assisting with its related party making sales to this company in Australia. That is, SNF AUSTRALIA may have had a role in the supply chain that would need to be considered when comparing these proposed CUPs to the sales to SNF AUSTRALIA.

level of the market as the purchases by SNF AUSTRALIA.⁸ In this case, SNF AUSTRALIA's selling price would not be expected to be equivalent to its purchase price, as the former would typically have a premium to incorporate selling costs and profits for SNF AUSTRALIA.⁹

5. On 10 March 2009, the AGS provided me with additional Instructions as part of this engagement related to my opinions in the FIRST BECKER STATEMENT. The additional Instructions requested my explanations/opinions as follows:¹⁰

- 1) Providing a supplementary report which explains the level of the market conclusion in more detail.
- 2) Reporting on my additional examination of the copies of the invoices in my possession.
- 3) Based upon a reasonable sample, testing the correctness of my conclusion that the proposed CUPs were at a different level of the market.

B. Summary of Findings

6. I summarize my findings below. As of the date on the cover of this statement, I have made all the inquiries which I believe are desirable and appropriate and no matters of significance which I regard as relevant have, to my knowledge, been withheld from the Court.¹¹

Instructions Question 1:

Explain the Level of the Market Conclusion in More Detail

7. Much of the FIRST BECKER STATEMENT focused on the appropriateness of the taxpayer's proposed CUPs to be applied as benchmarks for SNF AUSTRALIA's purchases from related parties. The taxpayer's evidence showed the proposed intercompany prices were not

⁸ The proposed CUP purchases presented as evidence do not include purchases from SNF AUSTRALIA, however. Rather, these data provide evidence that the proposed CUP companies had (at least some) operations at a different level of the market than SNF AUSTRALIA.

⁹ At the taxpayer's proposed prices, the average SNF AUSTRALIA resale margin would only be large enough to cover approximately 60 percent of its selling expenses. As such, SNF AUSTRALIA's resales were recorded at a net loss. See **Table 3**.

¹⁰ Appendix C contains the 10 March 2009 Instructions.

¹¹ As part of my consideration for this opinion, I have reviewed the Guidelines for Expert Witnesses in Proceedings in the Federal Court of Australia. I have attempted to follow these guidelines—including the statement above—in drafting this opinion.

inconsistent with (often lower than) the purchase prices of potentially similar products by certain unrelated parties. However, the taxpayer's evidence also included some information that would typically run counter to the profit maximizing behavior of companies at arm's length. That is, SNF AUSTRALIA consistently purchased products at (proposed) prices that were lower than the price it would net upon resale despite significant expansions in the operations over the audit period. See **Tables 2-3**.

8. In addition to comparing SNF AUSTRALIA's losses (and growth/expenses) to similarly situated companies at arm's length, the FIRST BECKER STATEMENT further examined the specific proposed CUP data in the taxpayer evidence. In particular, I found evidence that the proposed CUPs involved different product characteristics, levels of the market, and other characteristics than the corresponding SNF AUSTRALIA purchases. These characteristics and resulting proposed financial statements led to my conclusion in the FIRST BECKER STATEMENT that the CUPs proposed by the taxpayer offered inaccurate/inexact price-to-price benchmarks for the SNF AUSTRALIA purchases.

9. In this statement, I focus only on the level of the market characteristic. Different levels of the market can be seen in a variety of contexts.¹² In perhaps its most clear form, the purchasers simply occupy different places along a consistent supply chain. As seen in **Table 1**, for example, this would have the proposed CUP purchasers at a market level *below* that of SNF AUSTRALIA in the supply chain. That is, these CUP prices proposed by the taxpayer would essentially represent market prices¹³ at which SNF AUSTRALIA would be expected to *sell*, as opposed to the market prices at which it would buy.¹⁴ As described in the FIRST BECKER STATEMENT, market prices at which SNF AUSTRALIA would be expected to *sell* might provide an indirect benchmark for the SNF AUSTRALIA purchase price by reference to an arm's length *resale margin*—but not as a *price-to-price* benchmark.¹⁵

¹² See, for example, Frost & Sullivan. (2007). "Strategic Analysis of Australian Water Treatment Chemicals Market," pp. 5-13 and 5-14.

¹³ SNF AUSTRALIA's sales were to unrelated parties, and thus were subject to market forces.

¹⁴ Across all of the potential CUPs and SNF AUSTRALIA purchases, the comparisons may not be so "clean" as to whether one is above or below another on a particular supply chain. That is, polyacrylamide can be sold into different markets with potentially different supply chains with potentially different pricing along such chains. Similarly, the supply chain may differ for the title of the product and the product itself. Schroeter, Russell H. (14 August 2008). "Affidavit of Russell Henry Schroeter," Electronic Exhibits.

¹⁵ As seen in **Table 2**, SNF AUSTRALIA resold at prices such that it reported a resale margin of approximately 17.1 percent. The FIRST BECKER STATEMENT did not directly assess the arm's length nature of this resale margin, but rather indirectly analyzed its impact on overall profitability. That is, with SNF AUSTRALIA requiring approximately 28.6 percent of sales for selling/operating expenses, the 17.1 percent resale margin would not be wide enough to allow SNF AUSTRALIA to report a positive profit. See **Table 3**.

10. In addition to occupying different positions along the *same* supply chain, different levels of the market can be witnessed across different supply chains and/or different markets. For example, only one of the taxpayer's five identified CUPs purchased products from an SNF manufacturer in Australia (*i.e.*, having a transaction being recorded as a proposed CUP by the taxpayer) during the audit period.¹⁶ The other proposed CUP companies only purchased product (from SNF manufacturers) in other countries with potentially different market conditions and potentially different supply chains that did not involve SNF AUSTRALIA. While the differences in geography among the purchases could potentially be analyzed,¹⁷ the level of the market comparisons for Australian and international transactions would be less exact.

11. The detailed analysis below focuses on the Australia market where: (a) no geographic adjustments are necessary for comparison; and (b) more direct comparison of proposed CUP and SNF AUSTRALIA purchases are most applicable. While most of these sales (more than 98 percent) are to SNF AUSTRALIA—vs. the proposed CUP companies—there exists some overlap of product codes sold in both manners by the SNF manufacturers. That is, as described below, there were 64 proposed CUP purchases and more than 4,700 SNF AUSTRALIA purchases in Australia. See **Tables 5D-5E**.

Instructions Question 2: Additional Invoice Examination Regarding Level of the Market

12. During the course of drafting this statement, I supplemented my review of the invoices in my possession. In preparing the FIRST BECKER STATEMENT, I examined the files that contained copies/summaries of SNF invoices. It is my understanding that those invoices included:

- **Proposed CUPs:** Some of the invoices were for transactions proposed as CUPs by the taxpayer.
- **SNF AUSTRALIA Purchases:** Certain invoices in these files recorded SNF AUSTRALIA purchasing product from a related party.¹⁸

¹⁶ This count includes one transaction to BETZ's parent after it was purchased by one of the other proposed CUP companies (HERCULES) during the audit period. Hercules Inc. (31 March 2003). Form 10-K for Fiscal Year Ended 31 December 2002, pp. 2-3.

¹⁷ Although differences in geographic markets are a characteristic that would potentially impact the reliability of CUPs, its consideration is outside the scope of this statement, as per my Instructions.

¹⁸ It is my understanding that the invoices in my possession do not include all of the proposed CUPs or all proposed SNF AUSTRALIA purchases.

- **Other:** Many of the invoices were not being defined as either proposed CUPs or SNF AUSTRALIA purchases, as they represented sales from an SNF manufacturer to another entity.

13. My analysis of the proposed CUP evidence for the FIRST BECKER STATEMENT included the identification of specific invoice examples¹⁹ of different levels of the market (and/or the other characteristics identified in the FIRST BECKER STATEMENT). That review allowed me to identify and present examples of such level of the market evidence from *transactions in the Australia region*—with: (1) SNF AUSTRALIA as the purchaser on record for products designated for an Australian proposed CUP customer that also purchased directly from an SNF manufacturer; and (2) SNF AUSTRALIA as the purchaser on record for products directly shipped to an unrelated company. However, due to time and access constraints, such analysis did not include:

- A detailed review of each invoice in my possession.
- A formal accounting of the number of SNF manufacturer sales to proposed CUP companies in Australia, the number of SNF manufacturer sales to SNF AUSTRALIA in Australia, or the number of sales to SNF AUSTRALIA that were designated for/shipped to a proposed CUP company in Australia.
- An interview with SNF AUSTRALIA personnel regarding specific invoices, supply chains, and levels of the market.
- A review of any invoices *from* SNF AUSTRALIA to unrelated parties.

14. In this Second Statement, I have supplemented my level of the market conclusions and descriptive examples of certain Australia-area transactions through further review. This supplemental review did not include any interviews or the additional review of any invoices *from* SNF AUSTRALIA. Rather, during the time period between 10 March 2009 and the date on the cover of this statement, I performed additional analysis of the invoices provided, as well as of taxpayer summaries of other invoices that had not been provided.²⁰

¹⁹ I also identified other (non-invoice) evidence on this point in the FIRST BECKER STATEMENT. For example, the evidence did not include any invoices *from* SNF AUSTRALIA, but it did include statements that SNF AUSTRALIA sold to some of the proposed CUP companies. “May Monthly Report,” Fax Transmission from Dennis Crowley to R. Pich. (5 June 2001). p. 3; “October Monthly Report,” Fax Transmission from Dennis Crowley to R. Pich. (13 November 2001). p. 2; and “December Monthly Report,” Fax Transmission from Dennis Crowley to R. Pich. (11 January 2002). p. 2.

²⁰ Karoudjian, David. (22 July 2008). “Affidavit of David Karoudjian,” Exhibits 1 & 5-7; and Schroeter, Russell H. (14 August 2008). “Affidavit of Russell Henry Schroeter,” Electronic Exhibits.

15. In the FIRST BECKER STATEMENT, all of the level of the market examples I identified covered transactions in the Australia area for at least three reasons. First, on non-Australian sales, level of the market differences would have been more difficult to prove (or disprove), as foreign supply chains did not always follow the same path as that of the Australian supply chain.

16. Second, from a more practical perspective with regard to foreign sales, SNF AUSTRALIA would never have been in the supply chain for foreign sales. As such, one could not directly compare SNF AUSTRALIA's position along such supply chain with that of proposed CUP companies.

17. Third, the market conditions may not be the same in Australia as they were in foreign markets. Such market differences potentially reduce comparability when comparing prices in different geographies.

18. Following similar logic to that summarized above from the FIRST BECKER REPORT, I also focused my supplemental review on Australia-area transactions. The quantification of such review is contained in the table below as well as in **Tables 5B-7**.

19. I received from the AGS invoices/invoice summaries on sales from SNF USA and SNF FRANCE. I began my review of the approximately 52,000 pages²¹ of *SNF USA* sales invoices in my possession covering the years 1997-1999 by locating all sales to the Australia-area.²² My first step in the process was to manually locate all of the invoices having the word "Australia" or "New Zealand".

20. I duplicated/checked my full reading review by employing optical character recognition ("OCR") software that converted all of the invoices to formats that were searchable electronically. Both the manual review and the OCR confirmation identified 944 transactions²³ that included either the word Australia or New Zealand. Of these Australia/New Zealand purchases, I located three purchases by SNF AUSTRALIA that were shipped directly to a proposed CUP company. I found an additional 427 SNF ASUTRALIA purchases that were *not* directly shipped to a proposed CUP company. Thus, there exist 430 total invoices from SNF USA to SNF AUSTRALIA over the audit period. See **Table 4** and below.

²¹ I was provided 51,990 pages of SNF USA invoices in relation to the 14 August 2008 Schroeter Affidavit. Some invoices were duplicates, and others were marked "void."

²² My staff supplemented me on the manual review.

²³ A transaction represents the sale of a type of product (*e.g.*, AN 934) from SNF USA to another party. Multiple transactions were present on some invoice pages.

21. Of the remaining 514 sales to Australia, *none* were to proposed CUP companies. That is, SNF USA made 514 sales to other (besides SNF AUSTRALIA and proposed CUP) companies.²⁴

22. As described in Question 3 below, I reviewed each of the SNF AUSTRALIA transactions to determine whether they would provide further examples of the level of the market evidence I presented in the FIRST BECKER STATEMENT. (I intended to review all SNF USA invoices to proposed CUP companies in Australia as well, but no such invoices existed.)

23. Along with the review of the SNF USA invoices, I also reviewed the SNF FRANCE sales information provided in spreadsheet format in the original Karoudjian Affidavit²⁵ —*i.e.*, summary data from invoices. The evidence in my possession included 7,917 transaction summaries from SNF FRANCE.²⁶ As seen below, 4,363 of these transactions involved sales to Australia/New Zealand:

- 45 of these transactions were to SNF AUSTRALIA with product designations for proposed CUP companies;
- 4,254 transactions to SNF AUSTRALIA did *not* have product designations for a proposed CUP company; and
- 64 transactions were sales by SNF FRANCE directly to a proposed CUP company. See **Table 4** and below.

²⁴ This includes sales to non-proposed CUP companies and non-SNF AUSTRALIA subsidiaries of SNF.

²⁵ Karoudjian, David. (22 July 2008). “Affidavit of David Karoudjian,” Exhibits 1 & 5.

²⁶ The evidence before me also included copies of 117 pages of invoices from SNF FRANCE. Karoudjian, David. (22 July 2008). “Affidavit of David Karoudjian,” Exhibits 1 & 5.

Summary of Invoice Review for SECOND BECKER STATEMENT

Description	SNF USA Amount	SNF FRANCE Amount
Pages of Invoices	51,990	--
Invoice Transaction Summaries	--	7,917
All Australia/New Zealand Transactions	944	4,363
SNF AUSTRALIA Transactions		
Australia/New Zealand Transactions to SNF AUSTRALIA Shipped/Designated for Proposed CUP Company	3	45
Australia/New Zealand Transactions to SNF AUSTRALIA Not Shipped/Designated for Proposed CUP Company	427	4,254
Subtotal: Total SNF AUSTRALIA Transactions	430	4,299
Proposed CUP Transactions	0	64
Other Australia/New Zealand Transactions	514	0

24. Thus, the review of the invoice data allowed me to tally the total number of invoices under direct examination. In particular, the SNF manufacturers made 4,729 transactions with SNF AUSTRALIA. For the CUP companies proposed by the taxpayer, the SNF manufacturers only recorded 64 transactions into Australia.

25. **Table 5E** provides additional detail regarding sales into Australia. In particular, there were proposed CUP purchases for six product code groupings over the audit period. SNF AUSTRALIA purchased from more than 60 product code groupings as summarized in **Table 5E**. While this shows only a relatively small overlap of proposed CUPs—with modest proposed CUP volumes—I review/describe these invoices in more detail below with regard to the type of level of the market evidence presented in the FIRST BECKER STATEMENT.²⁷ As detailed in Question 3 below, these data provided additional evidence of the type identified in the FIRST BECKER STATEMENT.

²⁷ Whether such a modest number of transactions and incomplete product/year mapping could serve as a sufficient benchmark for the larger volume of SNF AUSTRALIA purchases is a potential characteristic to consider in determining the reliability/accuracy of a CUP analysis. However, this statement does not analyze this concept, as it is restricted to the consideration of the level of market characteristic.

Instructions Question 3: *Test of Conclusion that Proposed CUPs were at a Different Level of the Market*

26. The FIRST BECKER STATEMENT identified evidence that the proposed CUP companies in Australia were customers of SNF AUSTRALIA, as opposed to being purchasers at the same level of the market as SNF AUSTRALIA. See **Table 5A**. The comprehensive review of invoices I undertook for the drafting of this statement provided additional evidence on this point:

- Three of the five identified proposed CUP companies did not purchase *any* product in Australia at all.²⁸
- Buckman Laboratories (“BUCKMAN”) purchased no product directly from SNF FRANCE or SNF USA, but did have a presence in Australia. There exists evidence of 43 transactions where SNF AUSTRALIA purchased product from SNF FRANCE that was designated for BUCKMAN. In addition, SNF AUSTRALIA also made three transactions with SNF USA for products designated for BUCKMAN. That is, BUCKMAN made all of its 46 Australia transactions with SNF AUSTRALIA—*i.e.*, SNF AUSTRALIA was at a level above BUCKMAN on these transactions.²⁹ See **Tables 5C and 7**.
- The fifth proposed CUP company, Betz Laboratories (“BETZ”), engaged in 64 transactions with SNF FRANCE (no transactions with SNF USA).³⁰ See **Tables 5B, 5E, and 6**. To the degree possible, I evaluate the level of market of such transactions below.
- In addition to its *direct* purchases from SNF FRANCE, BETZ also appeared to gain access to products in Australia using a different supply chain. That is, on two occasions, SNF AUSTRALIA purchased product from SNF FRANCE that were designated for BETZ.³¹ See **Tables 5C**

²⁸ This conclusion, of course, is restricted to the invoices in my possession.

²⁹ These BUCKMAN transactions have not been presented as CUPs for price-to-price comparisons. Only the BUCKMAN non-Australian purchases from SNF manufacturers were presented as CUP transactions in the taxpayer evidence.

³⁰ This count includes one transaction to BETZ’s parent after it was purchased by one of the other proposed CUP companies (Hercules) during the audit period.

³¹ I also located 216 examples of SNF AUSTRALIA purchasing product designated for shipment to other (non-proposed CUP) unrelated parties.

and 6. Thus, on these occasions, the evidence suggests that BETZ was at a different level of the market than SNF AUSTRALIA. To be clear, while some of the BETZ purchases have been presented as CUPs for comparative purposes, these particular data have not been presented as such in the taxpayer evidence.

- Whether the 64 transactions (all BETZ) presented as potential CUPs in Australia would be at a similar level of the market as the SNF AUSTRALIA purchases cannot be evaluated with certainty, but various evidence exists on this point. In particular, SNF AUSTRALIA conducted meetings with BETZ in Australia to potentially make sales.³² While such activity could have potentially been exclusively focused on sales from SNF AUSTRALIA, it is also possible that such meetings led to (and/or assisted with) the 64 potential CUP sales from SNF FRANCE. In that situation, SNF FRANCE would have required less selling effort on its own on sales to BETZ as on sales to SNF AUSTRALIA. With less selling effort, SNF FRANCE would have required lower prices from BETZ than SNF AUSTRALIA—rendering a direct price-to-price comparison of these two transactions inappropriate—*i.e.*, essentially different levels of the market.

27. The detailed review summarized in the bullet points above provided additional information regarding the potential CUPs at issue with regard to their scale, scope and level of the market. Regarding the latter, this review provided additional evidence that the proposed CUPs were not purchasing at the same level of the market as SNF AUSTRALIA in Australia. I was not able to formally confirm such evidence through SNF AUSTRALIA personnel interviews and/or access to any invoices of sales from SNF AUSTRALIA to unrelated parties. Rather, this additional evidence—combined with the other characteristics/consistent losses³³ found in the FIRST BECKER STATEMENT—added strength/confidence to my original opinions. That is, the taxpayer’s CUP approach provided an inaccurate/inexact price-to-price benchmark for SNF AUSTRALIA.

³² Karoudjian, David. (22 July 2008). “Affidavit of David Karoudjian,” Exhibits 1 & 5; May Monthly Report,” Fax Transmission from Dennis Crowley to R. Pich. (5 June 2001). p. 3; and “December Monthly Report,” Fax Transmission from Dennis Crowley to R. Pich. (11 January 2002). p. 2.

³³ Consistent reported losses provides a reality test for level of the market analyses and the appropriateness of CUPs in that arm’s length buyers have the option of not entering into a transaction in which they expect to lose money—as they can opt to do nothing and earn \$0 profit. That is, generally, one characteristic of arm’s length prices is that both parties expect to earn profits. While actual results may differ from expectations, it is not likely that an arm’s length buyer would continue to engage in thousands of transactions over multiple years after consistently finding that it was paying prices consistently above its net resale prices. (The above discussion focused on buyers in the arm’s length transaction, but the analogous discussion can also be made with regard to the seller.)

Second Statement of Brian C. Becker

TABLES

Table 1:

Different Potential Levels of the Market in the SNF Supply Chain

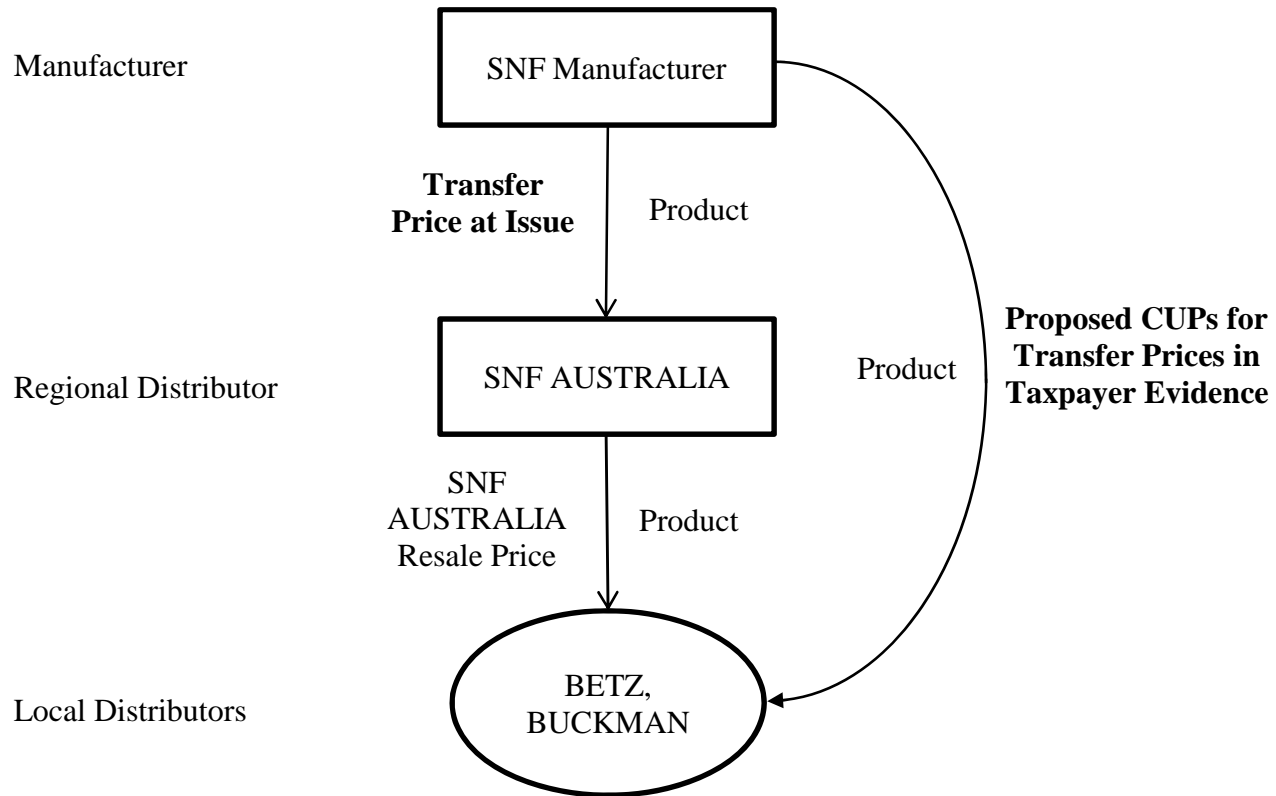


Table 2:**SNF AUSTRALIA's Income Statement Per Financial Statements: 1997-2003**

Period Ending 31 December (000)	1997	1998	1999	2000	2001	2002	2003 /1/	Total	Growth Rate /2/	Formula
Net Sales /2/	\$7,342	\$9,737	\$10,762	\$14,033	\$16,056	\$16,905	\$18,805	\$93,640	19.1%	a
Proposed Transfer Prices /2/	\$6,742	\$7,027	\$8,821	\$9,763	\$13,338	\$12,850	\$14,014	\$72,553		b
Third Party Cost of Sales	-\$255	\$449	\$19	\$1,955	\$104	\$1,332	\$1,452	\$5,055		c
Total Proposed Cost of Sales	\$6,487	\$7,475	\$8,839	\$11,717	\$13,442	\$14,182	\$15,466	\$77,609		d = b+c
Resale (Gross) Profit	\$856	\$2,261	\$1,922	\$2,315	\$2,615	\$2,724	\$3,338	\$16,031		e = a-d
Resale (Gross Margin)	11.7%	23.2%	17.9%	16.5%	16.3%	16.1%	17.8%	17.1%		f = e/a
Selling/Operating Expenses /3/	\$2,874	\$2,691	\$4,151	\$2,681	\$4,012	\$4,762	\$5,581	\$26,753		g
Operating Income	(\$2,018)	(\$430)	(\$2,229)	(\$366)	(\$1,397)	(\$2,038)	(\$2,243)	(\$10,722)		h = e-g
Operating Margin	-27.5%	-4.4%	-20.7%	-2.6%	-8.7%	-12.1%	-11.9%	-11.5%		i = h/a

Notes:

/1/: The total growth rate represents the compounded annual growth rate from 1996-2003.

/2/: As the proposed transfer prices for 2003 were not in the taxpayer's evidence, I estimated these prices using the ratio of proposed transfer prices to total proposed cost of sales in 2002 multiplied by the 2003 total proposed cost of sales.

/3/: For 1997-2003, I do not include: (a) other income in net sales; or (b) interest expenses in selling/operating expenses. Additionally, I did not make adjustments for SNF AUSTRALIA's manufacturing sales and expenses in 2003, as I was provided insufficient information to make this adjustment.

Sources:

- (1) Pich, Rene. (22 July 2008). "Affidavit of Rene Pich," Exhibit 6: SNF (AUSTRALIA) PTY LIMITED. (26 May 1998). "Financial Statements and Reports for the Year Ended 31 December 1997," p. 8.
- (2) Pich, Rene. (22 July 2008). "Affidavit of Rene Pich," Exhibit 7: SNF (AUSTRALIA) PTY LIMITED. (31 December 1998). "Income," Schedule 3.
- (3) Pich, Rene. (22 July 2008). "Affidavit of Rene Pich," Exhibit 8: SNF (AUSTRALIA) PTY LIMITED. (Undated). "Financial Statements and Reports for the Year Ended 31st December 1999."
- (4) Pich, Rene. (22 July 2008). "Affidavit of Rene Pich," Exhibit 9: SNF (AUSTRALIA) PTY LIMITED. (24 April 2001). "Special Purpose Financial Report for the Year Ended 31st December 2000," pp. 16-18.
- (5) Pich, Rene. (22 July 2008). "Affidavit of Rene Pich," Exhibit 10: SNF (AUSTRALIA) PTY LIMITED. (3 May 2002). "Special Purpose Financial Report for the Year Ended 31 December 2001," pp. 5 & 21-23.
- (6) Pich, Rene. (22 July 2008). "Affidavit of Rene Pich," Exhibit 11: SNF (AUSTRALIA) PTY LIMITED. (27 October 2003). "Special Purpose Financial Report for the Year Ended 31 December 2002," pp. 5 & 23-25.
- (7) Pich, Rene. (22 July 2008). "Affidavit of Rene Pich," Exhibit 12: SNF (AUSTRALIA) PTY LIMITED. (19 April 2004). "Special Purpose Financial Report for the Year Ended 31 December 2003," p. 5.

Table 3:**Transfer Prices Proposed by Taxpayer Normalized to \$100 Sale Price**

SNF AUSTRALIA (1997-2003)	Total per SNF AUSTRALIA Income Statement (Million)	Normalized to \$100 Sale Price	Formula	Source
Sales	\$93.64	\$100.00	a	Table 2
Selling/Operating Expenses	\$26.75	\$28.57	b	Table 2
Net Sale Price (After Selling Expense)	\$66.89	\$71.43	c = a-b	Calculation
Proposed Cost of Sales	\$77.61	\$82.88	d	Table 2
Proposed Operating Profit (Loss)	-\$10.72	-\$11.45	e = c-d	Calculation

Table 4:**Summary of Invoice Review for SECOND BECKER STATEMENT**

Description	SNF USA Amount	SNF FRANCE	Total
Pages of Invoices	51,990	--	51,990
Invoice Transaction Summaries	--	7,917	7,917
All Australia/New Zealand Transactions	944	4,363	5,307
SNF AUSTRALIA Transactions			
Australia/New Zealand Transactions to SNF AUSTRALIA Shipped/Designated for Proposed CUP Company	3	45	48
Australia/New Zealand Transactions to SNF AUSTRALIA Not Shipped/Designated for Proposed CUP Company	427	4,254	4,681
Subtotal: Total SNF AUSTRALIA Transactions	430	4,299	4,729
Proposed CUP Transactions	0	64	64
Other Transactions /1/	514	0	514

Note:

/1/: This includes sales to non-proposed CUP companies and non-SNF AUSTRALIA subsidiaries of SNF.

Table 5A:

Example of the Same Product Being Sold to SNF AUSTRALIA and BETZ AUSTRALIA from SNF FRANCE

INVOICE

DELIVERY ADDRESS: SNF AUSTRALIA N.S. WALES
C/-UNITED TRANSPORT SERVICES
CNR GREAT WESTERN HIGHWAY &
DOONSIDE ROAD ARNDELL PARK
NEW SOUTH WALES 2148
AUSTRALIA

FORWARDING AGENT: PETER HODDER & ASSOCIATES
UNIT 4, LEVEL 3, 14 QUEENS ROAD
MELBOURNE 3004 - VICTORIA
CANNAR

CARRIER: CANMAR
ICC2000 CIF SYDNEY
CONTAINER NR CMBU 227 201/8

PAYMENT: BANK TRANSFER
AT RECEIPT

PLA NR: DUB DATE : 20/04/1999
PO 99/02/01

INVOICE NR: 170448
INVOICE DATE: 15/03/1999

CUSTOMER NR: SNF AUST 058
DEPARTURE DATE FROM PLANT: 15/03/1999

SNF AUSTRALIA PTY LTD
UNIT 4, 168 BALCATTA ROAD
BALCATTA, PERTH
WEST AUSTRALIA 6021
AUSTRALIA

Tel: +33 (0)4 77 36 86 00
Fax: +33 (0)4 77 36 86 96
e-mail: info@snf.fr

INVOICE

DELIVERY ADDRESS: BETZ AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

FORWARDING AGENT: R.L. NICHOLSON PTY. LTD.
74 POVEAUX ST.
SURREY HILLS

CARRIER: CANMAR
ICC2000 CIF INGLEBURN DUTY UNPAID
CONTAINER NR CRXU 223 514/7

PAYMENT: BANK TRANSFER
AT 90 DAYS DATE OF B/L
DUE DATE: 07/10/1999

EQ NR: 1495

INVOICE NR: 177132
INVOICE DATE: 28/06/1999

CUSTOMER NR: GE AUSTR 000
DEPARTURE DATE FROM PLANT: 28/06/1999

BETZ AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

Tel: +33 (0)4 77 36 86 00
Fax: +33 (0)4 77 36 86 96
e-mail: info@snf.fr

Customer

Prices: \$2.70 vs. \$2.81 /1/

BETZ designated on product description. /2/

Quantity = 15,000

Freight adjustment would be \$0.23 per kg.

Settlement discount 0.00

NAME OF VESSEL : P&O SYDNEY / 51886/533
ETD : 17/03/99 - ETA : 12/04/99
FOB : 1296,37 AUD - FREIGHT : 2046,54 AUD - INSURANCE : 26,73 AUD

GOODS OF FRENCH ORIGIN			
	N.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight :	15000.00 KG		
Gross weight :	15600.00 KG		
20 BOX PALLETS			
	AUD 40500.00	0.00	AUD 40500.00

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 20.60 %

Bank : CREDIT LYONNAIS ST ETIENNE CAE
FR65 3000 2037 2000 0006 1997 E63
SWIFT : CRLYFRFP

INVOICE 170448 CUSTOMER SNF AUST UTI

Settlement discount 0.00

NAME OF VESSEL : PONEZ JAKARTA
ETD : 08/07/1999 ETA : 08/08/1999

GOODS OF FRENCH ORIGIN			
	N.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight :	15000.00 KG		
Gross weight :	15600.00 KG		
20 PALLETS			
	AUD 45583.00	0.00	AUD 45583.00

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 20.60 %

Bank : CREDIT LYONNAIS ST ETIENNE CAE
FR65 3000 2037 2000 0006 1997 E63
SWIFT : CRLYFRFP

INVOICE 177132 CUSTOMER GE AUSTR UTQ

Notes:

- /1/: Freight and payment terms differ between the two invoices. The longer payment terms for BETZ would increase its price. BETZ's price does not include freight charges.
- /2/: The BETZ designation suggests that the products sold from SNF FRANCE to SNF AUSTRALIA will then be sold by SNF AUSTRALIA to BETZ.

Sources:

- (1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," p. 6.
- (2) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 6.

Table 5B:

All Transactions Directly Sold to Proposed CUP Companies in Australia or New Zealand
from SNF FRANCE and SNF USA

#	Sold to /1/	SNF Product Code	Year
SNF FRANCE Direct Sale to Proposed CUP Company			
1	GE BETZ	FO 4190 BETZ	1997
2	GE BETZ	FO 4190 BETZ	1998
3	GE BETZ	FO 4190 BETZ	1998
4	GE BETZ	AN 934 TBF2 BETZ	1999
5	GE BETZ	AN 945 SH	1999
6	GE BETZ	AN 934 TBF2 BETZ	1999
7	GE BETZ	FO 4190 BETZ	1999
8	GE BETZ	AN 934 TBF2 BETZ	2000
9	GE BETZ	AN 934 TBF2 BETZ	2000
10	GE BETZ	AN 934 PG2 BETZ	2000
11	GE BETZ	AN 934 PG2 BETZ	2000
12	GE BETZ	AN 934 PG2 BETZ	2000
13	GE BETZ	AN 934 PG2 BETZ	2000
14	GE BETZ	FO 4190 BETZ	2000
15	GE BETZ	FO 4190 BETZ	2000
16	GE BETZ	FO 4190 BETZ	2000
17	GE BETZ	FO 4190 BETZ	2000
18	GE BETZ	(WAITING TIME)	2001
19	GE BETZ	INCONNU	2001
20	GE BETZ	AN 934 PG2 BETZ	2001
21	GE BETZ	AN 934 PG2 BETZ	2001
22	GE BETZ	AN 945 SH	2001
23	GE BETZ	FO 4190 BETZ	2001
24	GE BETZ	BASE WS 72 - 40%	2002
25	GE BETZ	AN 934 PG2 NWS BETZ	2002
26	GE BETZ	AN 945 SH	2002
27	GE BETZ	AN 934 PG2 NWS BETZ	2002
28	GE BETZ	AN 934 PG2 NWS BETZ	2002
29	GE BETZ	AN 945 SH	2002
30	GE BETZ	AN 934 PG2 NWS BETZ	2002
31	GE BETZ	AN 945 SH	2002
32	GE BETZ	AN 945 SH	2002
33	GE BETZ	AN 934 PG2 NWS BETZ	2002
34	GE BETZ	AN 945 SH	2002
35	GE BETZ	AN 934 PG2 NWS BETZ	2002
36	GE BETZ	AN 945 SH	2002
37	GE BETZ	FO 4190 BETZ	2002
38	GE BETZ	FO 4190 PG2 NWS BETZ	2002
39	GE BETZ	FO 4190 PG2 NWS BETZ	2002
40	GE BETZ	FO 4190 PG2 NWS BETZ	2002
41	GE BETZ	FO 4190 PG2 NWS BETZ	2002
42	GE BETZ	FO 4190 PG2 NWS BETZ	2002
43	GE BETZ	FO 4190 PG2 NWS BETZ	2002
44	GE BETZ	AN 934 PG2 NWS BETZ	2003
45	GE BETZ	AN 910 PWG BETZ	2003
46	GE BETZ	AN 945 SH BETZ	2003
47	GE BETZ	AN 910 PWG BETZ	2003
48	GE BETZ	AN 934 PG2 NWS BETZ	2003
49	GE BETZ	AN 934 PG2 NWS BETZ	2003
50	GE BETZ	AN 945 SH BETZ	2003
51	GE BETZ	AN 934 PG2 NWS BETZ	2003
52	GE BETZ	AN 945 SH BETZ	2003
53	GE BETZ	AN 934 PG2 NWS BETZ	2003
54	GE BETZ	AN 934 PG2 NWS BETZ	2003
55	GE BETZ	AN 934 PG2 NWS BETZ	2003
56	GE BETZ	FO 4190 PG2 NWS BETZ	2003
57	GE BETZ	FO 4190 PG2 NWS BETZ	2003
58	GE BETZ	FO 4190 PG2 NWS BETZ	2003
59	GE BETZ	FO 4350 SH	2003
60	GE BETZ	FO 4190 PG2 NWS BETZ	2003
61	GE BETZ	FO 4190 PG2 NWS BETZ	2003
62	GE BETZ	SAMPLES	2003
63	GE BETZ	SAMPLES	2003
64	GE BETZ	SAMPLES	2003

SNF USA Direct Sale to Proposed CUP Company

No Transactions

Note:

/1/: I have shown the "Groupe" designation from the Karoudjian Affidavit analysis, which appears to be the sold to party of the transaction. A "Client" field is also provided by the Karoudjian Affidavit with either "GE AUSTR" or "BETZ AUS" designated for these transactions.

Sources:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 5C:

All Transactions Sold to SNF AUSTRALIA and Designated/Shipped to a Proposed CUP Company

#	Sold to	Designated/Shipped to	SNF Product Code	Year
SNF FRANCE to SNF AUSTRALIA Transactions				
1	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SH BUCKMAN	1997
2	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SC BUCKMAN	1997
3	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SH BUCKMAN	1997
4	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SC BUCKMAN	1998
5	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SC BUCKMAN	1998
6	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SC BUCKMAN	1998
7	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SC BUCKMAN	1998
8	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SC BUCKMAN	1998
9	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SC BUCKMAN	1998
10	SNF AUSTRALIA	SNF AUSTRALIA	AN 934 TBF2 BETZ	1998
11	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SH BUCKMAN	1998
12	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SC BUCKMAN	1998
13	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 SH BUCKMAN	1998
14	SNF AUSTRALIA	SNF AUSTRALIA	AN 934 TBF2 BETZ	1999
15	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
16	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
17	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
18	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
19	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
20	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
21	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
22	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
23	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
24	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
25	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
26	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	1999
27	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2000
28	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2000
29	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2000
30	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2000
31	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2000
32	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2000
33	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2000
34	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2000
35	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2000
36	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2000
37	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2001
38	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2001
39	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2001
40	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2001
41	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2001
42	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2001
43	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2001
44	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2001
45	SNF AUSTRALIA	SNF AUSTRALIA	FO 4290 PG1 BUCKMAN	2001
SNF USA to SNF AUSTRALIA Transactions /1/				
46	SNF AUSTRALIA	BUCKMAN LABORATORIES	EM 240 L	1998
47	SNF AUSTRALIA	BUCKMAN LABORATORIES	EM 240 L	1998
48	SNF AUSTRALIA	BUCKMAN LABORATORIES	EM 240 L	1998

Note:

/1/: I was not provided any SNF USA invoices for the time period 2000-2003.

Sources:

- (1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.
- (2) Schroeter, Russell H. (14 August 2008). "Affidavit of Russell Henry Schroeter," Electronic Exhibits.

Table 5D:

Proposed CUP Companies' Purchases in Australia or New Zealand

Proposed CUP Company	Number of Transactions			Source
	Direct from SNF Manufacturer	Through SNF AUSTRALIA	Total	
Proposed CUP Companies Not in Australia/New Zealand				
Akzo-Nobel N.V.	0	0	0	Tables 5B & 5C
Ashland Inc.	0	0	0	Tables 5B & 5C
Hercules Inc.	0	0	0	Tables 5B & 5C
Proposed CUP Companies Only Trading with/through SNF AUSTRALIA in Australia/New Zealand				
Buckman Laboratories	0	46	46	Tables 5B & 5C
Proposed CUP Companies Purchasing Through SNF AUSTRALIA and SNF Manufacturers in Australia/New Zealand				
Betz Laboratories Inc.	64	2	66	Tables 5B & 5C

Table 5E:

Sales By SNF Manufacturers to SNF AUSTRALIA and Proposed CUP Companies in Australia

Listing of Product Codes	All SNF AUSTRALIA Transactions	Proposed Australian CUP Transactions
Purchased by Both a Proposed CUP and SNF AUSTRALIA		
AN 934 /1/	409	23
FO 4190 /1/	174	21
AN 945 /1/	50	11
AN 910 /1/	55	2
FO 4350 /1/	252	1
All Other /2/	632	6
Sub Total	1,572	64
Purchased Only by SNF AUSTRALIA		
SAMPLES	583	--
DW 533 /1/	217	--
FO 4440 /1/	187	--
FA 920 /1/	184	--
FO 4650 /1/	168	--
EM 533 /1/	154	--
AN 905 /1/	143	--
AN 923 /1/	132	--
FO 4490 /1/	129	--
FO 4550 /1/	115	--
EM 640 /1/	88	--
FO 4290 /1/	74	--
3005 /1/	71	--
AN 956 SH	67	--
FO 4240 /1/	53	--
FO 4698 /1/	43	--
280 DRYPACK	39	--
EM 440 /1/	38	--
EM 340 /1/	34	--
GIFTS : OFFICE FURNITURES	34	--
FO 4800 /1/	32	--
AN 913 /1/	31	--
MATERIEL	30	--
FO 4107 /1/	28	--
FO 4125 /1/	27	--
EM 635	25	--
EM 140 /1/	23	--
PR 3005 /1/	23	--
DOCUMENTATIONS	21	--
FO 4700 /1/	21	--
DP/DW 635	19	--
INCONNU	19	--
EM 840 /1/	18	--
FO 4115 /1/	18	--
280	17	--
ACRYLAMIDE/1/	17	--
AL P 50 SH /1/	17	--
EM 240 /1/	17	--
DB 45 /1/	16	--
EM 230	15	--
JB 882	15	--
60	14	--
FO 4498 /1/	14	--
AL P 80 VHM QAL	13	--
DW 840 CT	13	--
FL 18-40	13	--
DP/DW 533 MPM	12	--
FO 4358 /1/	12	--
550	11	--
AN 926 /1/	11	--
COMMERCIAL FLYERS	11	--
DP AN 981 VHM	11	--
FL 45 /1/	10	--
PRP 4440	10	--
Sub Total	3,157	0
Total Transactions	4,729	64

Note:

/1/: Product code includes all codes that begin with shown code.

/2/: Product codes with fewer than ten SNF AUSTRALIA transactions are grouped into All Other.


Sources:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.


(2) Schroeter, Russell H. (14 August 2008). "Affidavit of Russell Henry Schroeter," Electronic Exhibits.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SAS
SNF s.a.s. - ZAC de Millieux
42163 Andrézieux Cedex
FRANCE



INVOICE

Tel: +33 (0)4 77 36 86 00
Fax: +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

INVOICE NR: 125917 **INVOICE DATE:** 22/01/1997

CUSTOMER NR: GE AUSTR 000 **DEPARTURE DATE FROM PORT:** 22/01/1997

FORWARDING AGENT: R.L. NICHOLSON PTY. LTD.
74 FOVEAUX ST.
SURREY HILLS

CARRIER: CARGA
ICC2000: CIF INGLEBURN DUTY UNPAID

PAYMENT: BANK TRANSFER
AT 90 DAYS DATE OF B/L
DUE DATE : 30/04/1997

P.O. NR: I-1817

SNF VAT CODE : FR 63430006643

NR	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1	FLOERGER FO 4190 BETZ BATCH NR 100197M11-2 TO 11 400 BAGS (S02) 25 KG	10000	3.790 AUD CIF DUTY UNPAID COMMODITY 39069090	37900.00

Settlement discount 0.00

NAME OF VESSEL : MSC SONIA
ETD : 05/02 - **ETA :** 25/03

GOODS OF FRENCH ORIGIN

	N.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight : 10000.00 KG			
Gross weight : 10400.00 KG			
10 BOX PALLETS	AUD 37900.00	0.00 <small>Sales tax</small>	AUD 37900.00

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 20.60 %

Please read enclosed the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until each time as they are paid for in full.

Bank :
CREDIT LYONNAIS ST ETIENNE CAE
FR65 3000 2037 2000 0006 1997 E63
SWIFT : CRLYFR3P

JOIN TO YOUR PAYMENT

INVOICE
125917

CUSTOMER

GE AUSTR
UTQ

Sigée social : SNF s.a.s au capital de 9.165.200 € - 20, rue de l'Innovation - Le Technopole - 42000 SAINT-ETIENNE - FRANCE
430 000 643 R.C.S. Saint-Etienne - SIRET 430 000 643 00028 - Code NAF 246 L - NP TVA CEE FR 63430006643


Customer

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 6.


Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF SAS
SNF s.a.s. - ZAC de Millaux
42163 Andrézieux Cedex
FRANCE

INVOICE



Tel: +33 (0)4 77 36 86 00
Fax: +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

INVOICE NR: 148444

INVOICE DATE: 11/03/1998

CUSTOMER NR: GE AUSTR 000

DEPARTURE DATE: 11/03/1998

FROM PLANT:

FORWARDING AGENT: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

CARRIER: SCAC
ICC2000 CIF SYDNEY DUTY UNPAID
CONTAINER NR MSCU 101 456/1/1

PAYMENT: BANK TRANSFER
AT 90 DAYS DATE OF B/L
DUE DATE : 20/06/1998

P.O. NR: 688

SNF VAT CODE : FR 63430006643

QTY	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1	2886 FLOERGER PO 4190 BETZ BATCH NR 060398M11-7 TO 16 400 BAGS (S02) 25 KG	10000	3.790 AUD	37900.00
				COMMODITY 39069090

Settlement discount 0.00
Carriage prepaid 3432.91

NAME OF VESSEL : MSC LUISA
ETD : 14/01 - ETA : 21/04

FOB PRICE : 1204,37 AUD
FREIGHT PRICE : 2228,54 AUD
GOODS OF FRENCH ORIGIN

	H.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight : 10000.00 KG			
Gross weight : 10400.00 KG			
10 BOX PALLETS	AUD 41332.91	0.00 <small>Sales tax</small>	AUD 41332.91

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 20.60 %

Please read carefully the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

Bank : CREDIT LYONNAIS ST ETIENNE CAE FR55 3000 2037 2000 0006 1997 E63 SWIFT : CRLYFRPP	INVOICE 148444 JOIN TO YOUR PAYMENT	CUSTOMER GE AUSTR UTQ
---	---	-----------------------------

Sège social : SNF s.a.s au capital de 8.185.200 € - 20, rue de l'Innovation - Le Technopôle - 42000 SAINT-ETIENNE - FRANCE
430 006 413 R.C.S. Saint-Etienne - SIRET 4301066 643 00026 - Code NAF 246 L - N° TVA CEE FR 63430006643


Customer

Source:


(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 6.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF SAS
SNF s.a.s. - ZAC de Milleux
42163 Andrézieux Cedex
FRANCE



INVOICE

Tel : +33 (0)4 77 36 86 00
Fax : +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

INVOICE NR: 174684

INVOICE DATE: 25/05/1999

CUSTOMER: GE AUSTR 000

DEPARTURE DATE: 25/05/1999

FROM PARTY: BETZDEARBORN AUSTRALIA PTY LTD

FORWARDING AGENT: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

CARRIER: CANMAR
ICC2000
CIF INGLEBURN
CONTAINER NR CMUU 227 283/0

PAYMENT: BANK TRANSFER
AT 90 DAYS DATE OF B/L
DUE DATE : 26/08/1999

P.O. NR: 1471

SNF VAT CODE : FR 63430006643

Customer

NE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1	FLOERGER FO 4190 BETZ BATCH NR 170599M11 - 4 TO 13 400 BAGS (S02) 25 KG	10000	3.870 AUD	38700.00
			COMMODITY 39069090	

Settlement discount 0.00
Carriage prepaid 3433.00

NAME OF VESSEL : P&O SYDNEY / 54305/224
ETD : 26/05
ETA : 26/06

GOODS OF FRENCH ORIGIN

	H.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight : 10000.00 KG			
Gross weight : 10400.00 KG			
10 BOX PALLETS	AUD 42133.00	0.00 <small>Sales tax</small>	AUD 42133.00

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 20.60 %

Please read overleaf the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until full time as they are said for in law.

Bank : CREDIT LYONNAIS ST ETIENNE CAE	INVOICE 174684	CUSTOMER GE AUSTR
FR65 3000 2037 2000 0006 1997 E63	JOIN TO YOUR PAYMENT	UPO
SWIFT : CRLYFRPP		


Silège social: SNF s.a.s au capital de 8 180 000 € - 20, rue de l'Innovation - Le Technopôle - 42000 SAINT-ETIENNE - FRANCE
420 000 663 R.C.S. SAINT-ETIENNE - SIRET 420 000 000 0008 - Code NAF 846 L - N° TVA CE FR 63430006643

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 6.


Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF s.a.s. - ZAC de Milieux
42163 Andrézieux Cedex
FRANCE

INVOICE



Tel: +33 (0)4 77 36 86 00
Fax: +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

INVOICE NR: 177132

INVOICE DATE: 28/06/1999

CUSTOMER NR: GE AUSTR 000

DEPARTURE DATE: 28/06/1999

FROM PLANT:

FORWARDING AGENT: R.L. NICHOLSON PTY. LTD.
74 FOVEAUX ST.
SURREY HILLS

CARRIER: CANMAR

ICC2000: CIF INGLEBURN DUTY UNPAID
CONTAINER NR CRXU 223 514/7

PAYMENT: BANK TRANSFERT
AT 90 DAYS DATE OF B/L
DUE DATE: 07/10/1999

P.O. NR: 1495

SNF VAT CODE : FR 63430006643

DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1223 FLOERGER AN 934 TBF2 BETZ BATCH NR 220699R13 600 BAGS (S02) 25 KG	15000	2.810 AUD EX WORKS PRICE	42150.00
			COMMODITY 39069090

Settlement discount 0.00
Carriage prepaid 3433.00

VESSEL: PONEJAKARTA

ETD : 08/07/1999 ETA : 08/08/1999

GOODS OF FRENCH ORIGIN

	NET WEIGHT	GROSS WEIGHT	T.T.C. AMOUNT
Net weight :	15000.00 KG		
Gross weight :	15600.00 KG		
20 PALLETS			AUD 45583.00

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 20.60 %

Please read over the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.


Bank : CREDIT LYONNAIS ST ETIENNE CAE FR65 3000 2037 2000 0006 1997 E63 SWIFT : CRLYFRPP	INVOICE 177132 JOIN TO YOUR PAYMENT	CUSTOMER GE AUSTR UTQ
--	---	-----------------------------

Siège social : SNF s.a.s au capital de € 165 200 € - 20, rue de l'innovation - La Technopole - 42000 SAINT-ETIENNE - FRANCE
430 056 043 R.C.S. Saint-Etienne - SIRET 430 056 043 0005 - Code NAF 2424 - N° TVA CEE FR 63430006643


Source:
(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 7.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF 1.s.s. - ZAC de Milleux SAS
42163 Andrézieux Cedex
FRANCE



INVOICE

Tel : +33 (0)4 77 36 86 00
Fax : +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

INVOICE NR: 207526 **INVOICE DATE:** 12/09/2000

CUSTOMER NR: GE AUSTR 000 **DEPARTURE DATE:** 12/09/2000
FROM BL/MT:

FORWARDING AGENT: R.L. NICHOLSON PTY. LTD.
74 FOVEAUX ST.
SURREY HILLS

CARRIER: CANMAR

ICC2000: CIF INGLEBURN DUTY UNPAID
CONTAINER NR CPSU 105 581/8

PAYMENT: BANK TRANSFERT
AT 90 DAYS DATE OF B/L
DUE DATE : 14/12/2000

P.O. NR: 2348

SNF VAT CODE : FR 63430006643

E	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1	1223 FLOERGER AN 934 PG2 BETZ BATCH NR 150600123 600 BAGS (S02) 25 KG	15000	1.760 EUR	26400.00
			COMMODITY 39069090	

Settlement discount 0.00
Carriage prepaid 2250.91


VESSEL: SCOTIA/69711/832 **ETD :** 15/09/2000 **ETA :** 15/10/2000

GOODS OF FRENCH ORIGIN

	N.W. AMOUNT	VAT AMOUNT	T.F.C. AMOUNT
Net weight : 15000.00 KG			
Gross weight : 15600.00 KG			
20 PALLETS	EUR 28650.91	0.00 <small>Sales tax</small>	EUR 28650.91

*Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 30 euros. VAT RATE = 19.60 %
Please read carefully the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

Bank :
CREDIT LYONNAIS ST ETIENNE CAE
FR65 3000 2037 2000 0006 1997 E63
SWIFT : CRLYFRPP



INVOICE
207526

CUSTOMER
GE AUSTR
UTQ


Siège social : SNF s.a.s au capital de 8 185 200 € - 20, rue de Flonovallon - Le Technopole - 42000 SAINT-ETIENNE - FRANCE
430 006 643 R.C.S. Saint-Etienne - SIRET 430 006 643 00028 - Code NAF 246 L - N° TVA CEE FR 63430006643

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 7.

Table 6:


Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF S.A.S. - ZAC de Millieux
42163 Andrézieux Cedex
FRANCE

INVOICE

INVOICE NR : 207724



Tel : +33 (0)4 77 36 86 00
Fax : +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: BETZDEARBORN AUSTRALIA P/L
69-67 WILLIAMSON ROAD
INGLEBURN, SYDNEY, NSW, 2565
AUSTRALIA

CUSTOMER NR: BETZ AUS 000

DEPARTURE DATE: 15/09/2000

FROM PLANT:

FORWARDING AGENT:

CARRIER: SCAC
ICC2000 CPT SYDNEY AIRPORT

PAYMENT: BANK TRANSFERT
AT 90 DAYS DATE OF B/L
DUE DATE : 15/12/2000

P.O. NR: 2221/ADDITION

BETZDEARBORN AUSTRALIA PTY LTD
ACN-001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

SNF VAT CODE : FR 63430006643

NR	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
2886	FLOERGER FO 4190 BETZ BATCH NR 120800Z17 80 BAGS (S02) 25 KG	2000	2.270 EUR	4540.00
				COMMODITY 39069090

Settlement discount 0.00

Carriage prepaid 288.12

GOODS OF FRENCH ORIGIN

	H.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight : 2000.00 KG			
Gross weight : 2080.00 KG			
2 PALLETS	EUR 4828.12	EUR 0.00 <small>Sales tax</small>	EUR 4828.12

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 19.60 %

Please read overleaf the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

Bank : CREDIT LYONNAIS ST ETIENNE CAE
FR65 3000 2037 2000 0006 1997 E63
SWIFT : CRLYFRPP

INVOICE
207724

CUSTOMER
BETZ AUS
UTQ

2016 TO YOUR PAYMENT


Siège social : SNF S.A.S au capital de 8 165 500 € - 20, rue de l'Innovation - La Treppeville - 42000 SAINT-ETIENNE - FRANCE
430 000 540 P.C.S. Saint-Etienne - SIRET 430 000 540 0005 - Code NAF 246 L - INTRACEE FR 54000543

Source:


(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 6.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF SAS
SNF s.a.s. - ZAC de Millieux
42163 Andrézieux Cedex
FRANCE



INVOICE

Tel : +33 (0)4 77 36 86 00
Fax : +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

INVOICE NR: 222233 **INVOICE DATE:** 19/03/2001

CUSTOMER NR: GE AUSTR 000 **DEPARTURE DATE:** 19/03/2001

FROM BLANT:

FORWARDING AGENT: R.L. NICHOLSON PTY. LTD.
74 FOVEAUX ST.
SURREY HILLS

CARRIER: CARGA

ICC2000: CIF INGLEBURN DUTY UNPAID

PAYMENT: BANK TRANSFERT
AT 90 DAYS DATE OF B/L
DUE DATE : 28/06/2001

P.O. NR: 2617

Customer

BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

SNF VAT CODE : FR 63430006643

QTE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1223	FLOERGER AN 934 PG2 BETZ BATCH NR 140301R13 920 BAGS (S02) 25 KG	23000	1.857 EUR	42711.00
2	FLOERGER FO 4190 BETZ BATCH NR 080301Z17 280 BAGS (S02) 25 KG	7000	2.395 EUR	16765.00

Multiple Transactions

M. MOULARD - A. SOURET - A. CELLARD
D. FOURNEL - J.C. MARTIN
Notaires Associés - B.P. 109
13, place de l'Hôtel de Ville
42003 SAINT-ETIENNE CEDEX 1
Tél. 04 77 49 53 49

Settlement discount 0.00
Carriage prepaid 4252.41

VESSEL: MSC NURIA/39092050263 ETD : 30/03/2001 ETA : 08/05/2001

GOODS OF FRENCH ORIGIN

	N. P.	AMOUNT	VAT	AMOUNT	T. T. C.	AMOUNT
Net weight :		30000.00 KG				
Gross weight :		31200.00 KG				
40 PALLETS	EUR	63728.41	0.00	63728.41	EUR	63728.41

VAT RATE = 19.60 %

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros.
Please read over the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

Bank : CREDIT LYONNAIS ST ETIENNE CAB
FR65 3000 2037 2000 0006 1997 E63
SWIFT : CRLYFRPP

222233

3018 20 1008 PAYSFP

INVOICE

CUSTOMER

GE AUSTR

UTQ


Sillage social : SNF s.a.s au capital de 8.185.200 € - 20, rue de l'Innovation - La Technopole - 42000 SAINT-ETIENNE - FRANCE
430 006 643 R.L.C.S. Saint-Etienne - SIRET 430 006 643 00226 - Code NAF 246 L - N° TVA CEE FR 63430006643

Source:


(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 6.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF s.a.s. - ZAC de Millieux
42163 Andrézieux Cedex
FRANCE



INVOICE

Tel : +33 (0)4 77 36 86 00
Fax : +33 (0)4 77 36 86 90
e-mail: info@snf.fr

DELIVERY ADDRESS: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

INVOICE NR: 225406

INVOICE DATE: 25/04/2001

CUSTOMER NR: CE AUSTR 000 DEPARTURE DATE: 25/04/2001
FROM PLANT:

FORWARDING AGENT: R.L. NICHOLSON PTY. LTD.
74 FOVEAUX ST.
SURREY HILLS

CARRIER: CARGA
ICC2000 CIF INGLEBURN DUTY UNPAID

PAYMENT: BANK TRANSFERT
AT 90 DAYS DATE OF B/L
DUE DATE : 02/08/2001

P.O. NR: 2701

SNF VAT CODE : FR 63430006643

Customer

BETZDEARBORN AUSTRALIA PTY LTD

ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1223 FLOERGER AN 934 PG2 BETZ BATCH NR 190401R13 600 BAGS (S02) 25 KG	15000	1.857 EUR	27855.00
			COMMODITY 39069090

Settlement discount 0.00
Carriage prepaid 2250.00

VESSEL: MSC VIVIANA/39092090021

ETD : 03/05/2001 ETA : 16/06/2001

GOODS OF FRENCH ORIGIN		H.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight :	15000.00 KG	EUR		EUR
Gross weight :	15600.00 KG	30105.00	0.00	30105.00
20 PALLETS			Sales tax	

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 19.60 %

Please read overleaf the general terms of sale including the references to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

Bank : CREDIT LYONNAIS ST ETIENNE CAE
FR65 3000 2037 2000 0006 1997 E63

SWIFT : CRLYFRPP

Site social : SNF s.a.s au capital de 8.185.000 € - 20, rue de l'Innovation - Le Technoparc - 42000 SAINT-ETIENNE - FRANCE
430 006 640 R.C.S. Saint-Etienne - SIRET 430 006 640 00026 - Code NAF 261 L - N° TVA CEE FR 04-30000643

INVOICE 225406

CUSTOMER GE AUSTR


JOIN TO YOUR PAYMENT UTQ

Source:


(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 7.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF s.a.s. - ZAC de Hilleux
42163 Andrézieux Cedex
FRANCE



INVOICE

Tel : +33 (0)4 77 36 86 00
Fax : +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

FORWARDING AGENT: R.L. NICHOLSON PTY. LTD.
74 FOVEAUX ST.
SURREY HILLS

CARRIER: CARGA
ICC2000 CIF INGLEBURN DUTY UNPAID
CONTAINER NR

PAYMENT: BANK TRANSFERT
AT 90 DAYS DATE OF B/L
DUE DATE : 08/08/2002

P.O. NR : 3379

INVOICE NR : 256065

CUSTOMER NR : GE AUSTR 000

DEPARTURE DATE : 29/04/2002

FROM PLANT:

Customer → **BETZDEARBORN AUSTRALIA PTY LTD**
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

SNF VAT CODE : FR 63430006643

NE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
2886	FLOERGER FO 4190 BETZ BATCH NR 180202GA19 200 BAGS (S02) 25 KG	5000	2.270 EUR	11350.00
			COMMODITY 39069090	

Settlement discount 0.00
Carriage prepaid 1534.17

VESSEL: CS OPTIMISM /390 9234 0062 ETD : 09/05/2002 ETA : 12/06/2002

FOB : 395,00 EUR
FREIGHT : 1 131,68 EUR (1 021 USD)
INSURANCE : 7,49 EUR

GOODS OF FRENCH ORIGIN

	N.E.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight : 5000.00 KG			
Gross weight : 5200.00 KG			
5 PALLETS	12884.17	0.00	12884.17

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 19.60 %
Please read overleaf the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

BANK : CREDIT LYONNAIS ST ETIENNE CAE FR65 3000 2037 2000 0006 1997 E63 SWIFT : CRLYFRPP	INVOICE 256065 2018 20 YOUR PAYMENT CUSTOMER GE AUSTR UTQ
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Siège social : SNF s.a.s. au capital de 8.185.000 € - 20, rue de l'Innovation - La Technopole - 42000 SAINT-ETIENNE - FRANCE
430 006 643 R.C.S. Saint-Etienne - SIRET 430 006 643 00020 - Code NAF 245 L - N° TVA CEE FR 63430006643

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 6.


Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF
SAS
SNF s.a.s. - ZAC de Milieux
42163 Andrézieux Cedex
FRANCE

INVOICE



Tel : +33 (0)4 77 36 86 00
Fax : +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

INVOICE NR: 261581 **INVOICE DATE:** 27/06/2002

CUSTOMER NR: GE AUSTR 000 **DEPARTURE DATE:** 27/06/2002

FROM PLANT:

FORWARDING AGENT: R.L. NICHOLSON PTY. LTD.
74 FOVEAUX ST.
SURREY HILLS

CARRIER: CARGA

ICC2000: CIF INGLEBURN DUTY UNPAID
CONTAINER NR

PAYMENT: BANK TRANSFERT
AT 90 DAYS DATE OF B/L
DUE DATE : 03/10/2002

P.O. NR: 3680

Customer

BETZDEARBORN AUSTRALIA PTY LTD
ACN 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

SNF VAT CODE : FR 63430006643

TE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
A	G1223 FLOERGER AN 934 PG2 NWS BETE BATCH NR 180602X16 480 BAGS (S02) 25 KG	12000	1.760 EUR	21120.00
B	G2830 FLOERGER AN 945 SH BATCH NR U70602X16 40 BAGS (S02) 25 KG	1000	1.857 EUR	1857.00
J	G1223 FLOERGER AN 934 PG2 NWS BETE BATCH NR 180602X16 80 BAGS (S02) 25 KG	2000	1.760 EUR	3520.00

Multiple Transactions

Settlement discount 0.00
Carriage prepaid 2250.00

VESSEL: MSC REGINA/390 92 76 0044 ETD : 05/07/2002 ETA : 13/08/2002

GOODS OF FRENCH ORIGIN

Net weight	Gross weight	NET WEIGHT AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
15000.00 KG	15600.00 KG	EUR 28747.00	0.00	EUR 28747.00
20 PALLETS			Sales tax	

*Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 19.60 %

Please read overleaf the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

Bank : CREDIT LYONNAIS ST ETIENNE CAE
FR65 3000 2037 2000 0006 1997 E63

SWIFT : CRLYFRPP

INVOICE 261581 CUSTOMER GE AUSTR UTQ

JOIN TO YOUR PAYMENT


Siège social : SNF s.a.s au capital de 8.165.200 € - 20, rue de l'Innovation - Le Technopôle - 42000 SAINT-ETIENNE - FRANCE
430 006 643 R.C.S. Saint-Etienne - SIRET 430 006 643 00026 - Code NAF 248 L - N° TVA CEE FR 63430006643

Source:


(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 7.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF S.A.S. - ZAC de Milleux
42163 Andrézieux Cedex
FRANCE



INVOICE

Tel: +33 (0)4 77 36 85 00
Fax: +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: GE BETZ AUSTRALIA PTY LTD
ABN 84 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

FORWARDING AGENT: R.L. NICHOLSON PTY. LTD.
74 POVEAUX ST.
SURREY HILLS

CARRIER: ROHLIG
ICC2000 CIF INGLEBURN
TC NR GSTU 237 132/5

PAYMENT: BANK TRANSFERT
AT 90 DAYS DATE OF B/L
DUE DATE : 08/03/2004

P.O. NR: 4731

INVOICE NR: 307681

CUSTOMER NR: GE AUSTR 000

DEPARTURE DATE FROM PLANT: 04/12/2003

Customer →

FORWARDING AGENT: R.L. NICHOLSON PTY. LTD.
74 POVEAUX ST.
SURREY HILLS

CARRIER: ROHLIG
ICC2000 CIF INGLEBURN
TC NR GSTU 237 132/5

PAYMENT: BANK TRANSFERT
AT 90 DAYS DATE OF B/L
DUE DATE : 08/03/2004

P.O. NR: 4731

GE BETZ AUSTRALIA PTY LTD
ABN 84 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

SNF VAT CODE : FR 63430006643

E	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1223	FLORET AN 934 PG2 NWS BETZ BATCH NR 211003717	11500	1.740 EUR NEW PRICE 10/03	20010.00
	460 BAGS (S02) 25 KG		COMMODITY 39069090	
2	2886 FLORET FO 4190 PG2 NWS BETZ BATCH NR 011003622	3500	2.410 EUR NEW PRICE 10/03	8435.00
	140 BAGS (S02) 25 KG		COMMODITY 39069090	

Multiple Transactions

M. MOULARD - A. SOURET - A. CELLARD
D. FOURNEL - JC. MARTIN
Notaires Associés - B.P. 109
13, place de l'Hôtel de Ville
42003 SAINT-ETIENNE CEDEX 1
Tel. 04 77 49 53 49

Settlement discount 0.00
Carriage prepaid 2102.74

VESSEL: MSC PERTH MR0061717 ETD : 11/12/2003 ETA : 17/01/2004

FOB : 755,00 EUR
MARITIM FREIGHT : 1 327,59 EUR
INSURANCE : 20,15 EUR

GOODS OF FRENCH ORIGIN

Net weight	Gross weight	H.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
15000.00 KG	15600.00 KG	EUR 30547.74	EUR 0.00 Sales tax	EUR 30547.74
20 PALLETS				

VAT RATE = 19.60 %

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros.
Please read overleaf the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

Bank : CREDIT LYONNAIS ST ETIENNE CAE
FR65 3000 2037 2000 0006 1997 E63
SWIFT : CRLYPRFP

INVOICE
307681

CUSTOMER
GE AUSTR
UTO


Site social : SNF a.s. au capital de 8 185 200 € - 20, rue de l'Innovation - La Technopole - 42000 SAINT-ETIENNE - FRANCE
430 000 640 R.C.S. Saint-Etienne - SIRET 430 000 640 0000 - Code NAF 2641 - N° TVA CEES FR 63430006643

Source:


(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 6.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia



SNF SAS
SNF s.a.s. - ZAC de Milleux
42163 Andrézieux Cedex
FRANCE



INVOICE

Tel : +33 (0)4 77 36 86 00
Fax : +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: GE BETZ AUSTRALIA PTY LTD
ABN 84 001 221 941
69-77 WILLIAMSON ROAD
INGLEBURN NSW 2565
AUSTRALIA

INVOICE NR: 309274 **INVOICE DATE:** 24/12/2003

CUSTOMER NR: GE AUSTR 000 **DEPARTURE DATE:** 24/12/2003
FROM PLANT:

FORWARDING AGENT: CLOSE INESON OBM PTY LTD
61 RENNICK STREET REDFERN
SYDNEY NSW2016 AUSTRALIA

CARRIER: ROHLIG

ICC2000: CIF INGLEBURN
CONTAINER NR MSCU 279 595/7

PAYMENT: BANK TRANSFERT
AT 90 DAYS DATE OF B/L
DUE DATE : 28/03/2004

P.O. NR: 4800

SNF VAT CODE : FR 63430006643

S	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1	1222 FLORET AN 934 PG2 NWS BETZ BATCH NR 1911030218 440 BAGS (S02) 25 KG	11000	1.740 EUR	19140.00
2	2886 FLORET FO 4190 PG2 NWS BETZ BATCH NR 1911030222 160 BAGS (S02) 25 KG	4000	2.410 EUR	9640.00

COMMODITY 39069090

COMMODITY 39069090

Settlement discount 0.00
Carriage prepaid 2050.33

VESSEL: MSC MARTINA MR0062390 ETD : 27/01/2004 ETA : 03/03/2004

GOODS OF FRENCH ORIGIN

	H.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight : 15000.00 KG			
Gross weight : 15600.00 KG			
20 PALLETS	EUR 30830.33	0.00 <small>Sales tax</small>	EUR 30830.33

VAT RATE = 19.60 %

Penalty for late payment calculated each day - legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. Payment must overleaf the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

Bank : CREDIT LYONNAIS ST ERIENNE CAB
FR65 3000 2037 2000 0006 1997 E63
SWIFT : CRLYFR33

Siège social : SNF s.a.s au capital de 8 185 200 € - 20, rue de l'innovation - La Teste-de-France - 33000 SAINT ETIENNE - FRANCE
430 005 043 R.C.S. Saint-Etienne - SIRET 430 005 043 0008 - Code NAF 261 L - INTRACÉE FR 824000080

INVOICE 309274 CUSTOMER GE AUSTR UTQ

2018 TO YOUR PAYMENT

*06-AUT-VERFÜR LERN-GOÜNCTIKUR UN-ERÄLÄÉ DE VEITE
*06-AUT-VERFÜR LERN-GOÜNCTIKUR UN-ERÄLÄÉ DE VEITE

Customer

Multiple Transactions

Source:
(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 7.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 217563	Invoice Date: 2001
Delivery Address:	BETZDEARBORN AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	
Freight:	INCONNU	
Delivery:	NA	
Payment:	BANK TRANSFERAT 90 DAYS INVOICE DATE	
P.O.	INVOICE 205847	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	EXTRA CHARGE FOR UNLOADING (WAITING TIME)	1	157.720 EUR	157.72

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 230286	Invoice Date: 2001
Delivery Address:	BETZDEARBORN AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	BETZDEARBORN AUSTRALIA PTY LTD
Freight:	INCONNU	↑
Delivery:	NA	Customer
Payment:	CREDIT NOTE	
P.O.	CANCELLATION OF INVOICE 217563	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	EXTRA CHARGES FOR UNLOADING INCONNU	0	157.720 EUR	-157.72

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 261618 **Invoice Date: 2002**

Delivery Address: HERCULES AUSTRALIA PTY LTD

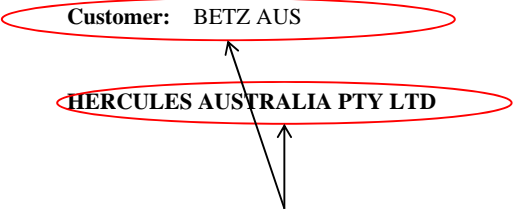
Forwarding Agent: NA

Carrier: NA
Freight: CIF SPRINGVALE
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 20208

Customer: BETZ AUS
HERCULES AUSTRALIA PTY LTD
Customer /3/



LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	WSB 40 BASE WS 72 - 40%	18,000	1.030 EUR	18,540.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provide and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

/3/: HERCULES owned BETZ from 1998 until 2002 when it sold BETZ to General Electric. It appears that the proposed CUP purchasing entity remained the same throughout audit period, but had different ownership.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

(2) Hercules Inc. (31 March 2003). Form 10-K for Fiscal Year Ended 31 December 2002, pp. 2-3.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 179354 **Invoice Date:** 1999

Delivery Address: BETZDEARBORN AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** BETZ AUS

Carrier: NA
Freight: CPT SYDNEY AIRPORT
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 1646

BETZDEARBORN AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	INCONNU AN 945 SH	1,000	2.910 AUD	2,910.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 184529 **Invoice Date:** 1999
Delivery Address: BETZDEARBORN AUSTRALIA PTY LTD
Forwarding Agent: NA **Customer:** GE AUSTR
Carrier: NA
Freight: CIF INGLEBURN DUTY UNPAID
Delivery: NA
Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L
P.O. 1704

BETZDEARBORN AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 TBF2 BETZ	15,000	2.810 AUD	42,150.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 198520 **Invoice Date:** 2000
Delivery Address: BETZDEARBORN AUSTRALIA PTY LTD
Forwarding Agent: NA **Customer:** GE AUSTR
Carrier: NA
Freight: CIF INGLEBURN DUTY UNPAID
Delivery: NA
Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L
P.O. 2086

BETZDEARBORN AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 TBF2 BETZ	15,000	1.760 EUR	26,400.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 199629 **Invoice Date:** 2000

Delivery Address: BETZDEARBORN AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CPT SYDNEY AIRPORT
Delivery: NA

Payment: BANK TRANSFERAT 90 DAYS DATE OF B/L

P.O. 2168

BETZDEARBORN AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 TBF2 BETZ	2,000	1.760 EUR	3,520.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 205847 **Invoice Date:** 2000
Delivery Address: BETZDEARBORN AUSTRALIA PTY LTD
Forwarding Agent: NA **Customer:** GE AUSTR
Carrier: NA **BETZDEARBORN AUSTRALIA PTY LTD**
Freight: CIF INGLEBURN DUTY UNPAID
Delivery: NA
Payment: BANK TRANSFERAT 90 DAYS DATE OF B/L
P.O. 2221

↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 BETZ	5,000	1.760 EUR	8,800.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 209559	Invoice Date: 2000
Delivery Address:	BETZDEARBORN AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	BETZDEARBORN AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN DUTY UNPAID	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	2400	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 BETZ	7,500	1.760 EUR	13,200.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 215064 **Invoice Date:** 2000
Delivery Address: BETZDEARBORN AUSTRALIA PTY LTD
Forwarding Agent: NA **Customer:** GE AUSTR
Carrier: NA
Freight: CIF INGLEBURN DUTY UNPAID
Delivery: NA
Payment: BANK TRANSFERAT 90 DAYS DATE OF B/L
P.O. 2458

BETZDEARBORN AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 BETZ	15,000	1.760 EUR	26,400.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 222233	Invoice Date: 2001
Delivery Address:	BETZDEARBORN AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	BETZDEARBORN AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN DUTY UNPAID	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	2617	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 BETZ	23,000	1.857 EUR	42,711.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 232384	Invoice Date: 2001
Delivery Address:	BETZDEARBORN AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	BETZDEARBORN AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN DUTY UNPAID	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	2977	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	G3830	5,000	1.857 EUR	9,285.00
	AN 945 SH			

Net Weight: NA
 Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 265970
Invoice Date: 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA
Customer: GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN DUTY UNPAID
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 3894

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	G1223 AN 934 PG2 NWS BETZ	9,000	1.760 EUR	15,840.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 265970
Invoice Date: 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA
Customer: GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN DUTY UNPAID
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 3894

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	G3830	2,000	1.857 EUR	3,714.00
	AN 945 SH			

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 271602
Invoice Date: 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA
Customer: GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 3978

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 NWS BETZ	2,000	1.760 EUR	3,520.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 271602	Invoice Date: 2002
Delivery Address:	GE BETZ AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	GE BETZ AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	3978	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	3830 AN 945 SH	1,000	1.857 EUR	1,857.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 271602 **Invoice Date:** 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 3978

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	3830 AN 945 SH	2,000	1.857 EUR	3,714.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 271603 **Invoice Date:** 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4006

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 NWS BETZ	8,000	1.760 EUR	14,080.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 271603	Invoice Date: 2002
Delivery Address:	GE BETZ AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	GE BETZ AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	4006	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	3830 AN 945 SH	2,000	1.857 EUR	3,714.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 276204 **Invoice Date:** 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4114

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 NWS BETZ	6,000	1.760 EUR	10,560.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 276204
Invoice Date: 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA
Customer: GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4114

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	3830 AN 945 SH	6,000	1.857 EUR	11,142.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 282314 **Invoice Date:** 2003

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4253

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 NWS BETZ	11,500	1.740 EUR	20,010.00

Net Weight: NA
Gross Weight: NA

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

- (1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 282314 **Invoice Date:** 2003

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4253

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1565 AN 910 PWG BETZ	1,500	1.630 EUR	2,445.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 282314 **Invoice Date:** 2003

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4253

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	3830 AN 945 SH BETZ	1,000	1.630 EUR	1,630.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 288747 **Invoice Date:** 2003
Delivery Address: GE BETZ AUSTRALIA PTY LTD
Forwarding Agent: NA **Customer:** GE AUSTR
Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA
Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L
P.O. 4356

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1565 AN 910 PWG BETZ	1,000	1.630 EUR	1,630.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 288747	Invoice Date: 2003
Delivery Address:	GE BETZ AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	GE BETZ AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	4356	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 NWS BETZ	7,000	1.740 EUR	12,180.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 288747	Invoice Date: 2003
Delivery Address:	GE BETZ AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	GE BETZ AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	4356	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 NWS BETZ	1,000	1.740 EUR	1,740.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 288747
Invoice Date: 2003
Delivery Address: GE BETZ AUSTRALIA PTY LTD
Forwarding Agent: NA
Customer: GE AUSTR
Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA
Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L
P.O.: 4356

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	3830 AN 945 SH BETZ	2,000	1.630 EUR	3,260.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 301484 **Invoice Date:** 2003

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4608

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 NWS BETZ	7,000	1.830 EUR	12,810.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 301484	Invoice Date: 2003
Delivery Address:	GE BETZ AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	GE BETZ AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	4608	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	3830 AN 945 SH BETZ	3,000	1.720 EUR	5,160.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 301484 **Invoice Date:** 2003

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4608

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	1223 AN 934 PG2 NWS BETZ	3,000	1.830 EUR	5,490.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 153003	Invoice Date: 1998
Delivery Address:	BETZDEARBORN AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	BETZDEARBORN AUSTRALIA PTY LTD
Freight:	CIF SYDNEY	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERAT 90 DAYS DATE OF B/L	
P.O.	838	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 BETZ	10,000	3.790 AUD	37,900.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 198520	Invoice Date: 2000
Delivery Address:	BETZDEARBORN AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	BETZDEARBORN AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN DUTY UNPAID	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	2086	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 BETZ	2,000	2.270 EUR	4,540.00

Net Weight: NA
Gross Weight: NA

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

- (1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 205847	Invoice Date: 2000
Delivery Address:	BETZDEARBORN AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	BETZDEARBORN AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN DUTY UNPAID	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERAT 90 DAYS DATE OF B/L	
P.O.	2221	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 BETZ	10,000	2.270 EUR	22,700.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 209559 **Invoice Date:** 2000
Delivery Address: BETZDEARBORN AUSTRALIA PTY LTD
Forwarding Agent: NA **Customer:** GE AUSTR
Carrier: NA
Freight: CIF INGLEBURN DUTY UNPAID
Delivery: NA
Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L
P.O. 2400

BETZDEARBORN AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 BETZ	7,000	2.270 EUR	15,890.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 265970	Invoice Date: 2002
Delivery Address:	GE BETZ AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	GE BETZ AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN DUTY UNPAID	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	3894	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 PG2 NWS BETZ	4,000	2.270 EUR	9,080.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 271602 **Invoice Date:** 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 3978

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 PG2 NWS BETZ	4,000	2.270 EUR	9,080.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 271602 **Invoice Date:** 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 3978

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 PG2 NWS BETZ	2,000	2.270 EUR	4,540.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 271602	Invoice Date: 2002
Delivery Address:	GE BETZ AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	GE BETZ AUSTRALIA PTY LTD
Freight:	CIF INGLEBURN	↑
Delivery:	NA	Customer
Payment:	BANK TRANSFERTAT 90 DAYS DATE OF B/L	
P.O.	3978	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 PG2 NWS BETZ	2,000	2.270 EUR	4,540.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 271603 **Invoice Date:** 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4006

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 PG2 NWS BETZ	5,000	2.270 EUR	11,350.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 276204
Invoice Date: 2002

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA
Customer: GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4114

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 PG2 NWS BETZ	3,000	2.270 EUR	6,810.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 282314 **Invoice Date:** 2003

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4253

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 PG2 NWS BETZ	4,000	2.410 EUR	9,640.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 288747 **Invoice Date: 2003**

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer: GE AUSTR**

Carrier: NA

Freight: CIF INGLEBURN

Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4356

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 PG2 NWS BETZ	7,000	2.410 EUR	16,870.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provide and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 301484 **Invoice Date:** 2003

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4608

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	2886 FO 4190 PG2 NWS BETZ	1,000	2.470 EUR	2,470.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

SNF Manufacturer: SNF FLOERGER
Invoice Number: 301484 **Invoice Date:** 2003

Delivery Address: GE BETZ AUSTRALIA PTY LTD

Forwarding Agent: NA **Customer:** GE AUSTR

Carrier: NA
Freight: CIF INGLEBURN
Delivery: NA

Payment: BANK TRANSFERTAT 90 DAYS DATE OF B/L

P.O. 4608

GE BETZ AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	10412 FO 4350 SH	1,500	2.360 EUR	3,540.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 723909	Invoice Date: 2003
Delivery Address:	GE BETZ AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	GE BETZ AUSTRALIA PTY LTD
Freight:	FREE DELIVERED CLEARED	↑
Delivery:	NA	Customer
Payment:	FREE SAMPLES INVOICE WITHOUT PAYMENT	
P.O.	ATTN : ERIC LAMB	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	INCONNU SAMPLES	1	0.000 EUR	0.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 726385	Invoice Date: 2003
Delivery Address:	GE BETZ AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	GE BETZ AUSTRALIA PTY LTD
Freight:	FREE DELIVERED CLEARED	↑
Delivery:	NA	Customer
Payment:	FREE SAMPLES INVOICE WITHOUT PAYMENT	
P.O.	ATTN : SIMON PERRY	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	INCONNU SAMPLES	1	0.000 EUR	0.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 6:

Invoices and Invoice Summaries of all Proposed CUP Purchases in Australia

		SNF Manufacturer: SNF FLOERGER
	Invoice Number: 728345	Invoice Date: 2003
Delivery Address:	GE BETZ AUSTRALIA PTY LTD	
Forwarding Agent:	NA	Customer: GE AUSTR
Carrier:	NA	GE BETZ AUSTRALIA PTY LTD
Freight:	FREE DELIVERED CLEARED	↑
Delivery:	NA	Customer
Payment:	FREE SAMPLES INVOICE WITHOUT PAYMENT	
P.O.	ATTN : KATHLEEN DAVIES	

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	INCONNU SAMPLES	1	0.000 EUR	0.00

Net Weight: NA
Gross Weight: NA

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the information on an invoice. As such, I have only filled in the fields where information was provided and appeared accurate.


/2/: For illustrative purposes, I show a separate invoice for each transaction even if these transactions appear on the same invoice as other products sold directly to proposed CUP companies.

Source:


(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia



SNF
SAS
SNF s.a.s. - ZAC de Millieux
42163 Andrézieux Cedex
FRANCE



INVOICE

Tel: +33 (0)4 77 36 86 00
Fax: +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: SNF AUSTRALIA N.S.WALES
C/-UNITED TRANSPORT SERVICES
CNR GREAT WESTERN HIGHWAY &
DOONSID ROAD ARNDELL PARK
NEW SOUTH WALES 2148
AUSTRALIA

INVOICE NR: 170448 **INVOICE DATE:** 15/03/1999

CUSTOMER NR: SNF AUST 058 **DEPARTURE DATE:** 15/03/1999
FROM PLANT

FORWARDING AGENT: PETER HODDER & ASSOCIATES
UNIT 4, LEVEL 3, 14 QUEENS ROAD
MELBOURNE 3004 - VICTORIA

CARRIER: CANMAR
ICC2000 CIF SYDNEY
CONTAINER NR CMBU 227 201/8

PAYMENT: BANK TRANSFER
AT RECEIPT
DUE DATE: 20/04/1999

P.O. NR: PO 99/02/01

Customer →

SNF AUSTRALIA PTY LTD
UNIT 4, 168 BALCATTA ROAD
BALCATTA, PERTH
WEST AUSTRALIA 6021
AUSTRALIA

SNF VAT CODE: FR 63430006643

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1	AN 934 TBF2 FLOERGER AN 934 CBF2 BETZ 600 BAGS (801) 25 KG	15000	2.700 AUD	40500.00
				COMMODITY 39069090

↑
BETZ
designated
on product
description.

M. MOULARD - A. BOURET & CELLARD
D. FOURNEL - J. MARTIN
Notaires Associés - B.P. 109
13, place de l'Hôtel de Ville
42003 SAINT-ETIENNE CEDEX 1
Tel. 04 77 49 53 49

Settlement discount 0.00

NAME OF VESSEL : P&O SYDNEY / 51886/533
ETD : 17/03/99 - ETA : 12/04/99
FOB : 1296,37 AUD - FREIGHT : 2046,54 AUD - INSURANCE : 26,73 AUD

GOODS OF FRENCH ORIGIN

	H.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight : 15000.00 KG			
Gross weight : 15600.00 KG	AUD		AUD
20 BOX PALLETS	40500.00	0.00 <small>Sales tax</small>	40500.00

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 20.60 %

*base and overall the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

Bank : CREDIT LYONNAIS ST ETIENNE CAB FR55 3000 2037 2000 0006 1997 B63 SWIFT : CMLYFR33	INVOICE 170448 <small>JOIN TO YOUR PAYMENT</small>	CUSTOMER SNF AUST UTI
---	--	-----------------------------


Siège social : SNF s.a.s au capital de 8.185.200 € - 20, rue de l'Innovation - Le Technopôle - 42000 SAINT-ETIENNE - FRANCE
430 006 843 R.C.S. Saint-Etienne - SIRET 430 006 843 00028 - Code NAF 242 L - N° TVA CEE FR 55430006643

Sources:


- (1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 7.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia



SNF s.a.s. - ZAC de Milieux
42163 Andrézieux Cedex
FRANCE



INVOICE

Tel : +33 (0)4 77 36 86 00
Fax : +33 (0)4 77 36 86 96
e-mail: info@snf.fr

DELIVERY ADDRESS: SNF AUSTRALIA PTY LTD VICTORIA
C/-ALLIED SEAFREIGHT
1 HARDY ROAD
BROOKLYN, MELBOURNE
VICTORIA 3025
AUSTRALIA

FORWARDING AGENT: PETER HODDER & ASSOCIATES
UNIT 4, LEVEL 3, 14 QUEENS RD
MELBOURNE VIC 3004 AUSTRALIA

CARRIER: SCAC
ICC2000 CIF MELBOURNE
CONTAINER NR TPUH 680 095/8

PAYMENT: BANK TRANSFER
AT RECEIPT
DUE DATE : 15/12/1998

P.G. NR: 98/09/98

INVOICE NR: 162054

CUSTOMER NR: SNF AUST 048

DEPARTURE DATE: 23/10/1998

FROM PLANT:

SNF AUSTRALIA PTY LTD
UNIT 4, 168 BALCATTA ROAD
BALCATTA, PERTH
WEST AUSTRALIA 6021
AUSTRALIA

Customer

SNF VAT CODE : FR 63430006643

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1	FLOERGER AN 934 CBF2 BETZ 600 BAGS (S01) 25 KG	15000	2.450 AUD	36750.00
			COMMODITY 39069090	

BETZ
designated
on product
description.

Quantity =
15,000

Prices:
\$2.45 AUD

M. MOULARD - A. BOURET - A. CELLARD
D. FOURNEL - MARTIN
Notaires Associés - B.P. 109
19, place de l'Hôtel de Ville
42008 SAINT-ETIENNE CEDEX 1
Tél. 04 77 49 93 49

Settlement discount 0.00

CHEMICAL PRODUCT NOT DANGEROUS
NAME OF VESSEL : MSC CHIARRA / CHME 04
ETD : 28/10/98 - ETA : 09/12/98
FOB : 1432,46 AUD - FREIGHT : 2724,20 AUD - INSURANCE : 27 AUD

GOODS OF FRENCH ORIGIN

	H.T. AMOUNT	VAT AMOUNT	T.T.C. AMOUNT
Net weight : 15000.00 KG	AUD		AUD
Gross weight : 15600.00 KG			
20 BOX PALLETS	36750.00	0.00	36750.00
		<small>Sales tax</small>	

Penalty for late payment calculated each day = legal interest rate x 1.5 plus 10 points, with a minimum of 50 euros. VAT RATE = 20.60 %
*lease read over the general terms of sale including the reference to clauses of the applicable legislation and the clause reserving ownership of the products until such time as they are paid for in full.

Bank : CREDIT LYONNAIS ST ETIENNE CAE
FR65 3000 2037 2000 0006 1997 E63
SWIFT : CRLYFRPP

INVOICE 162054
CUSTOMER SNF AUST
JOIN TO YOUR PAYMENT UTI

Siège social : SNF s.a.s au capital de 8 185 000 € - 20, rue de l'Innovation - Le Technoparc - 42000 SAINT-ETIENNE - FRANCE
430 058 043 R.C.S. Saint-Etienne - SIRET 430 058 043 0005 - Code NAF 2611L - TVA CELE FR 63430006643

Sources:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 7.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

CHEMTALL INCORPORATED
 TEL: (912) 884-3366 • FAX: (912) 884-5031

DATE	NUMBER
09/28/98	114500
DATE SHIPPED	ASSOCIATED NUMBER
09/28/98	66252

CUSTOMER NO.
695021

Customer
 S O L D T O
 ONE AUSTRALIA PTY LTD.
 UNIT 4
 168 BALCATT ROAD
 BALCATT, ..
 WEST AUSTRALIA 6021

Shipped to
 S H I P T O
 BUCKMAN LABORATORIES
 C/O MAINFRT. DISTRIBUTION
 48 MCALPINE STREET
 SOCKBURN, CHRISTCHURCH, NEW ZEALAND

CUSTOMER ORDER NUMBER	F.O.B.	FREIGHT CHARGES	SHIPPED VIA	SALES AGENT	TERMS
98/09/07	CHRISTCHURCH	CIF	TARONGO	695	NET 60 DAYS

UNITS	PACKAGE	DESCRIPTION	TOTAL QUANTITY	UNIT PRICE	AMOUNT
1	1050KTOTE	FLOERGER EM 240 L FLOERGER EM-240L LOT NUMBER F573HO	1050	2.7500	2887.50
		CTL 092234			
		MERCH TOTAL			2887.50
		WE APPRECIATE YOUR BUSINESS, THANK YOU			

PLEASE REMIT TO: **CHEMTALL INCORPORATED**
 P.O. BOX 930350
 ATLANTA, GEORGIA 31193

TOTAL AUS 2887.50

PLEASE PAY THIS AMOUNT

SUBJECT TO TERMS AND CONDITIONS ON REVERSE SIDE

Source:

(1) Schroeter, Russell H. (14 August 2008). "Affidavit of Russell Henry Schroeter," Electronic Exhibits.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

CHEMTALL INCORPORATED

TEL: (912) 884-3366 • FAX: (912) 884-5031

CUSTOMER NO.	DATE	NUMBER
695021	10/08/98	115196
Customer	DATE SHIPPED	ASSOCIATED NUMBER
SNF AUSTRALIA PTY LTD UNIT 4 168 BALCATT ROAD BALCATT, WEST AUSTRALIA 6021	10/08/98	66910
Shipped to	BUCKMAN LABORATORIES C/O MAINFRY DISTRIBUTION 48 MCALPINE STREET SOCKBURN, CHRIST CHURCH, NEW ZEALAND	

CUSTOMER ORDER NUMBER	F.O.B.	FREIGHT CHARGES	SHIPPED VIA	SALES AGENT	TERMS
98/09/16	CHRISTCHURCH	CIF	TAGUE	695	NET 60 DAYS

UNITS	PACKAGE	DESCRIPTION	TOTAL QUANTITY	UNIT PRICE	AMOUNT
1	1050KTOTE	FLOERGER EM 240 L FLOERGER EM-240L LOT NUMBER C173JO	1050	2.7500	2887.50
		CTL 100222			
MERCH TOTAL					2887.50
WE APPRECIATE YOUR BUSINESS, THANK YOU					
REMIT TO: CHEMTALL INCORPORATED P.O. BOX 930350 ATLANTA, GEORGIA 31193				TOTAL	AUS 2887.50

SUBJECT TO TERMS AND CONDITIONS ON REVERSE SIDE PLEASE PAY THIS AMOUNT

Source:

(1) Schroeter, Russell H. (14 August 2008). "Affidavit of Russell Henry Schroeter," Electronic Exhibits.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

CHEMTALL INCORPORATED

TEL: (912) 884-3366 • FAX: (912) 884-5031

DATE	NUMBER
12/03/98	117886
DATE SHIPPED	ASSOCIATED NUMBER
12/03/98	69069

CUSTOMER NO. 699021

Customer → SNF AUSTRALIA PTY LTD.
 UNIT 4
 148 BALCATT ROAD
 BALCATT,
 WEST AUSTRALIA 6021

Shipped to → BUCKMAN LABORATORIES
 C/O HAINERT DISTRIBUTION
 48 MCALPINE STREET
 SOCKBURN, CHRIST.. ..
 CHURCH, NEW ZEALAND

CUSTOMER ORDER NUMBER	F.O.B.	FREIGHT CHARGES	SHIPPED VIA	SALES AGENT	TERMS
98/11/08	CHRISTCHURCH	CIF	TAMPA	695	NET 60 DAYS
UNITS	PACKAGE	DESCRIPTION	TOTAL QUANTITY	UNIT PRICE	AMOUNT
2	1050KTOTE	FLOERGER EM 240 L FLOERGER EM-240L LOT NUMBER C766L0	2100	2.7500	5775.00
CTL 112448					
MERCH TOTAL					5775.00
WE APPRECIATE YOUR BUSINESS, THANK YOU					
PLEASE REMIT TO: CHEMTALL INCORPORATED P.O. BOX 930350 ATLANTA, GEORGIA 31193				TOTAL	AUS 5775.00

SUBJECT TO TERMS AND CONDITIONS ON REVERSE SIDE

PLEASE PAY THIS AMOUNT →

Source:

(1) Schroeter, Russell H. (14 August 2008). "Affidavit of Russell Henry Schroeter," Electronic Exhibits.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 150322 **Invoice Date: 1998**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: SCAC
Freight: CPT MELBOURNE AIRPORT
Delivery: NA

Payment: BANK TRANSFER AT RECEIPT

P.O. PO 98/03/23

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	1,000	3.740 AUD	3,740.00
	FO 4290 SC BUCKMAN			
	GOODS OF FRENCH ORIGIN			
	Net Weight: 1,000			
	Gross Weight: 1,040			
	2 BOX PALLETS			

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 150735 **Invoice Date: 1998**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: QUALITAIR
Freight: CPT MELBOURNE AIRPORT
Delivery: NA

SNF AUSTRALIA PTY LTD
↑
Customer

Payment: BANK TRANSFER AT RECEIPT

P.O. PO 98/03/24

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371 FO 4290 SC BUCKMAN	3,750	3.740 AUD	14,025.00

GOODS OF FRENCH ORIGIN

Net Weight: 3,750

Gross Weight: 3,900

5 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 151955 **Invoice Date: 1998**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: SCAC
Freight: CIF MELBOURNE
Delivery: NA

SNF AUSTRALIA PTY LTD
↑
Customer

Payment: BANK TRANSFER AT RECEIPT

P.O. PO 98/04/01

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	15,000	3.740 AUD	56,100.00
	FO 4290 SC BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

20 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 154165 **Invoice Date: 1998**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: SCAC
Freight: CIF MELBOURNE
Delivery: NA

Payment: BANK TRANSFER AT RECEIPT

P.O. PO 98/05/17

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	15,000	3.740 AUD	56,100.00
	FO 4290 SC BUCKMAN			
GOODS OF FRENCH ORIGIN				
	Net Weight: 15,000			
	Gross Weight: 15,600			
	20 BIG BAGS			

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 172116 **Invoice Date: 1999**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: NA

Payment: BANK TRANSFER AT RECEIPT

P.O. 99/03/16

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	4,500	4.110 AUD	18,495.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

10 BOX PALLETS / 10 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 173831

Invoice Date: 1999

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: NOTIFY: P. HODDER & ASSOCIATES UNIT 4
LEVEL 3, 14 QUEENS ROAD MELBOURNE,
VIC. 3004 AUSTRALIA

Customer: SNF AUST

SNF AUSTRALIA PTY LTD

Carrier: CANMAR
Freight: CIF PERTH/fremantle
Delivery: NA

↑
Customer

Payment: BANK TRANSFER AT RECEIPT

P.O. 99/04/03

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,000	4.110 AUD	12,330.00
	FO 4290 PGT BUCKMAN			

NOOSA / GOODS OF FRENCH ORIGIN - CHEMICAL PRODUCT NOT DANGEROUS.

Net Weight: 14,950
Gross Weight: 15,570
14 BIG BAGS / 5 BOX PALLETS 10 BAGS / 2 DRUMS

Proposed CUP
designated on
product
description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 175579 **Invoice Date: 1999**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: NA

Payment: BANK TRANSFER AT RECEIPT

P.O. 99/05/02

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,000	4.110 AUD	12,330.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 13,500

Gross Weight: 14,060

20 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 179686 **Invoice Date: 1999**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFER AT RECEIPT

P.O. 99/07/05

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,000	4.110 AUD	12,330.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 14,850

Gross Weight: 15,460

16 PALLETS / 4 PAILS 4 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 180971 **Invoice Date: 1999**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RDMELBOURNE VIC
3004 AUSTRALIA

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFER AT RECEIPT

P.O. 99/07/17

Customer: SNF AUST
SNF AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371 FO 4290 PGI BUCKMAN	3,000	4.110 AUD	12,330.00

GOODS OF FRENCH ORIGIN
Net Weight: 15,000
Gross Weight: 15,600
14 PALLETS / 6 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 182707 **Invoice Date: 1999**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RDMELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFER AT RECEIPT

P.O. 99/08/22

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	4,500	3.740 AUD	16,830.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

14 PALLETS / 6 BIG BAGS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 184528 Invoice Date: 1999

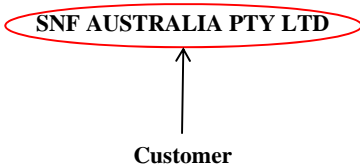
Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT Customer: SNF AUST
 SQUARE T.PARK DRIVETULLAMARINE
 MELBOURNE 3043

Carrier: CANMAR
 Freight: CIF MELBOURNE
 Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 99/09/09



LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	4,500	3.740 AUD	16,830.00
	FO 4290 PGT BUCKMAN			

GOODS OF FRENCH ORIGIN
 Net Weight: 15,000
 Gross Weight: 15,600
 12 PALLETS / 8 BIG BAGS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 185118 **Invoice Date: 1999**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT
SQUARE T.PARK DRIVETULLAMARINE
MELBOURNE 3043 **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 99/09/30

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,000	3.740 AUD	11,220.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

20 PALLETS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 188012 **Invoice Date: 1999**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT
SQUARE T.PARK DRIVETULLAMARINE
MELBOURNE 3043 **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 99/10/04

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	4,500	3.740 AUD	16,830.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 14,725

Gross Weight: 15,310

8 PALLETS / 14 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 188356 **Invoice Date: 1999**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT
SQUARE T.PARK DRIVETULLAMARINE
MELBOURNE 3043 **Customer: SNF AUST**

Carrier: WATSON BROWN
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 99/11/15

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,000	3.740 AUD	11,220.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

16 PALLETS / 4 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 188413 **Invoice Date: 1999**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT PO BOX 752 UNIT 3 INT **Customer: SNF AUST**
 SQUARE T.PARK DRIVETULLAMARINE
 MELBOURNE 3043

Carrier: WATSON BROWN
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFER AT RECEIPT

P.O. 99/11/14

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,000	3.740 AUD	11,220.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

3 PALLETS / 17 BIG BAGS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 191772 **Invoice Date: 2000**

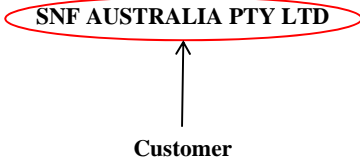
Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT **Customer: SNF AUST**
 SQUARE T.PARK DRIVETULLAMARINE
 MELBOURNE 3043

Carrier: WATSON BROWN
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/01/06



LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	5,250	3.740 AUD	19,635.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 14,700

Gross Weight: 15,520

7 BIG BAGS / 4 CONTAINERS7 PALLETS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 196305 **Invoice Date: 2000**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT
SQUARE T.PARK DRIVETULLAMARINE
MELBOURNE 3043 **Customer: SNF AUST**

Carrier: A P L
Freight: CIF MELBOURNE
Delivery: STANDARD

SNF AUSTRALIA PTY LTD
↑
Customer

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/03/14

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,000	3.740 AUD	11,220.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN
Net Weight: 15,000
Gross Weight: 15,600
16 BIG BAGS / 4 PALLETS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 196419 **Invoice Date: 2000**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT
SQUARE T.PARK DRIVETULLAMARINE
MELBOURNE 3043 **Customer: SNF AUST**

Carrier: A P L
Freight: CIF MELBOURNE
Delivery: STANDARD

SNF AUSTRALIA PTY LTD
↑
Customer

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/03/03

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	1,500	3.740 AUD	5,610.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN
Net Weight: 15,000
Gross Weight: 15,600
15 BIG BAGS /5 PALLETS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 197360 **Invoice Date: 2000**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT
SQUARE T.PARK DRIVETULLAMARINE
MELBOURNE 3043 **Customer: SNF AUST**

Carrier: A P L
Freight: CIF MELBOURNE
Delivery: ASAP

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/03/19

SNF AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,000	3.740 AUD	11,220.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN
Net Weight: 15,000
Gross Weight: 15,600
18 BIG BAGS/2 PALLETS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 199116 **Invoice Date: 2000**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT
SQUARE T.PARK DRIVETULLAMARINE
MELBOURNE 3043 **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/04/10

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	1,500	3.990 AUD	5,985.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

15 BIG BAGS / 5 PALLETS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 203128 **Invoice Date: 2000**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT
SQUARE T.PARK DRIVETULLAMARINE
MELBOURNE 3043 **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/05/16

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	7,500	3.990 AUD	29,925.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

18 BIG BAGS/2 PALLETS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 206098 **Invoice Date: 2000**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT
SQUARE T.PARK DRIVETULLAMARINE
MELBOURNE 3043 **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/06/13

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	7,500	3.990 AUD	29,925.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

20 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 210701 **Invoice Date: 2000**

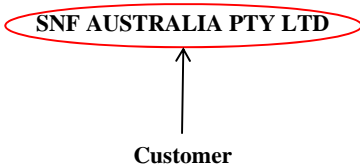
Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: **Customer: SNF AUST**
 UTI PO BOX 752UNIT 3 INT SQUARE T.PARK
 DRIVETULLAMARINE MELBOURNE 3043

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/08/22



LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	2,250	3.990 AUD	8,977.50
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN
 Net Weight: 14,700
 Gross Weight: 15,270
 18 BIG BAGS/3 PALLETS/2 PAILS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 214170 Invoice Date: 2000

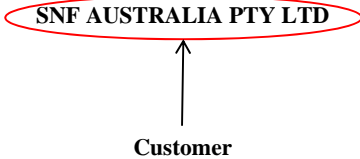
Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT SQUARE T.PARK DRIVETULLAMARINE MELBOURNE 3043 Customer: SNF AUST

Carrier: CANMAR
 Freight: CIF MELBOURNE
 Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/10/10



LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	6,000	3.990 AUD	23,940.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 14,850

Gross Weight: 15,450

8 PALLETS / 12 BIG BAGS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 215029 **Invoice Date: 2000**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT
SQUARE T.PARK DRIVETULLAMARINE
MELBOURNE 3043 **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/11/11

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	7,500	4.210 AUD	31,575.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 14,950

Gross Weight: 15,260

7 PALLETS/15 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 218300 Invoice Date: 2001

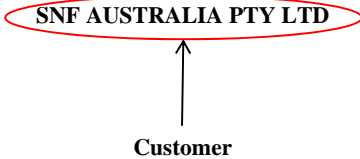
Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT Customer: SNF AUST
 SQUARE T.PARK DRIVETULLAMARINE
 MELBOURNE 3043

Carrier: CANMAR
 Freight: CIF MELBOURNE
 Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/12/16



LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	8,250	4.210 AUD	34,732.50
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 14,850

Gross Weight: 15,560

2 CONTAINERS / 17 BIG BAGS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 218300 Invoice Date: 2001

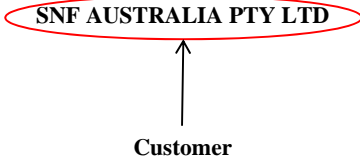
Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: UNION TRANSPORT(PO BOX 752UNIT 3 INT Customer: SNF AUST
 SQUARE T.PARK DRIVETULLAMARINE
 MELBOURNE 3043

Carrier: CANMAR
 Freight: CIF MELBOURNE
 Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 00/12/16



LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	750	4.210 AUD	3,157.50
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN
 Net Weight: 14,850
 Gross Weight: 15,560
 2 CONTAINERS / 17 BIG BAGS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 221928 **Invoice Date: 2001**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4
 LEVEL 3, 14 QUEENS ROAD MELBOURNE VIC
 3004 AUSTRALIA **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: URGENT

Payment: BANK TRANSFER AT RECEIPT

P.O. 35826

SNF AUSTRALIA PTY LTD
 ↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	2,250	4.330 AUD	9,742.50
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN
 Net Weight: 15,300
 Gross Weight: 15,960
 3 BIG BAGS / 1 CONTAINER 16 PALLETS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 224489 **Invoice Date: 2001**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE 3004,
VICTORIA

Customer: SNF AUST

SNF AUSTRALIA PTY LTD

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

↑
Customer

Payment: BANK TRANSFER AT RECEIPT

P.O. 38411

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,750	4.340 AUD	16,275.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 14,850

Gross Weight: 15,440

16 PALLETS / 5 BIG BAGS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 224490 **Invoice Date: 2001**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RDMELBOURNE 3004,
VICTORIA

Customer: SNF AUST

SNF AUSTRALIA PTY LTD

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

↑
Customer

Payment: BANK TRANSFER AT RECEIPT

P.O. 42429

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	6,000	4.340 AUD	26,040.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

14 BIG BAGS/6 PALLETS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 231372 **Invoice Date: 2001**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE 3004,
VICTORIA **Customer: SNF AUST**

Carrier: CANMAR **SNF AUSTRALIA PTY LTD**
Freight: CIF MELBOURNE ↑
Delivery: STANDARD **Customer**

Payment: BANK TRANSFER AT RECEIPT

P.O. 39933

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	7,500	4.340 AUD	32,550.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 14,700

Gross Weight: 15,310

6 PALLETS/ 14 BIG BAGS/8 PAILS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 232067 **Invoice Date: 2001**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE 3004,
VICTORIA **Customer: SNF AUST**

Carrier: CANMAR **SNF AUSTRALIA PTY LTD**
Freight: CIF MELBOURNE ↑
Delivery: STANDARD **Customer**

Payment: BANK TRANSFER AT RECEIPT

P.O. 11078

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,750	4.340 AUD	16,275.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

1 TC 205 BIG BAGS / 16 PALLETSCSQU 314 379/4

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
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Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 235785 **Invoice Date: 2001**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE 3004,
VICTORIA **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFER AT RECEIPT

P.O. 45838

SNF AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	15,000	4.340 AUD	65,100.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

20 BIG BAGS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 238934 **Invoice Date: 2001**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: MC HUGH & EASTWOOD PTY LTD185
MALOP STREET, GEELONGVICTORIA 3220,
AUSTRALIA **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFERAT RECEIPT

P.O. 38595

SNF AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	10,500	4.340 AUD	45,570.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN
Net Weight: 15,000
Gross Weight: 15,600
17 BIG BAGS / 3 PALLETS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 702290 **Invoice Date: 1998**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: SCAC **SNF AUSTRALIA PTY LTD**
Freight: CPT MELBOURNE AIRPORT ↑
Delivery: NA **Customer**

Payment: FREE SAMPLES INVOICE WITHOUT PAYMENT

P.O. PO 98/03/23

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	1,000	0.000 AUD	0.00
	FO 4290 SC BUCKMAN			
	GOODS OF FRENCH ORIGIN			
	Net Weight: 1,000			
	Gross Weight: 1,040			
	2 BOX PALLETS			

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 702394 **Invoice Date: 1998**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: QUALITAIR
Freight: CPT MELBOURNE AIRPORT
Delivery: NA

SNF AUSTRALIA PTY LTD
↑
Customer

Payment: FREE SAMPLES INVOICE WITHOUT PAYMENT

P.O. PO 98/03/24

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	BUFLOC 5371	3,750	0.000 AUD	0.00
	FO 4290 SC BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight:	3,750	Proposed CUP designated on product description.
Gross Weight:	3,900	
5 BIG BAGS		

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 143898 **Invoice Date: 1997**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: **Customer: SNF AUST**

PETTER HODDER & ASSOCIATES

SNF AUSTRALIA PTY LTD

Carrier: CARGA
Freight: CIF MELBOURNE
Delivery: NA

↑
Customer

Payment: BANK TRANSFERAT RECEIPT

P.O. 97/11/13

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	CG445	7,500	3.740 AUD	28,050.00
	FO 4290 SH BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 15,000

Gross Weight: 15,600

20 BIG BAGS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
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Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 177059 **Invoice Date: 1999**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: CANMAR
Freight: CIF MELBOURNE
Delivery: STANDARD

Payment: BANK TRANSFER AT RECEIPT

P.O. 99/05/16

SNF AUSTRALIA PTY LTD

↑

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	FO 4290 SC BUCKMAN	4,500	4.110 AUD	18,495.00
	FO 4290 PGI BUCKMAN			

GOODS OF FRENCH ORIGIN

Net Weight: 14,950

Gross Weight: 15,570

10 BIG BAGS / 9 PALLETS 2 DRUMS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 136012

Invoice Date: 1997

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent:

P.HODDER & ASSOCIATES UNIT 4LEVEL 3,14
QUEENS ROADMELBOURNE VICTORIA 3004

Customer: SNF AUST

SNF AUSTRALIA PTY LTD

Carrier: EMERY
Freight: CFR MELBOURNE AIRPORT
Delivery: NA

Customer

Payment: BANK TRANSFERAT RECEIPT

P.O. 97/06/04A

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	INCONNU FO 4290 SC BUCKMAN	4,000	14.000 FRF	56,000.00

GOODS OF FRENCH ORIGIN

Net Weight: 4,000

Gross Weight: 4,160

4 BOX PALLETS

**Proposed CUP
designated on
product
description.**

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 142717 Invoice Date: 1997

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: Customer: SNF AUST
 PETTER HODDER & ASSOCIATES

Carrier: SCAC
 Freight: C & F MELBOURNE AIRPORT
 Delivery: NA

Payment: BANK TRANSFERAT RECEIPT

P.O. 97/11/12

Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	INCONNU FO 4290 SH BUCKMAN	6,000	3.740 AUD	22,440.00

GOODS OF FRENCH ORIGIN
 Net Weight: 6,000
 Gross Weight: 6,240
 8 BOX PALLETS

Proposed CUP designated on product description.

Notes:

- /1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.
- /2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 145198 Invoice Date: 1998

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES Customer: SNF AUST

Carrier: DUBOIS

Freight: C & F MELBOURNE AIRPORT

Delivery: NA

Payment: BANK TRANSFERAT RECEIPT

P.O. 97/11/14



LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	INCONNU FO 4290 SH BUCKMAN	2,500	3.740 AUD	9,350.00

GOODS OF FRENCH ORIGIN

Net Weight: 2,500

Gross Weight: 2,600

3 BOX PALLETS

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

Invoices and Invoice Summaries of all Purchases by SNF AUSTRALIA Designated For/Shipped to a Proposed CUP Company in Australia

SNF Manufacturer: SNF FLOERGER

Invoice Number: 149230 **Invoice Date: 1998**

Delivery Address: SNF AUSTRALIA PTY LTD

Forwarding Agent: PETER HODDER & ASSOCIATES UNIT 4,
LEVEL 3, 14 QUEENS RD MELBOURNE VIC
3004 AUSTRALIA **Customer: SNF AUST**

Carrier: SCAC
Freight: CIF MELBOURNE
Delivery: NA

SNF AUSTRALIA PTY LTD
↑
Customer

Payment: BANK TRANSFER AT RECEIPT

P.O. PO 98/02/06

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	INCONNU FO 4290 SC BUCKMAN	15,000	3.740 AUD	56,100.00
	GOODS OF FRENCH ORIGIN			
	Net Weight: 15,000			
	Gross Weight: 15,600			
	20 BIG BAGS			

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Table 7:

a

SNF Manufacturer: SNF FLOERGER
Invoice Number: 701223 **Invoice Date:** 1998
Delivery Address: SNF AUSTRALIA PTY LTD
Forwarding Agent: PETER HODDER & ASSOCIATES **Customer:** SNF AUST
Carrier: DUBOIS
Freight: C & F MELBOURNE AIRPORT
Delivery: NA
Payment: FREE SAMPLES INVOICE WITHOUT PAYMENT
P.O.: 97/11/14

SNF AUSTRALIA PTY LTD
↑
Customer

LINE	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
/2/	INCONNU FO 4290 SH BUCKMAN	2,500	0.000 AUD	0.00
GOODS OF FRENCH ORIGIN				
	Net Weight: 2,500			
	Gross Weight: 2,600			
	3 BOX PALLETS			

Proposed CUP designated on product description.

Notes:

/1/: This template illustrates data in a similar format to SNF FRANCE invoices. However, the taxpayer did not provide all the invoice information. As such, I have only filled in the fields where information was provided and appeared accurate.

/2/: Only the identified transaction designated for a proposed CUP is shown in this template invoice. That is, other transactions may have also been part of this invoice, but I have not shown them to simplify this illustration.

Source:

(1) Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.

Second Statement of Brian C. Becker

APPENDICES

Second Statement of Brian C. Becker

APPENDIX A



PRECISION ECONOMICS, LLC
1901 PENNSYLVANIA AVE NW, SUITE 200
WASHINGTON, DC 20006
TEL. (202) 530-1113
FAX. (202) 530-1144
brian@precisionecon.com

BRIAN C. BECKER, Ph.D.

EDUCATION

The Wharton School of the University of Pennsylvania, Philadelphia, PA

- Ph.D., Applied Economics (1993)
- M.A., Applied Economics (1991)

The Johns Hopkins University, Baltimore, MD

- B.A., Applied Mathematics and Economics (1988)

PRESENT POSITION

PRECISION ECONOMICS, LLC, Washington, DC, 2001 - present
President and CEO

- Prepared more than 250 transfer pricing reports for taxpayers, the IRS, the Australian Taxation Office, and other tax authorities on a variety of issues, including tangible property, cost sharing, intangible property, intercompany loans, guarantee fees, and service fees.
- Served as a lead transfer pricing economic expert for the IRS in the largest transfer pricing dispute and settlement on record, GlaxoSmithKline Holdings (Americas) v. Commissioner of Internal Revenue, in which Glaxo paid \$3.4 billion.
- Served as an economic expert witness in the first major transfer pricing litigation in Australia--providing direct and cross examination testimony in support of a written expert report in Roche Products Pty. Ltd. vs. Federal Commissioner of Taxation.
- Provided testimony and economic reports involving catfish, various steel products, and pineapples in hearings before the U.S. International Trade Commission.
- Determined lost sales and profits to a retailer damaged by the 9/11 disaster, in an expert report and in oral testimony before an arbitration panel.
- Provided written and oral expert valuation testimony in U.S. Tax Court involving minority interests in a privately held publishing business.
- Submitted an economic expert report and provided testimony in an intellectual property and business valuation dispute before Delaware Chancery Court.
- Submitted economic expert witness affidavits in investor class action litigation involving the specialists of the New York Stock Exchange.

EXPERT TESTIMONY, SUBMISSIONS AND HEARINGS

"Damages Rebuttal Expert Report," United States District Court, Southern District of Florida, Case No. 07-80826, June 16, 2008, Deposition Testimony, Washington, DC, June 27, 2008.

"Statement of Brian C. Becker," Roche Products Pty. Ltd. vs. Federal Commissioner of Taxation, Administrative Appeals Tribunal, Taxation Appeals Division, New South Wales District Registry,



PRECISION ECONOMICS, LLC
1901 PENNSYLVANIA AVE NW, SUITE 200
WASHINGTON, DC 20006
TEL. (202) 530-1113
FAX. (202) 530-1144
brian@precisionecon.com

BRIAN C. BECKER, Ph.D.

NO NT7 AND NT56-65 OF 2005, August 30, 2007, Direct and Cross Examination Testimony, Sydney, Australia, February 20-21, 2008.

“Leslie J. Leff et. al., v. Morgan Lewis & Bockius, LLP: Valuation Expert Report”, JAMS Arbitration Hearing, March 15, 2007, Direct and Cross Examination Testimony, Philadelphia, PA, April 19, 2007.

“Assessing the Impact of Revoking Antidumping Orders on Canned Pineapple Fruit from Thailand on the Domestic Industry,” in Canned Pineapple Fruit from Thailand, Investigations No. 731-TA-706 (Second Review), United States International Trade Commission, with A. Parsons, January 5, 2007.

“Affidavit of Brian C. Becker, Ph.D. in Support of Plaintiffs’ Initial Discovery Plan,” in CALIFORNIA PUBLIC EMPLOYEES’ RETIREMENT SYSTEM, On Behalf of Itself and All Others Similarly Situated vs. THE NEW YORK STOCK EXCHANGE, INC., et. al., United States District Court, Southern District of New York, Civil Action No. 03-CV-9968-UA, May 23, 2006.

“Affidavit of Brian C. Becker” and “Economic Analysis of Sales Dispersion And “Make-Up” Sales,” in Re Appraisal Between, DUANE READE, INC., and ST. PAUL FIRE AND MARINE INSURANCE COMPANY, December 16, 2004, Appraisal Panel Hearing, Direct and Cross Examination Testimony, April 27, 2005.

“The Steel Industry: An Automotive Supplier Perspective,” in Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from Brazil, Japan, and Russia, Investigations Nos. 701-TA-384 and 731-TA-806-808 (Review), United States International Trade Commission, Testimony at Hearing, March 2, 2005.

“Affidavit of Brian C. Becker, Ph.D., Submitted in Support of Defendant’s Motion to Dismiss the Indictment and Inspect the Grand Jury Minutes,” in THE PEOPLE OF THE STATE OF NEW YORK, against THEODORE C. SIHPOL, Indictment No. 1710/2004, Supreme Court of the State of New York, County of New York, February 9, 2005.

“Fair Market Value Estimate of the But-For Commissions Earned by Maitake Products, Inc. from August 17, 2001 Through April 10, 2006,” in MAITAKE PRODUCTS, INC., AND SUN MEDICA CO., LTD., v. TRANS-HERBE, INC., Superior Court of New Jersey Law Division – Bergen County, Docket No: L-9476-02, December 10, 2004, Deposition Testimony, January 28, 2005.

“Economic Analysis of Colortyme’s Lost Profits,” in DL KING, LLC D/B/A COLORTYME, v. KEVIN COLEMAN AND ABC TELEVISION & APPLICANCE RENTAL, INC., D/B/A PRIME TIME RENTALS, Circuit Court of Halifax County, Virginia, Case No. CH02000102-00, August 18, 2004.

“Affidavit of Brian C. Becker,” in KEITH PARKS, et. al., Individually, and on Behalf of Others Similarly Situated, v. GOLD KIST, INC., et. al., Superior Court of Dekalb County, Georgia, Civil Action Case No. 04-CV-7263-4, August 10, 2004, Deposition Testimony, August 24, 2004.

“Punitive Damages Report,” in KATHLEEN McCORMACK et al. v. WYETH et al., Superior Court of the District of Columbia, Civil Case No. 02-CA-6082, Deposition Testimony, May 20, 2004.



PRECISION ECONOMICS, LLC
1901 PENNSYLVANIA AVE NW, SUITE 200
WASHINGTON, DC 20006
TEL. (202) 530-1113
FAX. (202) 530-1144
brian@precisionecon.com

BRIAN C. BECKER, Ph.D.

“Third Affidavit of Brian C. Becker, Ph.D.,” in CALIFORNIA PUBLIC EMPLOYEES’ RETIREMENT SYSTEM, On Behalf of Itself and All Others Similarly Situated vs. THE NEW YORK STOCK EXCHANGE, INC., et. al., United States District Court, Southern District of New York, Civil Action No. 03-CV-9968-UA, April 6, 2004.

“Second Affidavit of Brian C. Becker, Ph.D.,” in CALIFORNIA PUBLIC EMPLOYEES’ RETIREMENT SYSTEM, On Behalf of Itself and All Others Similarly Situated vs. THE NEW YORK STOCK EXCHANGE, INC., et. al., United States District Court, Southern District of New York, Civil Action No. 03-CV-9968-UA, January 16, 2004.

“Affidavit of Brian C. Becker, Ph.D.,” in CALIFORNIA PUBLIC EMPLOYEES’ RETIREMENT SYSTEM, On Behalf of Itself and All Others Similarly Situated vs. THE NEW YORK STOCK EXCHANGE, INC., et. al., United States District Court, Southern District of New York, Civil Action No. 03-CV-9968-UA, January 6, 2004.

“Assessing the Impact of Imported Frozen Basa and Tra Fillets from Vietnam on the U.S. Frozen Catfish Fillet Industry,” United States International Trade Commission, Inv. No. 731-TA-1012 (Final, with A. Salzberg), submitted June 11, 2003, Testimony at Hearing, June 17, 2003.

“Valuation of Estate of Josephine Thompson’s Shares in Thomas Publishing Company as of May 2, 1998,” submitted February 14, 2003 and “Rebuttal Valuation of Estate of Josephine Thompson’s Shares in Thomas Publishing Company,” submitted May 27, 2003 in Estate of Josephine T. Thompson v. Commissioner of Internal Revenue, U.S. Tax Court, No. 4939-02. Direct and Cross Examination Testimony, New York, NY, June 4-5, 2003.

“Analysis of Xentex’s Expenses,” in Xentex Technologies, Inc., Chapter 11 Reorganization, Motion of TMB, LLC for an Order Appointing a Chapter 11 Trustee, United States Bankruptcy Court for the Northern District of Illinois Eastern Division, Deposition Testimony, April 23, 2003.

“Insolvency Analysis Regarding Xentex Technologies, Inc. as of February 7, 2003,” in Xen Investors, LLC v. Xentex Technologies, Inc., C.A. NO. 19713 NC In the Court of Chancery for the State of Delaware in and for New Castle County, Report Submitted February 7, 2003; Deposition Testimony February 27, 2003; Direct and Cross Examination Testimony, March 4, 2003.

“Economic Testimony,” United States International Trade Commission, Inv. Nos. 731-TA-986 and 987 (Final), Testimony at Hearing, November 22, 2002.

“The State of Venture Capital Investment in the U.S. Telecommunications Sector,” White Paper Submission to the Federal Communications Commission Regarding Spectrum Auction 46, Washington, DC, September 20, 2002.

“Economic Damages Report,” *In: Jerry Brown vs. Education Services International*, Judicial Arbitration and Mediation Services, Inc. (JAMS) Arbitration, Washington, DC, April 4, 2002 (written testimony).

“Economic Testimony,” United States International Trade Commission, Inv. Nos. 731-TA-986 and 987 (P), Testimony at Hearing, December 17, 2001.

“COMPAS Economic Analysis of Various Quota Remedies for Hot Bar/Light Shaped Steel, Rebar, and Welded Tubular Products (Products 9, 11, and 20),” United States International Trade



BRIAN C. BECKER, Ph.D.

Commission, Inv. No. TA-201-73, Pre-hearing report filed October 29, 2001, Testimony at Hearing, November 8, 2001, Post-hearing report filed November 14, 2001.

“Expert Report of Brian C. Becker, Ph.D.,” *In: Muze, Inc. vs. Alliance Entertainment Corp; Matrix Software, Inc., and Eric Weisman; and Michael Erlewine; and Does 1 through 10, inclusive*, March 2, 2001, United States District Court, Central District of California, Western Division, Case No. 00 – 00620 RSWL (CWx), Deposition Testimony, April 3, 2001.

“Economic Expert Report *In: William A. Clutter d/b/a BC Transportation Consultants, Petitioner v. Transportation Services Authority of Nevada, Respondent*,” December 11, 2000, District Court, Clark County, Nevada, Case No. A387827, Dept. No. VII, Docket No. P. (written report and affidavit).

“Economists’ Expert Report on Uzbekistan Imports, An Economic Assessment of the Impact of Termination of the Investigation of Uranium Imports from Uzbekistan,” United States International Trade Commission, Inv. Nos. 731-TA-539-C, E and F (Review), Report filed June 5, 2000, Testimony at Hearing, June 13, 2000 (with A. Wechsler).

Economic Witness on Uranium from Kazakhstan, United States International Trade Commission, Inv. No. 731-TA-539-A (Final), United States International Trade Commission, Testimony at Hearing, June 9, 1999 (with A. Wechsler).

“Expert Report In the Matter of Dumped Certain Prepared Baby Foods Originating in or Exported from The United States of America,” The Canadian International Trade Tribunal Public Interest Inquiry No. PB-98-001, August 10, 1998. Direct and Cross Examination Testimony, September 15, 1998.

Economic Witness on Changed Circumstances Review for Titanium Sponge from Japan, Kazakhstan, Russia, and Ukraine, United States International Trade Commission, Testimony at Hearing, June 8, 1998.

Witness on Economic Methodologies Panel for Proposed Amendments to Rules of Practice and Procedure; Five-Year Reviews, United States International Trade Commission, Testimony at Hearing, February 26, 1998.

“An Economic Analysis of the Compensation paid to Executives of the Dexsil Corporation 1989-1990,” executive compensation case # 1349-93, United States Tax Court, June 8, 1994 (with G. Godshaw).

PUBLISHED PAPERS AND BOOK CHAPTERS

- 1) “Projected and Actual Profits’ Impact on Licensees,” *Tax Management Transfer Pricing Report*, Vol. 17, No. 11, October 9, 2008, pp. 461-466.
- 2) “The Economics of Cost Sharing Buy-Ins: Questions and Answers,” *Tax Management Transfer Pricing Report*, Vol. 16, No. 24, April 24, 2008, pp. 950-953.
- 3) “Benchmarking Manufacturing or Distribution Entities Against the Profits of Consolidated Companies,” *Tax Management Transfer Pricing Report*, Vol. 13, No. 5, July 7, 2004, pp. 236-237.



BRIAN C. BECKER, Ph.D.

- 4) "An Examination of Goodwill Valuation Methodologies," *Corporate Governance Advisor*, Vol. 10, No. 4, July/August 2002, pp. 35-40 (with M. Riedy and K. Sperduto).
- 5) "Comparable Profits Method: Accounting for Margin and Volume Effects of Intangibles," *Tax Management Transfer Pricing Report*, Vol. 10, No. 19, February 6, 2002, pp. 831-833.
- 6) "Cost Sharing Buy-Ins" Chapter in *Transfer Pricing Handbook*, 3rd Edition, and *Transfer Pricing International*, edited by Robert Feinschreiber, John Wiley & Sons, 2002, pp. A-3 - A-16.
- 7) "Cost Sharing Buy-Ins," *Corporate Business Taxation Monthly*, Vol. 3, No. 3, December 2001, pp. 26-35.
- 8) "Further Thoughts on Cost Sharing Buy-Ins: A Review of the Market Capitalization and Declining Royalty Methods," *Tax Management Transfer Pricing Report*, Vol. 10, No. 6, July 11, 2001, pp. 195-197.
- 9) "Valuing In-Process R&D for Acquisitions: Economic Principles Applied to Accounting Definitions," *Tax Management Transfer Pricing Report*, Vol. 9, No. 10, September 20, 2000, pp. 323-326.
- 10) "Should a Blockage Discount Apply? Perspectives of Both A Hypothetical Willing Buyer and A Hypothetical Willing Seller," *Business Valuation Review*, Vol. 19, No. 1, March 2000, pp. 3-9 (with G. Gutzler).
- 11) "Does a Small Firm Effect Exist when Using the CAPM? Not Since 1980 and Not when Using Geometric Means of Historical Returns," *Business Valuation Review*, Vol. 18, No. 3, September 1999, pp. 104-111 (with I. Gray).
- 12) "Transfer Pricing and Foreign Exchange Risk," *Tax Management Transfer Pricing Report*, Vol. 8, No. 6, July 14, 1999, pp. 251-256 (with M. Bajaj and J. Neuberger).
- 13) "The Control Premium: An Initial Look Into a Strict Monetary Value Approach," *Business Valuation Digest*, Vol. 5, No. 1, July 1999, pp. 12-15.
- 14) "Using Average Historical Data for Risk Premium Estimates: Arithmetic Mean, Geometric Mean, or Something Else?," *Business Valuation Review*, December 1998, Vol. 17, No. 4, pp. 136-140 (with I. Gray).
- 15) "The Cost of Carry: An Inflation Adjustment to Assure Consistent Real Profit Margins," *Tax Management Transfer Pricing Report*, Vol. 7, No. 17, December 23, 1998, pp. 639-643 (with B. Brooks).
- 16) "The Peculiar Market for Commercial Property: The Economics of 'Improving' a Rental Property," *The Southwestern Journal of Economics*, July 1998, Vol. II, No. 2, pp. 104-121.
- 17) "The Effects of Inflation on Cross-Country Profit Comparisons," *Tax Management Transfer Pricing Report*, Vol. 7, No. 3, June 3, 1998, pp. 77-82 (with B. Brooks).
- 18) "Quantifying Comparability for Applications in Economic Analysis: The Weighted Distance Method," *The Southwestern Journal of Economics*, Volume 2, Number 1, April 1997, pp. 128-141 (with K. Button).
- 19) "Minority Interests in Market Valuation: An Adjustment Procedure," *Business Valuation Review*, Volume 16, Number 1, March 1997, pp. 27-31.



PRECISION ECONOMICS, LLC
1901 PENNSYLVANIA AVE NW, SUITE 200
WASHINGTON, DC 20006
TEL. (202) 530-1113
FAX. (202) 530-1144
brian@precisionecon.com

BRIAN C. BECKER, Ph.D.

- 20) "Capital Adjustments: A Short Overview," *Tax Management Transfer Pricing Report*, Vol. 5, No. 19, January 29, 1997, pp. 613-619.
- 21) "Multiple Approaches to Valuation: The Use of Sensitivity Analysis," *Business Valuation Review*, Volume 15, Number 4, December 1996, pp. 157-160.
- 22) "The Robin Hood Bias: A Study of Biased Damage Awards," *The Journal of Forensic Economics*, Volume 9, No. 3, Fall 1996, pp. 249-259.
- 23) "Three Technical Aspects of Transfer Pricing Practice: Distinguishing Methods, Using Statistical Ranges, and Developing Data Sets," *Tax Management Transfer Pricing Report*, Vol. 5, No. 4, June 19, 1996, pp. 97-103.
- 24) "The Final Transfer Pricing Regulations: The More Things Change, the More they Stay the Same," *Tax Notes*, Volume 64, #4, pp. 507-523, 1994 (with G. Carlson, et. al.).
- 25) "Philadelphia's Luxury Hotels: Boom or Bust?," *The Cornell Hotel and Restaurant Administration Quarterly*, Volume 33, #2, pp. 33-42, 1992.

PROFESSIONAL SEMINARS

- "Economic Aspects of Transfer Pricing Principles," Speaker, CITE Conference on U.S. Transfer Pricing Planning and Controversies, Chicago, Illinois, November 2-3, 2009 (forthcoming).
- "Economic Aspects of Transfer Pricing Principles," Speaker, CITE Conference on U.S. Transfer Pricing Planning and Controversies, Houston, Texas, June 8-9, 2009 (forthcoming).
- "Fundamentals of Transfer Pricing," Conference Chair, IIR Seminar, London, UK, October 29, 2008.
- "Fundamentals of Transfer Pricing," Speaker on Transfer Pricing Methods, IIR Seminar, London, UK, June 11, 2008.
- "Transfer Pricing," Guest Lecturer at The George Washington University Law School, March 26, 2008.
- "Economics of Private Student Loans," Speaker on the 2008 National Council of Higher Education Loan Programs Leadership Conference: As the Dust Settles, Sarasota, FL, January 9, 2008.
- "Economists in Transfer Pricing: Intangibles, Audits, and APAs," Council for International Tax Education, Inc.: U.S. Transfer Pricing Planning and Controversies, Houston, TX, October 15, 2007.
- "New IRS Rules for Transfer Pricing of Services," Strafford Publications Teleconference Speaker on Methods and Services Sharing Agreements, July 10, 2007.
- "New IRS Rules for Transfer Pricing of Services," Strafford Publications Teleconference Speaker on Methods and Services Sharing Agreements, May 8, 2007.
- "Economists in Transfer Pricing: Intangibles, Audits, and APAs," Council for International Tax Education, Inc.: U.S. Transfer Pricing Planning and Controversies, Washington, DC, April 23, 2007.



PRECISION ECONOMICS, LLC
1901 PENNSYLVANIA AVE NW, SUITE 200
WASHINGTON, DC 20006
TEL. (202) 530-1113
FAX. (202) 530-1144
brian@precisionecon.com

BRIAN C. BECKER, Ph.D.

“Profitability and R&D for PhRMA,” Pharmaceutical Research and Manufacturers of America Conference, Charlottesville, VA, January 26, 2007.

“Economics of Mass Tort: Lead Paint,” Gerson Lehrman Group Seminar, New York, NY, November 16, 2005.

“Understanding the Issues Involved in the Valuation of Intangibles,” Transfer Pricing: Best Practices for Managing the Corporate Transfer Pricing Function, Infonex Seminar, San Francisco, CA, October 27, 2005.

“Maximizing Revenue, Minimizing Taxpayer Burden,” Emcee and Speaker for Discussion of “Revenue Matters,” National Press Club, Washington, DC, June 7, 2005.

“Intangible Valuation in Transfer Pricing,” Transfer Pricing Roundtable: Best in Class Practices for Companies, Infonex Seminar, New York, NY, May 25, 2005.

“Transfer Pricing Workshop,” Workshop Chair and Speaker, IIR Ltd., London, UK, April 25, 2005.

“The Steel Industry: An Automotive Supplier Perspective,” National Press Club, Washington, DC, February 16, 2005 (with Kevin Hassett.)

“Probability and Statistics,” Digital Sandbox Risk Analysis Seminar Series, Reston, Virginia, October 14, 2004.

“The Economics of Transfer Pricing: Independent Arm’s Length Analysis,” Council for International Tax Education: U.S. Transfer Pricing Planning & Controversies, New York, NY, August 16, 2004.

“Transfer Pricing Workshop,” Workshop Chair and Speaker, IIR Ltd., London, UK, April 21, 2004.

“Economists in Transfer Pricing: Independence, Methodologies, and Case Study,” Council for International Tax Education: U.S. Transfer Pricing 101, New York, NY, February 23, 2004.

“Profitability Analysis of NYSE Trading Specialists,” American Enterprise Institute Seminar Series, Washington, DC, October 8, 2003.

“Economists in Transfer Pricing: Independence, Cost Sharing, and CPM Volume Effects,” Council for International Tax Education: U.S. Transfer Pricing Planning & Compliance, New York, NY, August 18, 2003.

“Economists in Transfer Pricing: Profit Splits, Volume Effects, Cost Sharing, and Real Options,” Council for International Tax Education: U.S. Transfer Pricing Planning & Compliance, Washington, DC, May 6, 2003.

“Economists in Transfer Pricing: Profit Splits, Volume Effects, Cost Sharing, and Real Options,” Council for International Tax Education: U.S. Transfer Pricing Planning & Compliance, Dallas, TX, March 24, 2003.

“Topics in Transfer Pricing and Valuation,” Conference Chair, Discussion Topics “Cost Sharing Buy-In Valuations” and “Volume Effects of Intangibles,” Internal Revenue Service, Washington, DC, December 9-10, 2002.

“Economists in Transfer Pricing: Cost Sharing and Real Options,” Council for International Tax Education: U.S. Transfer Pricing Planning & Compliance, New York, NY, September 23, 2002.



PRECISION ECONOMICS, LLC
1901 PENNSYLVANIA AVE NW, SUITE 200
WASHINGTON, DC 20006
TEL. (202) 530-1113
FAX. (202) 530-1144
brian@precisionecon.com

BRIAN C. BECKER, Ph.D.

- “Valuation of Intangible Property and Cost Sharing Arrangements,” Economist Group of the Internal Revenue Service, San Francisco, CA, June 25, 2002.
- “Valuation of Intangible Property and Cost Sharing Arrangements,” Southeast Region of Internal Revenue Service, Atlanta, GA, May 10, 2002.
- “Economists in Transfer Pricing: CPM and Cost Sharing,” Council for International Tax Education: U.S. Transfer Pricing Planning & Compliance, Washington, DC, May 6-7, 2002.
- “Pricing Cost Sharing Buy-Ins and Other Intercompany Transfers,” Council for International Tax Education: U.S. Transfer Pricing Planning & Compliance, New York, NY, November 15-16, 2001.
- “Pricing Cost Sharing Buy-Ins and Other Intercompany Transfers,” ATLAS Intermediate U.S. International Tax Update, Cleveland, Ohio, November 5, 2001.
- “Cost Sharing Buy-Ins: Market Capitalization, Declining Royalty, and Other Methods,” Internal Revenue Service Annual Economist Convention, Washington, DC, July 25, 2001.
- “The Relative Values of Early and Late Stage Research & Development,” presentation to Shaw Pittman, McLean, Virginia, March 28, 2001.
- “Valuation Concepts in Family Limited Partnerships,” two hour presentation to Internal Revenue Service Northeast Engineers, Fort Monmouth, New Jersey, August 30, 2000.
- “The Discounted Cash Flow Method and Other Valuation Concepts,” two hour presentation to IRS Kansas and Missouri District Estate & Gift Tax attorneys and managers, Kansas City, Kansas, October 4, 1999.
- “The Discounted Cash Flow Method and Other Valuation Concepts,” presentation to IRS New York District Estate & Gift Tax attorneys and managers, New York, NY, August 16, 1999.
- “Business Valuation,” national closed circuit televised broadcast for Internal Revenue Service Estate Tax Agents, September 23, 1997 (with J. Murphy).
- “Valuation and Finance Principles Applied to Transfer Pricing,” a presentation to IRS and Treasury Department economists, Washington, DC, September 11, 1997 (with T. Reichert).
- “The Peculiar Market for Commercial Property: An Economically Irrational Situation,” Southwestern Economics Association Annual Meeting, Houston, Texas, March 23, 1996.
- “The Robin Hood Bias: A Study of Biased Damage Awards,” Southwestern Economics Association Annual Meeting, Houston, Texas, March 22, 1996.
- “Quantifying Comparability for Applications in International Trade and Intercompany Transfer Pricing: The Weighted Distance Method of Analyzing Comparability,” Southwestern Economics Association Annual Meeting, Houston, Texas, March 21, 1996.
- “Some Economic Issues in Transfer Pricing,” World Trade Institute: Tax Aspects of Intercompany Transfer Pricing, New York, NY, November 9-10, 1995.

MEDIA AND POPULAR PRESS

- Bloomberg Television Interview, New York Stock Exchange Trading Specialists, October 8, 2003.



PRECISION ECONOMICS, LLC
1901 PENNSYLVANIA AVE NW, SUITE 200
WASHINGTON, DC 20006
TEL. (202) 530-1113
FAX. (202) 530-1144
brian@precisionecon.com

BRIAN C. BECKER, Ph.D.

“Valuation Evaluation: How to Determine the Size of Interest in an LLC,” CFO.com, [Ask the Experts](#), August 31, 2001.

CONSULTING EXPERIENCE

CRITERION FINANCE, L.L.C., Washington, DC, 2001 - 2001

Partner and Senior Vice President

- Authored expert reports and articles on various transfer pricing topics, including cost sharing buy-ins.
- Wrote an expert report and provided deposition testimony estimating damages to a music database corporation from the anti-competitive acts of a competitor.

LECG, LLC, Washington, DC, 1999 - 2001

Senior Managing Economist

- Served as an economic expert in a pharmaceutical patent dispute regarding the relative values of early and late stage compounds.
- Submitted expert report on the process used to determine financial viability for state certified transportation services.

ECONOMIC CONSULTING SERVICES INC., Washington, DC, 1995 - 1999

Senior Economist (promoted from Economist)

- Analyzed transfer prices for corporations in a number of industries, including oil products, pharmaceuticals, consumer products, and software.
- Testified as an economic expert in international trade matters before the Canadian International Trade Tribunal and the U.S. International Trade Commission.

ARTHUR ANDERSEN, L.L.P., Washington, DC, 1994 - 1995

Manager, Economics Group

- Directed more than 20 transfer pricing studies.
- Submitted an expert witness report on executive compensation in Tax Court.

DELOITTE & TOUCHE NATIONAL TAX OFFICE, Washington, DC, 1992 - 1994

Senior Consultant, Economics Group

- Performed numerous tax economic analyses, primarily transfer pricing.
- Participated in seminars regarding transfer pricing and international taxation.



PRECISION ECONOMICS, LLC
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TEL. (202) 530-1113
FAX. (202) 530-1144
brian@precisionecon.com

BRIAN C. BECKER, Ph.D.

PROFESSORIAL EXPERIENCE

THE JOHNS HOPKINS UNIVERSITY, Washington, DC, 1997 - 2002
Visiting Professor of Finance

- MBA level Corporate Finance and Derivative Security courses.

MARYMOUNT UNIVERSITY, School of Business, Arlington, VA, 1993 - 1995
Visiting Professor of Statistics

- MBA and undergraduate level Statistics courses.

THE GEORGE WASHINGTON UNIVERSITY, School of Business and Policy Management,
Washington, DC, 1992-1993
Visiting Professor of Management Science

- MBA level Productions and Operations Management course.

UNIVERSITY OF PENNSYLVANIA, The Wharton School, Decision Sciences Department,
Philadelphia, PA, 1988 - 1990
Instructor

- Undergraduate level Computer Applications courses.

March 2009

Second Statement of Brian C. Becker

APPENDIX B

Second Statement of Brian C. Becker

Appendix B: List of Documents Relied Upon

1. Becker, Brian C. (2 March 2009). "Statement of Brian C. Becker,"
2. "December Monthly Report," Fax Transmission from Dennis Crowley to R. Pich. (11 January 2002).
3. Frost & Sullivan. (2007). "Strategic Analysis of Australian Water Treatment Chemicals Market."
4. Karoudjian, David. (22 July 2008). "Affidavit of David Karoudjian," Exhibit 1.
5. "May Monthly Report," Fax Transmission from Dennis Crowley to R. Pich. (5 June 2001).
6. "October Monthly Report," Fax Transmission from Dennis Crowley to R. Pich. (13 November 2001).
7. Pich, Rene. (22 July 2008). "Affidavit of Pich."
8. Schroeter, Russell H. (11 July 2008). "Affidavit of Russell Henry Schroeter."
9. Schroeter, Russell H. (14 August 2008). "Affidavit of Russell Henry Schroeter."

Second Statement of Brian C. Becker

APPENDIX C



Our ref. 08021392

10 March 2009

Dr Brian C. Becker
President
Precision Economics, LLC
1901 Pennsylvania Avenue NW, Suite 200
Washington, DC 20006

Australian Government Solicitor
Level 21, 200 Queen Street Melbourne VIC 3000
GPO Box 2853 Melbourne VIC 3001
T 03 9242 1222 F 03 9242 1333 DX 50 Melbourne
www.ags.gov.au

Canberra
Sydney
Melbourne
Brisbane
Perth
Adelaide
Hobart
Darwin

By courier

Dear Dr Becker

**SNF (Australia) Pty Limited v Commissioner of Taxation, Federal Court of
Australia proceeding No. VID 132 of 2008**

1. We refer to page 31 of your report dated 2 March 2009 at which you provide the following opinion:

Thus, the taxpayer has provided evidence that its proposed CUPs are at a different level of the market from the SNF AUSTRALIA purchases ...

2. We would be grateful if you could provide a supplementary report which explains this conclusion in more detail referring where necessary to the documents supplied to you. For that purpose, to the extent necessary, we would be grateful if you could again examine the copies of the invoices in your possession, and by reference to a reasonable sample, test the correctness of your conclusion that the proposed CUPs are at a different level of the market.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Evan Evagorou', written over a horizontal line.

Evan Evagorou
Senior Executive Lawyer
T +61 3 9242 1246 F +61 3 9242 1215
evan.evagorou@ags.gov.au