

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

August 28 20 24
Ravi Subramanian, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

NO. CR 24 - 145 JCC
INDICTMENT

v.

GEOFFREY K. AUYEUNG,
Defendant.

The Grand Jury charges that:

INTRODUCTION

1. Beginning no later than August 2022, and continuing until August 2024, the defendant, GEOFFREY K. AUYEUNG, and others known and unknown, individually, and by and through the use of companies they owned and controlled, laundered illicit proceeds obtained from a conspiracy and scheme to commit wire fraud.

2. In furtherance of the money-laundering activities described below, GEOFFREY K. AUYEUNG, and others known and unknown, formed numerous business entities (collectively, the "Subject Entities") including, but not limited to, the following:

a. Sea Forest International LLC;

- b. Apex Oil and Gas Trading LLC;
- c. Navigator Energy Logistics LLC;
- d. Terminal Energy International Escrow Service LLC;
- e. Energo Horizons Logistics (EA) LLC;
- f. Legacy Energy Logistics Transport Group LLC; and
- g. Green Tree Gateway LLC.

3. GEOFFREY K. AUYEUNG and the Subject Entities collectively opened and held at least 74 different accounts with at least 20 different financial institutions.

4. Perpetrators of the wire-fraud schemes induced victims to send money, ostensibly for the purpose of reserving oil tank storage in various locations, including in Rotterdam, Netherlands, and Houston, Texas, with the expectation that the victims would then rent the storage capacity to other individuals for profit.

5. The perpetrators instructed victims to send the payments via wire transfers to accounts controlled by GEOFFREY K. AUYEUNG and held at various financial institutions in the names of the Subject Entities, which were represented to victims as providing third-party escrow services.

6. In furtherance of those representations, GEOFFREY K. AUYEUNG and others entered, on behalf of the Subject Entities, into apparent escrow agreements with the victims of the wire-fraud scheme, in which the Subject Entities promised, among other acts and omissions, to hold all funds received from the victims in the course of alleged oil and gas investment agreements pending satisfaction of predetermined contractual obligations, and to refrain from combining personal accounts with escrow funds. GEOFFREY K. AUYEUNG further represented, on the Subject Entities' websites, that the Subject Entities were fully compliant with anti-money laundering laws and regulations.

1 location, source, ownership, and control of the proceeds of specified unlawful activity,
2 and that while conducting and attempting to conduct such financial transactions, knew
3 that the property involved in the financial transactions represented the proceeds of some
4 form of unlawful activity, all in violation of Title 18, United States Code, Section
5 1956(a)(1)(B)(i);

6 b. to knowingly engage and attempt to engage, in monetary
7 transactions by, through or to a financial institution, affecting interstate and foreign
8 commerce, in criminally derived property of a value greater than \$10,000, that is, United
9 States funds and cryptocurrencies, such property having been derived from a specified
10 unlawful activity, that is, wire fraud and conspiracy to commit wire fraud, in violation of
11 Title 18, United State Code, Sections 1343 and 1349, all in violation of Title 18, United
12 States Code, Section 1957.

13 **B. Manner and Means**

14 11. The manner and means used to accomplish the objectives of the conspiracy
15 included, among others, the following:

16 a. GEOFFREY K. AUYEUNG, and others known and unknown,
17 formed the Subject Entities, which they used and intended to use, at least in part, to
18 conceal and disguise the nature, location, source, ownership, and control of wire-fraud
19 proceeds, and to engage in monetary transactions in criminally derived property with a
20 value greater \$10,000.

21 b. GEOFFREY K. AUYEUNG, and others known and unknown,
22 opened numerous bank accounts at numerous financial institutions in the name of
23 GEOFFREY K. AUYEUNG and the Subject Entities, with the design of using the
24 accounts, at least in part, to conceal and disguise the nature, location, source, ownership,
25 and control of wire-fraud proceeds, and to engage in monetary transactions in criminally
26 derived property with a value greater \$10,000.

1 c. GEOFFREY K. AUYEUNG, and others known and unknown,
2 represented to others that the Subject Entities would act as escrow agents to facilitate
3 what victims were led to believe were investments in the oil and gas industry.

4 d. GEOFFREY K. AUYEUNG, and others known and unknown,
5 received deposits of United States funds, totaling millions of dollars, sent from victims of
6 wire fraud, in accounts held in the names of the Subject Entities.

7 e. GEOFFREY K. AUYEUNG, and others known and unknown,
8 ceased communications with the wire-fraud victims upon receiving deposits from the
9 victims.

10 f. GEOFFREY K. AUYEUNG, and others known and unknown,
11 rapidly dispersed wire-fraud proceeds deposited in accounts held in the names of the
12 Subject Entities by transferring those funds to other accounts held in the names of
13 GEOFFREY K. AUYEUNG and the Subject Entities, all with the design, at least in part,
14 to conceal and disguise the nature, location, source, ownership, and control of the wire-
15 fraud proceeds, and to engage in monetary transactions in criminally derived property
16 with a value greater \$10,000.

17 g. GEOFFREY K. AUYEUNG, and others known and unknown,
18 transferred funds traceable to wire-fraud proceeds in accounts held in the names of
19 GEOFFREY K. AUYEUNG and the Subject Entities to accounts at financial institutions
20 in foreign jurisdictions and to cryptocurrency exchanges including, without limitation,
21 Gemini Trust Company LLC, Coinbase, BitStamp, Circle Internet Financial LLC, all
22 with the design, at least in part, to conceal and disguise the nature, location, source,
23 ownership, and control of the wire-fraud proceeds, and to engage in monetary
24 transactions in criminally derived property with a value greater \$10,000.

25 h. GEOFFREY K. AUYEUNG, and others known and unknown,
26 concealed and disguised the nature of the foregoing transactions by providing financial
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1 institutions with fictitious descriptions of the transactions and by referencing fictitious
2 supporting documents, including loan agreements and invoices.

3 i. GEOFFREY K. AUYEUNG, and others known and unknown,
4 converted funds in accounts at cryptocurrency exchanges held in the names of
5 GEOFFREY K. AUYEUNG and the Subject Entities, which funds were traceable to
6 wire-fraud proceeds, to cryptocurrencies including, without limitation, Bitcoin (BTC),
7 Tether (USDT), USD Coin (USDC), and Ethereum (ETH), all with the design, at least in
8 part, to conceal and disguise the nature, location, source, ownership, and control of the
9 wire-fraud proceeds.

10 j. GEOFFREY K. AUYEUNG, and others known and unknown, sent
11 cryptocurrencies traceable to wire-fraud proceeds in accounts at cryptocurrency
12 exchanges held in the names of GEOFFREY K. AUYEUNG and the Subject Entities to
13 accounts held in the names of individuals known and unknown at other cryptocurrency
14 exchanges including, without limitation, Binance, all with the design, at least in part, to
15 conceal and disguise the nature, location, source, ownership, and control of the wire-
16 fraud proceeds.

17 k. GEOFFREY K. AUYEUNG, and others known and unknown,
18 transferred funds and cryptocurrencies totaling more than \$10,000.00 in wire-fraud
19 proceeds to other accounts controlled by GEOFFREY K. AUYEUNG and his co-
20 conspirators.

21 l. GEOFFREY K. AUYEUNG, and others known and unknown,
22 conducted, caused to be conducted, and aided and abetted the conducting of the following
23 financial and monetary transactions on or about the following dates, among others, which
24 are non-exhaustive examples of GEOFFREY K. AUYEUNG's and his co-conspirators'
25 money-laundering activities:
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	Date	Amount	Description of Transaction
1	09/02/2022	\$94,955.18	Check drawn on Banner Bank account -2608, held in
2			the name of Sea Forest International LLC, deposited in
3			Banner Bank account -6219, held in the name of
4			Geoffrey Auyeung
4	09/06/2022	\$62,800.00	International wire transfer from Key Bank
5			account -3099 to HSBC Bank account -1725 in
6			Malaysia
6	09/13/2022	\$108,000.00	International wire transfer from Key Bank account
7			-3099 to HSBC Bank account -1725 in Malaysia
7	01/09/2023	\$57,600.00	Online bank transfer of funds from Bank of America
8			account -1580, held in the name of Sea Forest
9			International LLC, to Bank of America account -2026,
10			held in the name of Apex Oil and Gas Trading LLC
10	01/10/2023	\$55,200.00	Wire transfer of funds from Bank of America account
11			-2026, held in the name of Apex Oil and Gas Trading
12			LLC, to JPMorgan Chase Bank account -2852 held in
12			the name of Gemini Trust Company LLC
12	05/01/2023	\$209,530.00	Transfer of funds from GBC International Bank
13			account -8368, held in the name of Navigator Energy
14			Logistics LLC, to GBC International Bank
15			account -5588, held in the name of Apex Oil and Gas
15			Trading LLC
15	05/01/2023	\$233,185.00	Wire transfer of funds from GBC International Bank
16			account -5588, held in the name of Apex Oil and Gas
17			Trading LLC, to JPMorgan Chase Bank account -2852
17			held in the name Gemini Trust Company LLC
18	05/30/2023	\$60,000.00	Online bank transfer of funds from East West Bank
19			account -8991, held in the name of Navigator Energy
20			Logistics LLC, to East West Bank account -8926, held
20			in the name of Apex Oil and Gas Trading LLC
20	05/31/2023	\$187,625.00	Online bank transfer of funds from East West Bank
21			account -8991, held in the name of Navigator Energy
22			Logistics LLC, to East West Bank account -8926, held
22			in the name of Apex Oil and Gas Trading LLC
23	05/31/2023	\$226,191.00	Wire transfer of funds East West Bank account -8926,
24			held in the name of Apex Oil and Gas Trading LLC, to
24			JPMorgan Chase Bank account -2852 held in the name
25			Gemini Trust Company LLC
25	05/31/2023	\$226,191.00	Credit of funds in Gemini account -7255, held in the
26			name of Apex Oil and Gas Trading LLC

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	Date	Amount	Description of Transaction
1	05/31/2023	194,588.451711	Purchase of tether with funds from Gemini
2		USDT	account -7255, held in the name of Apex Oil and Gas
3			Trading LLC
4	05/31/2023	194,582.455818	Transfer of tether from Gemini account -7255, held in
5		USDT	the name of Apex Oil and Gas Trading LLC, to address
6			0x0bb16193d319b5e585eabc08003b863f36d3c48b
7	06/01/2023	\$102,194.00	Online bank transfer of funds from First Citizens Bank
8			account -1524, held in the name of Navigator Energy
9			Logistics LLC, to First Citizens Bank account -1268,
10			held in the name of Apex Oil and Gas Trading LLC
11	06/01/2023	\$129,527.00	Wire transfer of funds from First Citizens Bank
12			account -1268, held in the name of Apex Oil and Gas
13			Trading LLC, to JPMorgan Chase Bank account -2852
14			held in the name Gemini Trust Company LLC
15	06/01/2023	\$129,527.00	Credit of funds in Gemini account -7255, held in the
16			name of Apex Oil and Gas Trading LLC
17	06/01/2023	0.97666796	Purchase of bitcoin with funds from Gemini account
18		BTC	-7255, held in the name of Apex Oil and Gas Trading
19			LLC
20	06/01/2023	0.97666796	Transfer of bitcoin from Gemini account -7255, held in
21		BTC	the name of Apex Oil and Gas Trading LLC, to address
22			1AcAfoTb6pkTYCRJucoalAPcfEeXTyBkma
23	08/07/2023	\$499,985.00	Online bank transfer of funds from Umpqua Bank
24			account -2637, held in the name of Apex Oil and Gas
25			Trading LLC, to Umpqua Bank account -5404, held in
26			the name of Navigator Energy Logistics LLC
27	08/07/2023	\$500,000.00	Wire transfer of funds from Umpqua Bank
			account -5404, held in the name of Navigator Energy
			Logistics LLC, to Circle Internet Financial LLC
	08/09/2023	\$500,000.00	Online bank transfer of funds from Umpqua Bank
			account -2637, held in the name of Apex Oil and Gas
			Trading LLC, to Umpqua Bank account -5404, held in
			the name of Navigator Energy Logistics LLC
	08/10/2023	\$645,000.00	Wire transfer of funds from Umpqua Bank account
			-5404, held in the name of Navigator Energy Logistics
			LLC, to Circle Internet Financial LLC
	11/07/2023	\$110,000.00	Online bank transfer of funds from Umpqua Bank
			account -7019, held in the name of Terminal Energy
			International Escrow Service LLC, to Umpqua Bank
			account -5404, held in the name of Navigator Energy
			Logistics LLC

Date	Amount	Description of Transaction
11/07/2023	\$110,000.00	Wire transfer of funds from Umpqua Bank account -5404, held in the name of Navigator Energy Logistics LLC, to Circle Internet Financial LLC
12/21/2023	\$235,000.00	Online bank transfer of funds from Umpqua Bank account -7019, held in the name of Terminal Energy International Escrow Service LLC, to Umpqua Bank account -2637, held in the name of Apex Oil and Gas Trading LLC
12/22/2023	\$550,000.00	Wire transfer of funds from Umpqua Bank account -2637, held in the name of Apex Oil and Gas Trading LLC, to Customers Bank account -9031, held in the name of Bitstamp USA Inc.
01/05/2024	\$605,000.00	Online bank transfer of funds from First Citizens Bank account -1831, held in the name of Energo Horizons Logistics (EA) LLC, to First Citizens Bank account -1268, held in the name of Apex Oil and Gas Trading LLC
01/05/2024	\$600,000.00	Wire transfer of funds from First Citizens Bank account -1268, held in the name of Apex Oil and Gas Trading LLC, to Customers Bank account -9031, held in the name of BitStamp USA Inc.
01/05/2024	\$600,000.00	Credit of funds in BitStamp USA Inc. account -8090, held in the name of Apex Oil and Gas Trading LLC
01/05/2024	521,113.2244 USDT	Purchase of tether with funds from BitStamp USA Inc. account -8090, held in the name of Apex Oil and Gas Trading LLC
01/05/2024	521,097.45759 USDT	Transfer of tether from BitStamp USA Inc. account -8090, held in the name of Apex Oil and Gas Trading LLC, to address 0xf9176477525816cf41c51fb d70051ceb8bda9854
01/19/2024	\$100,000.00	Wire transfer of funds from Umpqua Bank account -7019, held in the name of Terminal Logistics International Escrow Service LLC, to Boeing Employee Credit Union account -7917, held in the name of Geoffrey K. Auyeung

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS 2-7**(Money Laundering – Concealment)**

12. On or about the following dates, in King County, in the Western District of Washington, and elsewhere, GEOFFREY K. AUYEUNG, and others known and unknown, did knowingly conduct and attempt to conduct the following financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, wire fraud and conspiracy to commit wire fraud, in violation of Title 18, United States Code, Sections 1343 and 1349, knowing that the transactions were designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

Count	Date	Amount	Description of Transaction
2	05/31/2023	\$187,625.00	Online bank transfer of funds from East West Bank account -8991, held in the name of Navigator Energy Logistics LLC, to East West Bank account -8926, held in the name of Apex Oil and Gas Trading LLC
3	05/31/2023	\$226,191.00	Wire transfer of funds East West Bank account -8926, held in the name of Apex Oil and Gas Trading LLC, to JPMorgan Chase Bank account -2852 held in the name Gemini Trust Company LLC
4	05/31/2023	194,582.455818 USDT	Transfer of tether from Gemini account -7255, held in the name of Apex Oil and Gas Trading LLC, to address 0x0bb16193d319b5e585eabc08003b863f36d3c48b

Count	Date	Amount	Description of Transaction
5	01/05/2024	\$605,000.00	Online bank transfer of funds from First Citizens Bank account -1831, held in the name of Energo Horizons Logistics (EA) LLC, to First Citizens Bank account -1268, held in the name of Apex Oil and Gas Trading LLC
6	01/05/2024	\$600,000.00	Wire transfer of funds from First Citizens Bank account -1268, held in the name of Apex Oil and Gas Trading LLC, to Customers Bank account -9031, held in the name of BitStamp USA Inc.
7	01/05/2024	521,097.45759	Transfer of tether from BitStamp USA USDT Inc. account -8090, held in the name of Apex Oil and Gas Trading LLC, to address 0xf9176477525816cf41c51fbd70051ceb8bda9854

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS 8–10

(Money Laundering – Spending)

13. On or about the following dates, in King County, in the Western District of Washington, and elsewhere, GEOFFREY K. AUYEUNG, and others known and unknown, did knowingly engage and attempt to engage in the following monetary transactions, by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, wire fraud and conspiracy to commit wire fraud, in violation of Title 18, United State Code, Sections 1343 and 1349:

Count	Date	Amount	Description of Transactions
8	08/07/2023	\$499,985.00	Online bank transfer of funds from Umpqua Bank account -2637, held in the name of Apex Oil and Gas Trading LLC, to Umpqua Bank account -5404, held in the name of Navigator Energy Logistics LLC

Count	Date	Amount	Description of Transactions
9	08/09/2023	\$500,000.00	Online bank transfer of funds from Umpqua Bank account -2637, held in the name of Apex Oil and Gas Trading LLC, to Umpqua Bank account -5404, held in the name of Navigator Energy Logistics LLC
10	01/19/2024	\$100,000.00	Wire transfer of funds from Umpqua Bank account -7019, held in the name of Terminal Logistics International Escrow Service LLC, to Boeing Employee Credit Union account -7917, held in the name of Geoffrey K. Auyeung

All in violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE ALLEGATION

14. The allegations contained in Counts 1–10 above are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of any of the offenses alleged in Counts 1–10, GEOFFREY K. AUYEUNG shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property. All such property is forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), and includes, but is not limited to:

a. a sum of money, also known as a forfeiture money judgment, reflecting the property involved in the offense;

b. \$616,113.45 in United States funds seized from Bank of America account -1204, held in the name of Legacy Energy Logistics Transport Group LLC;

c. \$575,951.72 in United States funds seized from Bank of America account -9305, held in the name of Energo Horizons Logistics (EA) LLC;

d. \$350,401.95 in United States funds seized from Bank of America account -1655, held in the name of Geoffrey K. Auyeung;

e. \$309,130.43 in United States funds seized from Bank of America account -0062, held in the name of Green Tree Gateway LLC;

1 f. \$207,860.32 in United States funds seized from Boeing Employee
2 Credit Union account -7917, held in the name of Geoffrey K. Auyeung;

3 g. \$86,282.60 in United States funds seized from Bank of America
4 account -2026, held in the name of Apex Oil and Gas Trading LLC;

5 h. \$84,201.84 in United States funds seized from Bank of America
6 account -3847, held in the name of Navigator Energy Logistics LLC;

7 i. \$50,493.21 in United States funds seized from Bank of America
8 account -1580, held in the name of Sea Forest International LLC;

9 j. \$2,713 in United States funds seized from Boeing Employee Credit
10 Union account -5228, held in the name of Maria Auyeung;

11 k. \$17,309.11 in United States currency seized from the residence of
12 GEOFFREY K. AUYEUNG;

13 l. All funds—including cyptocurrencies—stored in or accessible via
14 the BitStamp USA, Inc. account ending -8090, registered to Apex Oil and Gas Trading
15 LLC; and

16 m. one 2024 Audi SQ8, VIN WA1CWBF16RD008854.

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1 15. **Substitute Assets.** If any of the above-described forfeitable property, as a
2 result of any act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;
- 4 b. has been transferred or sold to, or deposited with, a third party;
- 5 c. has been placed beyond the jurisdiction of the Court;
- 6 d. has been substantially diminished in value; or,
- 7 e. has been commingled with other property which cannot be divided
8 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).

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13 A TRUE BILL: *Yes*

14 DATED: *8/28/2024*

15
16 *Signature of Foreperson redacted pursuant
17 to the policy of the Judicial Conference of
the United States.*

18 _____
FOREPERSON

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20 _____
YESSA M. GORMAN
United States Attorney

21 
22 _____
SETH WILKINSON
Assistant United States Attorney

23 
24 _____
YUNAH CHUNG
25 JEHIEL I. BAER
26 Assistant United States Attorneys
27