

04 - 20072 CR - GOLD

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No. \_\_\_\_\_

MAGISTRATE JUDGE  
SIMONTON

33 U.S.C. § 1908(a)  
18 U.S.C. § 2  
18 U.S.C. § 371  
18 U.S.C. § 1025

UNITED STATES OF AMERICA

v.

RICK DEAN STICKLE,  
MICHAEL D. REEVE,  
JOHN KARAYANNIDES,  
MICHAEL M. KRIDER,  
GEORGE K. MCKAY, and  
PHILIP J. HITCHENS,

Defendants. /

FILED BY  
FEB 04 3 09 PM '04  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

**INDICTMENT**

The Grand Jury charges that:

**COUNT I**  
(Conspiracy)

**INTRODUCTION**

At all times relevant to this Indictment:

1. Sabine Transportation Company (Sabine), was an Iowa corporation headquartered in Cedar Rapids, Iowa, and was in the business of managing and operating United States flagged oceangoing vessels engaged in the transportation of various dry and liquid commercial cargoes. Sabine was one of a number of affiliated, closely held companies known collectively as the Stickle Group. Sabine time chartered vessels to another Stickle Group company, August Trading, Inc., that served as the broker for the charter party agreements with commercial freight customers.

2. A company affiliated with the Stickle Group purchased the *S.S. Juneau*, a United

States registered single-hull tank vessel, 853 ft. in length, 57,691 gross tons, in September 1998. In October 1998, the United States Coast Guard issued an amended Certificate of Inspection, reclassifying the vessel as a freighter and authorizing the vessel to transport a shipment of grain from the United States to Bangladesh. At all times relevant hereto, Sabine operated the *S.S. Juneau*.

3. Defendant RICK DEAN STICKLE was the majority stockholder of Sabine and the other companies within the Stickle Group. Defendant STICKLE was the Chairman of the Board of Sabine and of a number of the other companies within the Stickle Group. Defendant STICKLE oversaw the business activities of all of the companies within the Stickle Group and was involved in the day-to-day management of those companies, including the vessel operations of Sabine.

4. Defendant MICHAEL D. REEVE was the President of Sabine, August Trading, Inc., and of a number of the other companies within the Stickle Group. Defendant REEVE was responsible for managing all aspects of Sabine's business activities and for supervising the heads of the several departments within the company, including the Operations Department.

5. Defendant JOHN KARAYANNIDES was the Vice President of Operations for Sabine. Defendant KARAYANNIDES was responsible for the direct supervision of the personnel within the Operations Department of Sabine.

6. Defendant MICHAEL M. KRIDER was a Port Engineer for Sabine and served as Marine Superintendent for the *Juneau* during a dry dock inspection in Singapore.

7. Defendant GEORGE K. MCKAY was the Master aboard the *Juneau* from January 30, 1998, through at least March 5, 1999. Defendant MCKAY was responsible for supervising the activities of all departments aboard the vessel.

8. Defendant PHILIP J. HITCHENS was the Chief Officer aboard the *Juneau* from early January 1999, through at least March 5, 1999. Defendant HITCHENS was responsible for

supervising the activities of the Deck Department aboard the vessel.

9. The MARPOL Protocol (MARPOL) is an international treaty implemented in the United States by the Act to Prevent Pollution from Ships (APPS), 33 U.S.C. §§ 1901 *et seq.* APPS makes it a crime for any person to knowingly violate MARPOL, APPS, or the federal regulations promulgated under APPS. 33 U.S.C. § 1908(a). These regulations apply to vessels operated under the authority of the United States and engaged in international voyages or certificated for ocean service. 33 C.F.R. § 151.09.

10. MARPOL sets forth the international standards for the maximum amount of oil and oily mixtures permitted to be discharged overboard from vessels. This standard is 15 parts per million (ppm) when the vessel is within 12 nautical miles of land, and 100 ppm of oil when more than 12 nautical miles from land. MARPOL Annex I, Reg.9. MARPOL also requires vessels to have and maintain an oil discharge monitoring and control system, such as that found in oil discharge monitoring equipment (ODME), used to prevent the discharge of a mixture containing more than the legally permitted concentration of oil from the cargo tanks aboard such vessels. MARPOL Annex I, Reg. 16. Typically, when such a sensor detects more than the allowable parts per million of oil, it sounds an alarm and shuts down the discharge operation.

11. The United States Coast Guard is charged with enforcing the laws of the United States and is empowered under 14 U.S.C. § 89(a) to board vessels and conduct inspections and investigations of potential violations. The Coast Guard is authorized to examine a vessel's records to determine, among other things, whether the vessel has operable pollution prevention equipment and appropriate procedures, and whether the vessel has discharged any oil or oily mixtures in violation of MARPOL, APPS, or any other applicable federal regulation. 33 C.F.R. §§ 151.23(a)(3), 151.23(c).

12. The Coast Guard also has the authority to issue subpoenas to require the attendance of witnesses or the production of documents or other evidence to determine whether a vessel is in violation of MARPOL or APPS. 33 C.F.R. §151.07(d). If the Coast Guard finds evidence that a vessel is not in substantial compliance with MARPOL or APPS, the Coast Guard is empowered to deny a vessel's entry to a United States Port or detain a vessel in port until it determines that the vessel does not present an unreasonable threat to the marine environment. 33 C.F.R. §§ 151.07(b). Coast Guard inspectors have additional enforcement tools at their disposal against vessels and persons found to be in violation of applicable laws, including civil-administrative penalty adjudications, and revocation of customs clearance. 46 U.S.C. § 91; 33 C.F.R. § 1.07. Among other duties, the Office of Compliance within the Marine Safety, Security and Environmental Protection Office at Coast Guard Headquarters in Washington, D.C., works to ensure United States flag vessel compliance with domestic marine safety and environmental regulations as well as international standards for safety and environmental protection. 46 C.F.R. § 1.01-10(b)(1)(ii)(A).

13. The Coast Guard maintains Marine Safety offices for the purpose of conducting necessary inspections of merchant vessels to insure compliance with MARPOL, other applicable international treaties, and domestic laws. The Marine Safety offices report to various District Offices. The Marine Safety office in Portland, Oregon reports to the Commander, Thirteenth Coast Guard District in Seattle, Washington. The Commander of the Thirteenth District has the authority to detain a substantially non-compliant vessel in port, or to take other lawful action against it. The Marine Inspection Detachment in Singapore reports to Marine Inspection, Asia, which reports to the Commander of the Fourteenth Coast Guard District in Honolulu, Hawaii. The Office of Compliance is a component of the Marine Safety, Security and Environmental Protection Office within Coast Guard Headquarters in Washington, D.C. The Office of Compliance oversees the operation of a

Traveling Inspection Team to ensure United States flag vessel compliance with safety and environmental regulations.

14. The Commodity Credit Corporation (CCC) is a government corporation chartered by statute, 15 U.S.C. § 714 *et seq.*, within the Department of Agriculture. The CCC donates commodities, such as wheat, to voluntary relief agencies, such as the Cooperative for American Relief Everywhere (CARE), pursuant to the Agricultural Trade and Development Assistance Act, 7 U.S.C. § 1721 *et seq.*, and surveys of the count and condition of such cargoes are required to be performed at the time of discharge. 22 C.F.R. § 211.9(c)(1)(i). Funds collected on claims arising from the loss or damage to such cargoes are to be remitted to the CCC and uncollected claims for such losses or damages are assigned to the CCC for collection. 22 C.F.R. § 211.9(c)(2)(ii)(F).

15. Voluntary relief agencies, such as CARE, typically use private corporations to act as agents on their behalf for the purpose of monitoring the carriage and delivery of commodity cargoes.

### **BACKGROUND**

16. Beginning on or about December 22, 1998, and continuing through on or about May 27, 1999, within the Southern District of Florida and elsewhere, the defendants,

**RICK DEAN STICKLE,  
MICHAEL D. REEVE, and  
JOHN KARAYANNIDES,**

and other persons known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree to violate the laws of the United States as set forth below:

**A. Discharge of Oil and Oily Mixture:** To knowingly discharge and cause to be discharged from a ship of more than 400 gross tons oil and an oily mixture, to wit, approximately 442 metric tons of diesel-contaminated wheat and diesel fuel, into the sea without the use of an oil discharge

monitoring and control system in violation of Title 33, United States Code, Section 1908(a).

**B. Obstruction of an Agency Proceeding:** To corruptly endeavor to influence, obstruct, and impede the due and proper administration of the law under a pending proceeding by the United States Department of Transportation and United States Coast Guard, by presenting the United States Coast Guard with false and misleading statements and records, knowing that the statements and records were false and misleading and that the Coast Guard was conducting a proceeding to determine whether the vessel had operated and was operating in compliance with the law, in violation of Title 18, United States Code, Section 1505.

**C. Defraud the United States:** To defraud the United States, that is to hamper, hinder, impede, impair and obstruct by craft, trickery, deceit, and dishonest means, the lawful and legitimate functions of the United States Coast Guard in enforcing the federal environmental laws and regulations, and the Department of Agriculture and its agency, CCC, in enforcing the laws and regulations governing the carriage and delivery of donated agricultural commodities.

#### **Manner and Means**

Among the manner and means used by the defendants and their co-conspirators, both known and unknown to the Grand Jury, to effectuate this conspiracy and to further its objectives were the following:

17. It was part of the conspiracy that the defendants made and caused the making of detailed arrangements to accomplish the unlawful dumping of the diesel-contaminated wheat into the sea from the *Juneau* without use of an oil discharge monitoring and control system, while preventing government officials of several countries, including the United States, from learning of their plans to dump the contaminated wheat unlawfully.

18. It was further part of the conspiracy that defendants created and caused the creation of false documents, made and caused the making of false statements, procured documents from the United States Coast Guard by false pretenses for the purpose of deceiving the Department of Agriculture and avoided providing truthful information to port officials in Bangladesh and Singapore, to agents for CARE, and to the United States Coast Guard regarding the disposal of the diesel-contaminated wheat.

19. It was further part of the conspiracy that defendants engaged in a pattern of conduct designed to obstruct and impede a proceeding initiated by United States Coast Guard regarding safety and environmental compliance vessels owned and operated by Sabine, including the unlawful dumping of the diesel-contaminated wheat from the *Juneau*.

20. It was further part of the conspiracy that defendants sought to avoid expenses and the commitment of other resources necessary to comply with United States and international environmental laws and treaties.

#### **Overt Acts**

21. In furtherance of the conspiracy and to effect the objects thereof, there was committed and caused to be committed by at least one of the co-conspirators herein, within the Southern District of Florida and elsewhere, at least one of the following overt acts, among others:

Overt Act 1: On or about December 22, 1998, defendants STICKLE and KARAYANNIDES directed and caused the *Juneau* to sail from Bangladesh with approximately 442 metric tons of diesel-contaminated wheat remaining on board the ship in cargo tank 4C.

Overt Act 2: On or about December 24, 1998, defendant KARAYANNIDES and a co-conspirator known to the Grand Jury, then working in the Operations Department of Sabine,

instructed the then-Master of the *Juneau* to enter the Port of Singapore and to withhold information from shipyard personnel and port authorities concerning the diesel-contaminated wheat remaining on board the vessel.

Overt Act 3: During late December 1998, defendant STICKLE instructed another co-conspirator known to the Grand Jury, then serving as the Marine Superintendent for the *Juneau* in Singapore, to reject a bid for the on-shore disposal of the diesel-contaminated wheat in Singapore and advised the identified co-conspirator that Sabine would make arrangements to dump the diesel-contaminated wheat during the return voyage to the United States.

Overt Act 4: In early January 1999, defendant REEVE instructed Sabine's representatives in Chittagong, Bangladesh to tell the agents for CARE and the representatives of the United States Department of Agriculture that Sabine would make arrangements for the on-shore destruction of the diesel-contaminated wheat and obtain a Certificate of Destruction in Singapore.

Overt Act 5: In early January 1999, defendant STICKLE instructed a co-conspirator known to the Grand Jury, then serving as the Marine Superintendent for the *Juneau* in Singapore, to reject a second bid for the on-shore disposal of the diesel-contaminated wheat.

Overt Act 6: On January 11, 1999, defendant KARAYANNIDES solicited a bid from a maritime services company in Bangladesh to supply a crew of 15 laborers to travel to Singapore, sail aboard the *Juneau* during the return voyage to Portland, Oregon, and dump the diesel-contaminated wheat into the sea.

Overt Act 7: On January 14, 1999, defendant KARAYANNIDES informed a co-conspirator, then serving as the Marine Superintendent for the *Juneau* in Singapore, that defendant KARAYANNIDES was in discussions with a Bengali manning agency to supply a crew of tank cleaners to sail with the *Juneau* during the return voyage to Portland, Oregon.



Overt Act 8: In late January 1999, defendant STICKLE instructed a co-conspirator known to the Grand Jury, then serving as the Marine Superintendent of the *Juneau* in Singapore, to reject a third bid for on-shore disposal of the diesel contaminated wheat in Singapore and advised the identified co-conspirator that Sabine would hire a crew of Bulgarian laborers to travel to Singapore, sail aboard the *Juneau* during the return voyage to Portland, Oregon, and dump the diesel-contaminated wheat into the sea.

Overt Act 9: On January 25, 1999, defendant KARAYANNIDES spoke by telephone with an officer at the United States Coast Guard Marine Safety Office in Portland, Oregon and inquired how an "oily water" could lawfully be discharged from the *Juneau* at sea. Defendant KARAYANNIDES misrepresented to the Coast Guard officer that the contaminated wheat that had been in the tank had already been removed and he assured her that the discharge of the "oily water" would be run through an oil water content monitor and appropriate records would be maintained. On the same date, defendant KARAYANNIDES sent a misleading letter to the Coast Guard officer in an effort to memorialize the Coast Guard's supposed approval of the discharge.

Overt Act 10: On January 26, 1999, defendant KARAYANNIDES concluded a Seaman's Employment Agreement with 15 Bulgarian laborers to travel to Singapore, sail aboard the *Juneau* during its return voyage to Portland, Oregon, and dump the diesel-contaminated wheat into the sea.

Overt Act 11: On or about January 27, 1999, a co-conspirator known to the Grand Jury, then serving as the Marine Superintendent for the *Juneau* in Singapore, and acting on instructions from defendant KARAYANNIDES, misled a United States Coast Guard officer at the Marine Inspection Detachment in Singapore as to the contamination aboard the *Juneau* for the purpose of obtaining a document from the Coast Guard officer.

Overt Act 12: On or about January 27, 1999, defendant KARAYANNIDES instructed a co-conspirator known to the Grand Jury, then serving as the Marine Superintendent for the *Juneau* in Singapore, to transmit by facsimile to Sabine headquarters in Cedar Rapids, Iowa, the document described in Overt Act 11 that the identified co-conspirator obtained from the Coast Guard official in Singapore.

Overt Act 13: On or about January 28, 1999, co-conspirators known and unknown to the Grand Jury arranged to have the 15 Bulgarian laborers referenced in Overt Act 10 flown to Singapore and transported to the *Juneau*.

Overt Act 14: In late January 1999, co-conspirators known and unknown to the Grand Jury arranged to have 2 evacuator technicians flown to Singapore and transported to the *Juneau*.

Overt Act 15: On January 31, 1999, a co-conspirator known to the Grand Jury, then serving as the Master of the *Juneau*, caused the ship to sail from Singapore with approximately 442 metric tons of diesel-contaminated wheat remaining on board in cargo tank 4C of the ship.

Overt Act 16: During the period on or about February 1, 1999, and continuing to on or about February 7, 1999, defendants STICKLE, REEVE, KARAYANNIDES, and co-conspirators known to the Grand Jury, then serving as the Master and the Chief Officer of the *Juneau*, discharged and caused the discharge of approximately 442 metric tons of diesel-contaminated wheat and diesel fuel into the sea from the *Juneau* while the ship was on the high seas without the use of an oil discharge monitoring and control system.

Overt Act 17: On or about February 4, 1999, a co-conspirator known to the Grand Jury, then working in the Operations Department of Sabine, sent a letter by facsimile to the agent for CARE implying that the United States Coast Guard had approved the discharge of the diesel-

contaminated wheat at sea, falsely stating that the diesel-contaminated wheat aboard the *Juneau* would be properly discharged at sea in compliance with applicable MARPOL regulations, and attaching a copy of the document described in Overt Act 11 that had been obtained by false pretenses from a United States Coast Guard officer in Singapore.

Overt Act 18: On March 24, 1999, defendant KARAYANNIDES was interviewed aboard the *Juneau* in the port of Portland, Oregon, by a Special Agent of the Federal Bureau of Investigation and defendant KARAYANNIDES made false and misleading statements concerning the nature of the contamination of the wheat aboard the *Juneau* and failed to provide relevant information concerning the dumping of the diesel-contaminated wheat into the sea.

Overt Act 19: On March 30, 1999, a co-conspirator known to the Grand Jury, previously the Master aboard the *Juneau* during the voyage from Singapore to Portland, Oregon, was interviewed in Galveston, Texas, by Special Agents of the United States Coast Guard Investigative Service and he made misleading statements regarding the quantity of the diesel-contaminated wheat that had been aboard the *Juneau* and the extent of the diesel contamination of the wheat.

Overt Act 20: On April 6, 1999, a co-conspirator known to the Grand Jury, previously the Chief Officer aboard the *Juneau* during the voyage from Singapore to Portland, Oregon, was interviewed by Special Agents of the Federal Bureau of Investigation in West Palm Beach, Florida and he falsely stated that there was only a trace amount of diesel fuel in the contaminated wheat that was on board the *Juneau* in an effort to convince the investigators that the contaminated wheat had been discharged lawfully.

Overt Act 21: On May 27, 1999, defendant REEVE, in response to a communication from a United States Coast Guard official requiring Sabine to investigate and analyze a series of incidents and casualties involving Sabine vessels, including the report that a cargo of grain

contaminated with diesel had been dumped from the *Juneau* in February 1999, falsely stated that, “[i]f environmental statutes were in fact violated the violation occurred without the knowledge, authorization or consent of the shore based management of the company.”

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

**COUNT 2**  
(Discharge of Oil and Oily Mixture)

During the period on or about February 1, 1999 through on or about February 7, 1999, while on the high seas, the defendants,

**RICK DEAN STICKLE,  
MICHAEL D. REEVE,  
JOHN KARAYANNIDES,  
GEORGE K. MCKAY,  
and  
PHILIP J. HITCHENS,**

defendant **HITCHENS** being a resident of the Southern District of Florida, did knowingly discharge and cause to be discharged from a ship of more than 400 gross tons oil and an oily mixture, to wit, approximately 442 metric tons of diesel-contaminated wheat and diesel fuel, into the sea without the use of an oil discharge monitoring and control system.

In violation of Title 33, United States Code, Section 1908(a); Title 33, Code of Federal Regulations, Section 151.10(a); MARPOL, Annex I, Regulation 9; and Title 18, United States Code, Section 2.

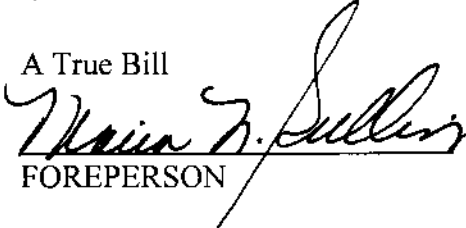
**COUNT 3**  
(False Pretenses)



On or about January 27, 1999, upon a vessel within the special maritime and territorial jurisdiction of the United States, the defendant,

**MICHAEL M. KRIDER,**


by false pretenses, procured the execution and delivery of an instrument of writing, the value of which did not exceed \$1,000.00.

In violation of Title 18, United State Code, Section 1025.

A True Bill  
  
FOREPERSON

  
for MARCOS DANIEL JIMENEZ  
UNITED STATES ATTORNEY  
  
THOMAS A. WATTS-FITZGERALD  
Assistant United States Attorney

THOMAS L. SANSONETTI  
ASSISTANT ATTORNEY GENERAL  
ENVIRONMENT & NATURAL  
RESOURCES DIVISION  
U.S. DEPARTMENT OF JUSTICE

  
GREGORY F. LINSIN  
Special Litigation Counsel  
Environmental Crimes Section

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. \_\_\_\_\_

vs.

CERTIFICATE OF TRIAL ATTORNEY\*

Rick Dean Stickle, et al,

\_\_\_\_\_ Defendants \_\_\_\_\_ /

Superseding Case Information:

Court Division: (Select One)

New Defendant(s) Yes \_\_\_\_\_ No \_\_\_\_\_  
Number of New Defendants \_\_\_\_\_  
Total number of counts \_\_\_\_\_

X Miami \_\_\_\_\_ Key West  
\_\_\_\_\_ FTL \_\_\_\_\_ WPB \_\_\_\_\_ FTP

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
- Interpreter: (Yes or No) \_\_\_\_\_ No  
List language and/or dialect \_\_\_\_\_
- This case will take 12 days for the parties to try.

5. Please check appropriate category and type of offense listed below:  
(Check only one) (Check only one)

- |     |                  |          |         |       |
|-----|------------------|----------|---------|-------|
| I   | 0 to 5 days      | _____    | Petty   | _____ |
| II  | 6 to 10 days     | _____    | Minor   | _____ |
| III | 11 to 20 days    | <u>X</u> | Misdem. | _____ |
| IV  | 21 to 60 days    | _____    | Felony  | _____ |
| V   | 61 days and over | _____    |         |       |

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CLERK OF DISTRICT COURT  
S.D. OF FLORIDA  
MIAMI

6. Has this case been previously filed in this District Court? (Yes or No) \_\_\_\_\_ No

If yes:  
Judge: \_\_\_\_\_ Case No. \_\_\_\_\_

(Attach copy of dispositive order)  
Has a complaint been filed in this matter? (Yes or No) No

If yes:  
Magistrate Case No. \_\_\_\_\_

Related Miscellaneous numbers: \_\_\_\_\_

Defendant(s) in federal custody as of \_\_\_\_\_

Defendant(s) in state custody as of \_\_\_\_\_

Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_

Is this a potential death penalty case? (Yes or No) \_\_\_\_\_ No

- Does this case originate from a matter pending in the U.S. Attorney's Office prior to April 1, 2003? \_\_\_ Yes X No
- Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? \_\_\_ Yes X No  
If yes, was it pending in the Central Region? \_\_\_ Yes \_\_\_ No
- Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? \_\_\_ Yes X No
- Does this case originate from a matter pending in the Narcotics Section (Miami) prior to May 18, 2003? \_\_\_ Yes X No

\_\_\_\_\_  
Thomas Watts-FitzGerald  
ASSISTANT UNITED STATES ATTORNEY  
Florida Bar No. 273538

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: RICK DEAN STICKLE

Case No: \_\_\_\_\_

Count #: 1 **04 - 20072** CR - GOLD MAGISTRATE JUDGE  
SIMONTON

Conspiracy

Title 18, United States Code, Section 371

**\* Max. Penalty: 5 years' imprisonment**

Count #: 2

Illegal Dumping of Oil

Title 33, United States Code, Section 1908(a)

**\*Max. Penalty: 5 years' imprisonment**

Count #:

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S.D. OF FLORIDA  
MIAMI

**\*Max. Penalty:**

Count #:

**\*Max. Penalty:**

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MICHAEL D. REEVE

Case No: 04-20072 CR - GOLD

MAGISTRATE JUDGE  
SIMONTON

Count #: 1

Conspiracy

Title 18, United States Code, Section 371

\* Max. Penalty: 5 years' imprisonment

Count #: 2

Illegal Dumping of Oil

Title 33, United States Code, Section 1908(a)

\*Max. Penalty: 5 years' imprisonment

Count #:

\*Max. Penalty:

Count #:

\*Max. Penalty:

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S.D. OF FLORIDA - MIAMI

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JOHN KARAYANNIDES

Case No: 04-20072 CR-GOLD MAGISTRATE JUDGE  
SIMONTON

Count #: 1

Conspiracy

Title 18, United States Code, Section 371

\* Max. Penalty: 5 years' imprisonment

Count #: 2

Illegal Dumping of Oil

Title 33, United States Code, Section 1908(a)

\*Max. Penalty: 5 years' imprisonment

Count #:

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COURT  
S.D. OF FLORIDA MIAMI

\*Max. Penalty:

Count #:

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JOHN KARAYANNIDES

Case No: 04-20072 CR - GOLD MAGISTRATE JUDGE  
SIMONTON

Count #: 1

Conspiracy

Title 18, United States Code, Section 371

**\* Max. Penalty: 5 years' imprisonment**

Count #: 2

Illegal Dumping of Oil

Title 33, United States Code, Section 1908(a)

**\*Max. Penalty: 1 year imprisonment**

Count #:

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CLERK OF COURT  
S.D. OF FLORIDA - MIAMI

**\*Max. Penalty:**

Count #:

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: GEORGE K. MCKAY

Case No: 04-20072 CR-GOLD MAGISTRATE JUDGE  
SIMONTON

Count #: 2

Illegal Discharge of Oil

Title 33, United States Code, Section 1908(a)

\* Max. Penalty: 5 years' imprisonment

Count #:

\*Max. Penalty:

Count #:

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COURT SOUTHERN DISTRICT  
OF FLORIDA - MIAMI

\*Max. Penalty:

Count #:

\*Max. Penalty:

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: PHILIP J. HITCHENS

MAGISTRATE JUDGE  
SIMONTON

**04-20072-CR-GOLD**

Case No: \_\_\_\_\_

Count #: 2

Illegal Discharge of Oil

Title 33, United States Code, Section 1908(a)

**\* Max. Penalty: 5 years' imprisonment**

Count #:

\_\_\_\_\_

**\*Max. Penalty:**

Count #:

\_\_\_\_\_

**\*Max. Penalty:**

Count #:

\_\_\_\_\_

**\*Max. Penalty:**

\_\_\_\_\_

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S.D. OF FLORIDA - MIAMI

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

No. 04-2002 CR-GOLD

UNITED STATES DISTRICT COURT  
MAGISTRATE JUDGE  
SIMONTON

SOUTHERN District of FLORIDA

CRIMINAL Division

THE UNITED STATES OF AMERICA

VS.

Rick Dean Strickle, Michael D. Reeve, John Karayannides,

Michael M. Krider, George K. McKay, and Philip J. Hitchens

INDICTMENT

IN VIOLATION OF: 33 USC § 1908(a)

- 18 USC § 2
- 18 USC § 371
- 18 USC § 1025

A true bill.

Grand Jury Indictment No. 03-01(MIA)

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 2004.

*Christina* 2/3/04

Clerk

Bail \$ \_\_\_\_\_

*William P. Sullivan*  
Foreman