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CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
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08-CR-05653-INFO

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.

STX PAN OCEAN CO., LTD.,  
EMILIO D. CANILLO, and  
BONG JUN GANG,  
Defendants.

NO. CR08-5653 BHS  
INFORMATION  
(Felony)

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

On or about August 3, 2008, in the Port of Longview, within the Western District of Washington, Defendant STX PAN OCEAN CO., LTD., through the actions of their employees, agents and servants, knowingly failed to maintain a required record in which all discharges of garbage from the marine motor vessel Pan Voyager had been accurately documented; notably, the Garbage Record Book presented or made available to United States Coast Guard inspectors omitted any reference to a July 24, 2008 incident during which a substantial quantity of oil contaminated garbage, including plastics, were dumped into the ocean.

All in violation of Title 33, United States Code, Sections 1907(d) and 1908(a).

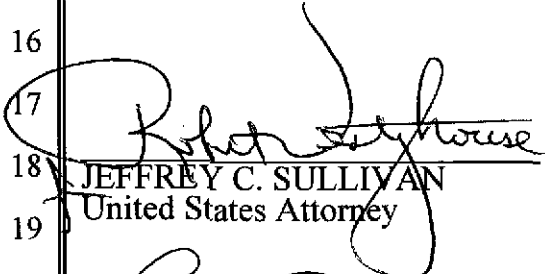
COUNT 2

(Misprision of Felony)

On or about August 3, 2008, in the Port of Longview, within the Western District of Washington, Defendants EMILIO D. CANILLO and BONG JUN GANG had knowledge of the actual commission of a felony but concealed the felony and did not make known their respective knowledge to United States authorities; notably, Defendants EMILIO D. CANILLO and BONG JUN GANG having full knowledge of a July 24, 2008 garbage dumping incident on board the marine motor vessel Pan Voyager and the fact that the Garbage Record Book, a record required by international and domestic laws to accurately document all discharges, omitted any reference to that dumping incident, and affirmatively concealed the omission by signing the Garbage Record Book and failing to notify United States Coast Guard inspectors and investigators of the false and fraudulent documentation.

All in violation of Title 18, United States Code, Section 4.

DATED this 17th day of September, 2008.

  
JEFFREY C. SULLIVAN  
United States Attorney

  
CARL BLACKSTONE  
Assistant United States Attorney

  
JAMES D. OESTERLE  
Assistant United States Attorney