

Exhibit 1 to Sixth Amended Complaint

RICO FRAUD CHART

Plaintiffs allege the following upon information and belief. Plaintiffs reserve the right to amend this pleading following discovery.

	Date	Mode of Communication and Locations	Participants	Details
F 1	Fall 2003	Electronic mail, telephone or fax (wires) between Mumbai, India, and Kerala, India	Sachin Dewan or representatives of Dewan Consultants to Representatives of the Malayala Manorama.	Transmission of advertisement to Malayala Manorama indicating offer of an opportunity for work-based permanent residence in the United States.
F 2	Fall 2003	Newspaper ad in <i>Malayala Manorama</i> , Alapi, Kerala, India	Sabulal Vijayan	Sabulal Vijayan first heard of the opportunity to go to the U.S. while he was on leave from his job in Dubai, UAE. His friend called him about the ad, indicated jobs the U.S. with permanent residency were available. The ad also stated that interested workers should attend an open meeting at a hotel in Kochi, Kerala, India.
F 3	In or around Late 2003 or early 2004	Mails, or telephone, fax, and/ or electronic mail (wires) between New Orleans, Louisiana; Mumbai,,India; and/or Dubai, UAE	Malvern C. Burnett, Law Offices of Malvern C. Burnett (“Burnett Law Offices”), Gulf Coast Immigration Law Center (“GCILC”), Kurella Rao, Indo-Amerisoft LLC, Sachin Dewan, and Dewan Consultants	Discussions and transmission of materials related to preparing for Dubai meeting and preparation of contracts and other paperwork to be signed by prospective workers. Specific information regarding these communications is largely in the sole possession of Defendants.
F 4	In or around Late 2003 or early	Mails, or telephone, fax, and/ or electronic mail	Malvern C. Burnett, Burnett Law Offices, GCILC, Billy	Discussions and transmission of materials related to preparing for Dubai meeting and

	2004	(wires) between New Orleans, Louisiana; Mumbai (Mumbai), India; and/or Dubai, UAE	Wilks, J&M Associates, Michael Pol, ¹ Global Resources, Sachin Dewan, and Dewan Consultants	preparation of contracts and other paperwork to be signed by prospective workers. Specific information regarding these communications is largely in the sole possession of Defendants.
F 5	In or around Late 2003 or early 2004	In-person at Trident Hotel in Kochi, India (First day of three-day seminar)	Sabulal Vijayan, Sachin Dewan, other representatives of Dewan Consultants, Jagdish Dewan (Sachin Dewan's father), Salimon, two Dewan secretaries, other Indian prospective migrant workers	At the meeting, Sachin Dewan said that there were opportunities for pipefitters and welders in the U.S. with Indo-Amerisoft that would lead to permanent residency status. Indo-Amerisoft would arrange for workers to work at shipyards in the U.S. for two years; workers would earn \$18/hour and receive green cards during that two-year period. Sachin Dewan explained that it would take 6-9 months for prospective migrant workers to get visa certification, then I-140 forms would be filed, and then the green card process would be finalized. Sachin Dewan said that workers would be able to come to the U.S. within 12 to 18 months. Sachin Dewan said that the prospective migrant workers would need to pay five lakh rupees (approximately \$12,820 USD) in three installments, extra fees for family members, and an extra 25,000 rupees for Sachin Dewan. Sachin Dewan collected Sabulal Vijayan's original school certificate, trade certificate, and experience certificates.

¹ Claims against Michael Pol, the President of Recruiter Defendant Global Resources, have been stayed pending the outcome of his bankruptcy proceedings. For purposes of this fraud chart, Pol is listed as a witness and as the principle of Global Resources.

				Sachin Dewan also said that Malvern Burnett would handle visa processing. Sachin Dewan said that one-third of fees would go to Malvern Burnett.
F 6	In or around Late 2003 or early 2004.	In-person at Trident Hotel in Kochi, India (second day of three-day seminar)	Sabulal Vijayan, Sachin Dewan	Sachin Dewan asked Sabulal Vijayan to pay for testing. Sabulal Vijayan made his first payment, 1,500 rupees, to Dewan, which was for a pipefitting test that Dewan Consultants administered.
F 7	In or around Late 2003 or early 2004	Banking transactions in UAE and/or India	Sachin Dewan and Dewan Consultants	Deposit of the 1,500 rupees payment presented by Sabulal Vijayan.
F 8	In or around Late 2003 or early 2004	In-person, Kochi, India	Sabulal Vijayan, Kurella Rao	Kurella Rao said that Malvern Burnett worked for his company, Indo-Amerisoft.
F 9	In or around December 2003	Electronic mail, telephone or fax (wires) between Mumbai, India, and Dubai, United Arab Emirates (UAE)	Sachin Dewan or representatives of Dewan Consultants d/b/a Medtech Consulting (“Dewan Consultants”) and Dewan Consultants to Representatives of the <u>Gulf News</u>	Transmission of advertisement to <u>Gulf News</u> indicating offer of an opportunity for work-based permanent residence in the United States.
F 10	In or around last week of December 2003	In-person meeting in offices of Dewan Consultants, Dubai, UAE	“Disha” and Dewan Consultants to Kechuru Dhananjaya	Kechuru Dhananjaya applied for the green card opportunity advertised in the <u>Gulf News</u> and presented his CV. Disha informed him: 1) about the application process and that Sachin Dewan, Kurella Rao, and Malvern Burnett would be coming to the Dubai office on January 18, 2004 to discuss the green card

				opportunity; 2) that it would cost 45,000 dirhams ² total to begin the green card process; and 3) that he should bring the first installment payment of 15,000 dirhams to begin the green card process to the meeting on January 18th.
F 11	From in or around December 2003 through in or around January 18, 2004	Mails, or telephone, fax, and/ or electronic mail (wires) between New Orleans, Louisiana; Mumbai (Mumbai), India; and/or Dubai, UAE	Malvern C. Burnett, Law Offices of Malvern C. Burnett (“Burnett Law Offices”), Gulf Coast Immigration Law Center (“GCILC”), Kurella Rao, Indo-Amerisoft LLC, Sachin Dewan, and Dewan Consultants	Discussions and transmission of materials related to preparing for Dubai meeting and preparation of contracts and other paperwork to be signed at January 18, 2004 meeting. Specific information regarding these communications is largely in the sole possession of Defendants.
F 12	In or around January 2004	In-person at the Dewan Consultants’ d/b/a Medtech Consulting’s office in Dubai, UAE for about seven to eight hours	Sabulal Vijayan, Sachin Dewan, Manish Dewan, Varuna Dewan, ³ Kurella Rao, Malvern Burnett, and female colleagues from Malvern Burnett’s office (upon information and belief those female colleagues could have been Kristi Bowerman, Maria Lao, and/or “Elizabeth”/”Liz”), 30-40 other workers	Kurella Rao said IndoAmerisoft (IAS) sends workers to other companies. He said Sabulal Vijayan would be paid about \$18/hour to work for a U.S. company, like Bollinger. He also said Sabulal Vijayan and others would be required to work for two years. If he did not work for two years, he would need to pay a \$4,500 penalty. During this two-year period, Kurella Rao said Sabulal Vijayan would get his green card and that Sabulal Vijayan would also be able to bring his family to the U.S. Kurella Rao told Sabulal Vijayan that if he did not get his labor certification within 9 months of applying, he would get his money back.

² Dirhams are a unit of currency used in the United Arab Emirates.

³ On information and belief, Varuna Dewan’s married name is Varuna Kapoor. This fraud chart may refer to her by both names.

				<p>Sachin Dewan sought to collect his first installment of the five lakh rupees (500,000) from Sabulal Vijayan: (160,000) rupees.</p> <p>Malvern Burnett had Sabulal Vijayan and other prospective workers fill out various documents and forms, including an I-140 form for a green card, and had the prospective workers provide him with copies of their personal documents. Malvern Burnett said it would take six to nine months to get labor certification, then the I-140 forms would be filed, and then the green card approvals would be processed. Malvern Burnett also wanted Sabulal Vijayan to correct his date of birth on his passport.</p>
F 13	On or about January 18, 2004	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE office	Sachin Dewan, Manesh Dewan, Dewan Consultants, Kurella Rao, IndoAmerisoft LLC, Malvern Burnett, Burnett Law Offices, GCILC, female colleagues from Malvern Burnett's office (upon information and belief those female colleagues could have been Kristi Bowerman, Maria Lao, and/or "Elizabeth"/"Liz"), to Kechuru Dhananjaya and other prospective workers	Sachin Dewan informed workers about the application and the three-step installment payment process for obtaining a green card through Indo-Amerisoft, LLC and its representative, Kurella Rao. Sachin Dewan stated that the process would take a maximum of 18 months to complete and would enable workers to bring their families to the United States with them for an additional fee of \$1,500 per family member. Kurella Rao stated that the workers could relocate to the United States permanently with their own families, perform shipyard work at Bollinger or another similar shipyard, and live independently in apartments with their families. Kechuru

				Dhananjaya made a 13,000 dirham payment to Sachin Dewan in order to start the labor certification part of the green card process. Sachin Dewan said that the labor certification stage would be complete within nine months, and it would take another nine months to finish the entire green card process.
F 14	In or around late January and/or early February 2004	Banking transactions in United States, UAE, and/or India (wires)	Sachin Dewan, Dewan Consultants, Kurella Rao, IndoAmerisoft LLC, Malvern Burnett, Burnett Law Offices, GCILC	Deposit of 13,000 dirhams paid by Mr. Kechuru Dhananjaya on or about January 18, 2004. Specific information regarding deposits of monies and divisions of quantities among participants are known only to Defendants.
F 15	In or around early to mid-March 2004	Electronic mail, telephone or fax (wires) between Dubai, UAE; Mumbai, India; or New Orleans, Louisiana to unknown newspaper in Dubai, UAE	Sachin Dewan and other representatives of Dewan Consultants	Transmission of advertisement indicating offer of opportunity for work-based permanent residence in the United States and announcing informational meetings in March 2004.
F 16	In or around early to mid-March 2004	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, J & M Associates, Sachin Dewan, and other representatives of Dewan Consultants	Discussions and transmission of materials related to March 2004 Dubai, United Arab Emirates (UAE) seminar. Specific information regarding these communications is largely in the sole possession of Defendants.
F 17	In or around mid-to late-March 2004	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE office	Representatives of Dewan Consultants, including Manesh Dewan, Varuna Dewan, and Sachin Dewan to Andrews Issac	The representatives of Dewan Consultants made representations that the prospective migrant workers could obtain a green card in two years or less if they paid approximately 5 lakh rupees (500,000 rupees) over the

			Padavettiyil and 60 -70 interested prospective migrant workers	course of three installments. The representatives of Dewan Consultants instructed the prospective migrant workers to gather the first installment payments of \$1,222 to Michael Pol, \$1,222 to Malvern Burnett, and 4,500 dirhams (approximately \$1,225) to Sachin Dewan in time for next meeting on or around April 15, 2004. The Dewan Consultants representatives also told the prospective migrant workers that Michael Pol and Malvern Burnett were American representatives of the company that the prospective migrant workers would be working for in the United States and that these men would be in charge of processing their immigration applications.
F 18	On or about April 1, 2004	Mails between Mumbai, India and Kerala, India or in-person meeting	Sachin Dewan, other representatives of Dewan Consultants to Jacob Joseph Kadakkarappally	A letter regarding migration was distributed to Jacob Joseph Kadakkarappally. Among other things, the migration letter stated that Jacob Joseph Kadakkarappally had been selected for a permanent residence visa process for J&M Associates, Inc. The migration letter also set forth the required fees prospective employees would be required to pay for processing of the application.
F 19	In or around late-March to mid-April 2004	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, J & M Associates, Sachin Dewan, and other representatives of Dewan Consultants	Discussions and transmission of materials related to April 15, 2004 (on or about) Dubai meeting. Specific information regarding these communications is largely in the sole possession of Defendants.

F 20	On or about April 15, 2004	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE offices	Sachin Dewan, Manesh Dewan, Varuna Dewan, Malvern C. Burnett, Burnett Law Offices, GCILC, female colleagues from Malvern Burnett's office (upon information and belief those female colleagues could have been Kristi Bowerman, Maria Lao, and/or "Elizabeth"/"Liz"), Michael Pol, and Global Resources to Andrews Issac Padavettiyil and other prospective migrant workers	Andrews Issac Padavettiyil paid first installment payments of \$1,222 to Michael Pol, \$1,222 to Malvern Burnett, and 4,500 dirhams to Sachin Dewan. Michael Pol represented that J & M was a good company located in California and would provide good accommodations for workers in the United States and good food. Sachin Dewan further stated that J & M Associates had ship repair work for the workers. Malvern Burnett and Sachin Dewan made representations regarding the green card process, including that the process would take a maximum of two years total to complete. Andrews Issac Padavettiyil received and signed a written document discussing terms and conditions of employment and green card processing, which Michael Pol and Malvern Burnett also signed. A representative of the Burnett Law Offices said these forms were related to visa processing.
F 21	In or around mid-to late-April, 2004	Banking transactions in United States, India, and/or Dubai, UAE	Sachin Dewan, Michael Pol Global Resources, Malvern Burnett, Burnett Offices, GCILC	Deposit of funds collected in first installment payments.
F 22	In or around mid-April through April 30, 2004	Approximately two to three telephone calls by Andrews Issac Padavettiyil in Dubai, UAE, to Dewan Consultants' Dubai, UAE offices (971-4-391-2933) (wires)	Between Varuna Dewan, Manesh Dewan, and other representatives of Dewan Consultants, and Andrews Issac Padavettiyil	Varuna and/or Manesh Dewan informed Andrews Issac Padavettiyil that the paperwork necessary to begin the green card process had been filed and that he did not need to call. They promised that they would call him when they were ready to begin the next stage in the green card process.

F 23	In or around late April 2004	Mails, or telephone, fax, and/ or electronic mail (wires) between New Orleans, Louisiana; Mumbai (Mumbai), India; and/or Kochi, India	Malvern C. Burnett, Law Offices of Malvern C. Burnett, GCILC, Kurella Rao, Indo-Amerisoft LLC, Sachin Dewan, and Dewan Consultants	Discussions and transmission of materials, including the IAS/Kurella Rao promissory note, related to preparing for the Kochi meeting and preparation of contracts and other paperwork to be signed at the late April 2004 meeting. Specific information regarding these communications is largely in the sole possession of Defendants.
F 24	In or around late April 2004	In-person meeting at Trident Hotel in Kochi, India	Sachin Dewan, Michael Pol, Malvern C. Burnett, female colleague or colleagues from Malvern Burnett's office (upon information and belief those female colleagues could have been Kristi Bowerman, Maria Lao, and/or "Elizabeth"/"Liz"), Jacob Joseph Kadakkarappally and other prospective migrant workers	Malvern Burnett, Sachin Dewan, and Michael Pol attended the meeting and described the green card application process, setting out the amount of fees required to be paid by the prospective migrant worker applicants. They said that the prospective migrant workers would go through three stages, first applying for a labor certification, next applying for an I-140 permanent residency visa, and finally applying for an I-485 green card. The prospective migrant workers would pay three installments of approximately equal amounts to each of Malvern Burnett, Sachin Dewan, and Michael Pol. They said that the prospective migrant workers would travel to the United States on green cards and work for J&M Associates for two years and in the third year they could work anywhere.
F 25	In or about April or May 2004	In-person, Dubai office, UAE	Sabulal Vijayan, Representatives of Dewan Associates	Sabulal Vijayan received a promissory note with Kurella Rao's name on it for Sabulal Vijayan's first installment payment.
F 26	In or around mid-May 2004	In-person meeting at Trident Hotel in Kochi, India	Sachin Dewan, Malvern C. Burnett, Jacob Joseph Kadakkarappally and other	Jacob Joseph Kadakkarappally paid a demand draft of approximately \$1,266 to Sachin Dewan for Michael Pol and the

			prospective migrant workers	equivalent amount in rupees to Sachin Dewan, and a demand draft of approximately \$1,266 to Malvern C. Burnett for the first installment payment for the labor certification application. Jacob Joseph Kadakkarappally signed contracts with Sachin Dewan, Michael Pol and Malvern C. Burnett for a green card and a job at J&M Associates.
F 27	In or around mid-May 2004	Banking transactions in United States, India, and/or Dubai, UAE	Sachin Dewan, Michael Pol, Global Resources, Malvern Burnett, Burnett Offices, GCILC	Deposit of funds collected installment payments received from Jacob Joseph Kadakkarappally.
F 28	On or about July 16, 2004	Electronic mail between India and United States	Malvern C. Burnett to Jacob Joseph Kadakkarappally	Malvern Burnett informs Jacob Joseph Kadakkarappally that the PERM labor certification regulations are expected to take effect by October 2004 at the latest, and that the process is on schedule. Mr. Burnett informs Jacob Joseph Kadakkarappally that Dewan Consultants will keep him informed.
F 29	On or about September 7, 2004	Electronic mail within India	Sachin Dewan to Jacob Joseph Kadakkarappally	Sachin Dewan informs Jacob Joseph Kadakkarappally that J&M Associates will give him work at NASCO, and supplies Jacob Joseph Kadakkarappally with NASCO's website.
F 30	In or around August or September 2004	Mails, or telephone, fax, and/ or electronic mail (wires) between New Orleans, Louisiana; Mumbai, India; and/or Dubai, UAE	Sachin Dewan, Dewan Consultants, Kurella Rao, IndoAmerisoft LLC, Malvern Burnett, Burnett Law Offices, and GCILC	Discussions and transmission of materials related to preparing for Dubai meeting to update workers on progress of green card applications. Specific information regarding these communications is largely in the sole possession of Defendants.
F 31	In or about September 24,	In-person visit to Dewan Consultants' d/b/a	Varuna Dewan, Dewan Consultants, and Kechuru	Varuna Dewan gave Kechuru Dhananjaya receipts for the first installment payments he

	2004	Medtech Consulting's offices in Dubai, UAE	Dhananjaya	had made in January 2004.
F 32	In or around September 2004 through in or around January 2006	Numerous telephone calls from Kechuru Dhananjaya (971-4-391-2933) in Dubai, UAE, and approximately 5 to 6 in-person visits by Kechuru Dhananjaya to Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE offices	Between Varuna Dewan of Dewan Consultants and Kechuru Dhananjaya	Varuna Dewan repeatedly stated that the process was delayed, but that Kechuru Dhananjaya would eventually receive a green card.
F 33	In or around September 2004	Telephone call from Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE offices (971-4-391-2933) to Kechuru Dhananjaya in Dubai, UAE	Varuna Dewan, Dewan Consultants to Kechuru Dhananjaya	Varuna Dewan informed Kechuru Dhananjaya that Sachin Dewan was coming to Dewan Consultants' Dubai office in a few days to meet with the green card applicants.
F 34	In or around September 2004	In-person meeting at Dewan Consultants d/b/a Medtech Consulting's offices in Dubai, UAE	Sachin Dewan, Dewan Consultants, and Kechuru Dhananjaya	Sachin Dewan promised that the labor certification was on "fast track" processing and that he would speed up the application because it had been delayed.
F 35	In or around September or October 2004	Mails, or telephone, fax, and/ or electronic mail (wires) between New Orleans, Louisiana; Mumbai, India; and/or Dubai, UAE	Sachin Dewan, Dewan Consultants, Kurella Rao, IndoAmerisoft LLC, Malvern Burnett, Burnett Law Offices, GCILC	Discussions and transmission of materials related to the progress of green card applications and representations to be made to workers regarding the process, including planning for a November meeting in Dubai and preparation of a letter to the workers from Malvern Burnett. Specific information regarding these communications is largely in

				the sole possession of Defendants.
F 36	Between September or October 2004 to in or around January 2006	Monthly (at least) telephone calls by Andrews Issac Padavettiyil in Dubai, UAE, to Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE offices (971-4-391-2933) (wires)	Between Varuna Dewan, Manesh Dewan, Dewan Consultants, and Andrews Issac Padavettiyil	Varuna and Manesh Dewan repeatedly assured Andrews Issac Padavettiyil that processing for his green card was underway and would be complete shortly, but was delayed by Hurricane Katrina and the U.S. presidential election.
F 37	Between September or October 2004 up to early to mid-January 2006	Multiple telephone calls by Andrews Issac Padavettiyil in Dubai, UAE, to Dewan Consultants' d/b/a Medtech Consulting's Mumbai, India offices (91-22-5694-1617) (wires)	Between Sachin Dewan, Dewan Consultants, and Andrews Issac Padavettiyil	Sachin Dewan assured Andrews Issac Padavettiyil that there was nothing to worry about; that the green card process was delayed by Hurricane Katrina and the elections but would go forward soon.
F 38	Between September or October 2004 up to early- to mid-January 2006	Mails, or telephone calls, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Firm, GCILC, Michael Pol, Global Resources, J & M Associates, Sachin Dewan, and other representatives of Dewan Consultants	Discussions related to pending J & M Associates applications for labor certification and representations to be made to applicants regarding the green card process. Specific information regarding these communications is largely in the sole possession of Defendants.
F 39	In or around late-October 2004 or early-November 2004	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's offices in Dubai, UAE	Varuna Dewan or other Dewan Consultants representatives and Kechuru Dhananjaya	Kechuru Dhananjaya was given letter from Malvern Burnett dated October 15, 2004 promising that despite delays in the green card process, applicants would ultimately obtain green cards.
F 40	On or about November 11,	Electronic mail between India and United States	Malvern C. Burnett to Jacob Joseph Kadakkarappally	Malvern Burnett tells Jacob Joseph Kadakkarappally that they are in the middle

	2004			of the recruitment period required for the labor certification application. Malvern Burnett informs Jacob Joseph Kadakkarappally that Dewan Consultants will keep him informed.
F 41	On or about November 25, 2004	Electronic mail within India	Sachin Dewan to Jacob Joseph Kadakkarappally	Sachin Dewan asks Jacob Joseph Kadakkarappally to send his latest contact information
F 42	On or about December 3, 2004	Electronic mail between India and United States	Jacob Joseph Kadakkarappally to Malvern C. Burnett	Jacob Joseph Kadakkarappally asked Malvern Burnett whether Sachin Dewan is correct that Jacob Joseph Kadakkarappally must either take his wife to the United States immediately or else after five years once the green card was processed.
F 43	On or about December 19, 2004	Electronic mail between India and United States	Malvern C. Burnett and Jacob Joseph Kadakkarappally	Malvern Burnett informs Jacob Joseph Kadakkarappally that he will come to the United States as a green card holder and his wife and unmarried children under age 21 can join him after that date.
F 44	In or around May or June 2005	Telephone call from Dewan Consultants' d/b/a Medtech Consulting's Dubai offices (971-4-391-2933) to Kechuru Dhananjaya in Dubai, UAE	Varuna Dewan of Dewan Consultants to Kechuru Dhananjaya	Varuna Dewan informed Kechuru Dhananjaya that the labor certification had been approved and he should prepare to pay the second installment to continue the green card process.
F 45	In or around May, June, or July 2005	Upon information and belief, by telephone.	Sabulal Vijayan, representatives of Dewan Consultants	Dewan Consultants representatives asked Sabulal Vijayan to pay the second installment of the five lakh rupees (500,000) total. Dewan Consultants representatives said that the processing delay was due to Hurricane Katrina, the 2004 presidential election, and the normal filing system had

				been changed to a PERM system which required electronic re-filing. Dewan Consultants representatives told Sabulal Vijayan to go to the Dewan Consultants office with two bank drafts: 1) one for \$2,750 for Kurella Rao/IAS, and 2) one for Malvern Burnett for \$4,500 (for Sabulal Vijayan's wife and two children).
F 46	In or around mid-2005	In-person, Dewan Consultants' d/b/a Medtech Consulting's office, Dubai, UAE	Sabulal Vijayan, Sachin Dewan, 40-50 other prospective migrant workers.	<p>Sachin Dewan said that Sabulal Vijayan and the other workers would need to pay \$1,500 per family member if they wished to bring them to the U.S. Sachin Dewan said it would be better to pay this now because it would otherwise cost \$5,000 per family member. Sachin Dewan said it would take six to nine months for processing.</p> <p>Sachin Dewan told Sabulal Vijayan that he could pay in Kochi, India. Sabulal Vijayan could sign the documents for the I-140s for him and his family there.</p>
F 47	On or about June 22, 2005	Electronic mail between India and United States	Michael Pol and Jacob Joseph Kadakkarappally	Michael Pol informed Jacob Joseph Kadakkarappally that they were uploading labor certification applications to the Department of Labor and that results should arrive in July or August of 2005.
F 48	In or around summer 2005	Electronic mail (wires) between Dewan Associates d/b/a Medtech Consulting in Dubai, UAE; Mumbai, India; or New Orleans, Louisiana; to <u>Khaleej</u>	Representatives of Dewan Associates	Transmission of advertisement indicating permanent residence visa for work in the United States

		<u>Times in UAE</u>		
F 49	In or around Fall 2005	Wires	Malvern C. Burnett, Nicole Homel-Tellier, Billy Wilks	Exchanged drafts of J&M's labor certification applications
F 50	In or around Fall 2005	Wires	Malvern C. Burnett, Nicole Homel-Tellier, Billy Wilks	Labor certification application for Jacob Joseph Kadakkarappally sent to the United States Department of Labor
F 51	On or about December 11, 2005	Electronic mail between India and United States	Michael Pol and Jacob Joseph Kadakkarappally	Michael Pol tells Jacob Joseph Kadakkarappally that the labor certification process should be finished in the near future and that Hurricane Katrina had slowed the process.
F 52	In or around December 2005 through February 2006	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana, and Mumbai, India	Sachin Dewan, other representatives of Dewan Consultants, Kurella Rao, Indo-Amerisoft LLC, Malvern Burnett, Burnett Law Offices, GCILC, Global Resources	Discussions and transmission of materials related to progress of green card applications and representations to be made to workers regarding the process, including planning for a February 2006 meeting in Dubai and preparation of a letter addressed to Kechuru Dhananjaya from Dewan Consultants, dated January 21, 2006, listing payments and paperwork to be submitted by green card applicants. Specific information regarding these communications is largely in the sole possession of Defendants.
F 53	In or around the first week of January 2006	Phone call from Varuna Dewan at Dewan Consultants' d/b/a Medtech Consulting's offices in Dubai, UAE (971-4-391-2933) to Kechuru Dhananjaya in Dubai, UAE	Varuna Dewan of Dewan Consultants to Kechuru Dhananjaya	Varuna Dewan called to inform Kechuru Dhananjaya that Kurella Rao was coming to Dubai to discuss the green cards on February 6, 2006 and that Kechuru Dhananjaya would need to prepare his second installment payment. Varuna Dewan instructed Kechuru Dhananjaya to come to the Dubai office soon for further instructions.
F 54	On or about January 3, 2006	Electronic mail between India and United States	Malvern C. Burnett to Jacob Joseph Kadakkarappally	Malvern Burnett informs Jacob Joseph Kadakkarappally that 130 of J&M

				Associates' 240 labor certification applications have been approved. Malvern Burnett informs Jacob Joseph Kadakkarappally that Malvern Burnett and Sachin Dewan will have meetings in India and Dubai from February 8 – 22, 2006 to meet with J&M Associates applicants. Malvern Burnett tells Jacob Joseph Kadakkarappally to stay informed through Sachin Dewan.
F 55	On or about January 3, 2006	Electronic mail within India	Sachin Dewan to Jacob Joseph Kadakkarappally	Sachin Dewan informs Jacob Joseph Kadakkarappally that his labor certification application has been approved. Sachin Dewan tells Jacob Joseph Kadakkarappally that Malvern Burnett will be in India during February 2006 for the next step of the process.
F 56	In or about sometime in early 2006	Dubai, UAE	Sabulal Vijayan	Sabulal Vijayan procured a \$2,750 draft made out to IAS.
F 57	In or about sometime in early 2006	In-person, Kerala, India	Sabulal Vijayan	Sabulal Vijayan procured a \$4,500 draft in Malvern Burnett's name from his bank in Kerala.
F 58	In or about sometime in early 2006	In-person, Salimon's office, Kochi, India	Sabulal Vijayan, Sachin Dewan, and possibly Malvern Burnett	Sabulal Vijayan paid the second installment fees (drafts for IAS and Malvern Burnett) to Sachin Dewan. Sachin Dewan gave Sabulal Vijayan a receipt signed by Kurella Rao, even though Kurella Rao was not present at the time. Sachin Dewan said that Sabulal Vijayan's immigration papers were filed. Sachin Dewan said that 1/3 of the five lakh rupees were for Sachin Dewan, 1/3 was for IAS and Kurella Rao, and 1/3 was for

				Malvern Burnett. Dewan said he would get 40,000 rupees on top of his 1/3 cut (which was more than the 25,000 rupees Sachin Dewan originally said in the first meeting in Kochi, India).
F 59	In or about sometime in early 2006	Banking transactions in United States, India, and/or Dubai, UAE	Sachin Dewan, Dewan Consultants Michael Pol, Global Resources, Malvern Burnett, Burnett Offices, GCILC	Deposit of funds collected from Sabulal Vijayan in second installment fees.
F 60	In or around early to mid-January 2006	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, J&M Associates, Sachin Dewan, and Dewan Consultants	Discussions related to receipt of January 6, 2006 labor certification approval notice from USDOL, preparation and transmission of letter from Sachin Dewan to green card applicants dated January 24, 2006, and representations to be made to applicants regarding the labor certification approval and green card process. Specific information regarding these communications is largely in the sole possession of Defendants.
F 61	In or around Mid-January 2006	Telephone call from Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE office (971-4-391-2933) to Andrews Issac Padavettiyil in Dubai, UAE	Varuna Dewan of Dewan Consultants to Andrews Issac Padavettiyil	Varuna Dewan stated to Andrews Issac Padavettiyil that his labor certification had been approved and the next step of the green card process was underway.
F 62	In or around Late-January 2006	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE office	Varuna Dewan, Dewan Consultants, Andrews Issac Padavettiyil, and Kechuru Dhananjaya	Andrews Issac Padavettiyil received copy of letter from Sachin Dewan dated January 24, 2006 indicating that the labor certification for J & M Associates had been approved and that the green card process had been delayed

				but was moving forward. Varuna Dewan instructed Andrews Issac Padavettiyil to prepare the second installment payments as soon as possible. Varuna Dewan gave Kechuru Dhananjaya a letter from Dewan Consultants dated January 21, 2006 listing payments and paperwork to be submitted and explained the letter to him. Varuna Dewan instructed Kechuru Dhananjaya to return to the Dewan Consultants' Dubai office on February 6, 2006 with the second installment payments and documents described in the letter.
F 63	Between in or around January 2006 and in or around October 2006	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, J & M Associates, Sachin Dewan, Dewan Consultants	Discussions and transmission of materials related to workers' green card applications sponsored by J & M Associates. Specific information regarding these communications is largely in the sole possession of Defendants.
F 64	On or about February 2-3, 2006	Phone call from Varuna Dewan at Dewan Consultants' d/b/a Medtech Consulting's offices in Dubai, UAE (971-4-391-2933) to Kechuru Dhananjaya in Dubai, UAE	Varuna Dewan of Dewan Consultants to Kechuru Dhananjaya	Varuna Dewan reminded Kechuru Dhananjaya to come to the February 6, 2006 meeting at Dewan Consultants' Dubai office and bring his second installment payments.
F 65	On or about February 6, 2006	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's offices in Dubai, UAE	Sachin Dewan, Manesh Dewan, Kurella Rao, IndoAmerisoft LLC, and Kechuru Dhananjaya	Kechuru Dhananjaya was given an "Annexure," which he was required to sign to proceed with the recruitment process, acknowledging that the green card process was delayed. Kurella Rao and Sachin Dewan said that the applicants would receive

				their green cards within nine months. Sachin Dewan stated that the applicants must pay the second installment payments within fifteen days.
F 66	On or around February 6, 2006	Mail within India	Sachin Dewan to Jacob Joseph Kadakkarappally	Sachin Dewan informs Jacob Joseph Kadakkarappally that his labor certification has been approved and that it is time to pay the second installment. The letter sets out the amounts of the second installment and directs Jacob Joseph Kadakkarappally to attend a meeting at the Trident Hotel in Kochi to sign further paperwork.
F 67	On or around February 8 – 11, 2006	Electronic mails between India and Saudi Arabia	Sachin Dewan and Jacob Joseph Kadakkarappally	Sachin Dewan approves Jacob Joseph Kadakkarappally sending the second installment payment the first week in March to Salimon.
F 68	On or around February 13 and 18, 2006	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE office	Varuna Dewan, Manesh Dewan, Sachin Dewan, Dewan Consultants to Andrews Issac Padavettiyil	Andrews Issac Padavettiyil presented the second installment payments to Manesh Dewan on February 13, 2006, an Ahalia Exchange Bureau draft of \$1,225 to Michael Pol and an Ahalia Exchange Bureau draft of \$1,225 to Malvern Burnett.
F 69	On or around February 15, 2006	In-person meeting at Trident Hotel in Kochi, India	Sachin Dewan, Michael Pol, Malvern C. Burnett and prospective migrant workers	Sachin Dewan and Malvern Burnett take second installment payments from prospective migrant workers.
F 70	On or about February 18, 2006	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's offices in Dubai, UAE	Varuna Dewan, Dewan Consultants, Kechuru Dhananjaya, and Andrews Issac Padavettiyil	Kechuru Dhananjaya presented to Varuna Dewan a Thomas Cook Exchange draft of \$2,650 to Indo-Amerisoft LLC and a Standard Chartered draft of 3,700 dirhams to Dewan Consultants. Andrews Issac Padavettiyil presented to Varuna Dewan a Canara Bank draft of 55,555 rupees to Sachin Dewan. Varuna Dewan gave

				Andrews Issac Padavettiyil a copy of the January 6, 2006 notice from USDOL regarding approval of J & M Associates' labor certification application. Sachin, Manesh, and Varuna Dewan assured Andrews Issac Padavettiyil that the final stage of the green card processing would begin immediately and the process would be complete within a year.
F 71	In or around Mid-February 2006	Banking transactions in United States, India, and/or Dubai, UAE	Sachin Dewan, Dewan Consultants Michael Pol, Global Resources, Malvern Burnett, Burnett Offices, GCILC	Deposit of funds collected on or about February 13-18, 2006 from prospective migrant workers in second installment fees.
F 72	On or about February 25-26, 2006	Electronic mails between India and United States, with further reference to electronic mail sent within the United States	Michael Pol, Global Resources (communicating directive of Malvern Burnett) and Jacob Joseph Kadakkarappally	Michael Pol telling Jacob Joseph Kadakkarappally his labor certification has been approved and that the second installment payment must be made by the end of the week or Jacob Joseph would be removed from the list of eligible workers.
F 73	In or around late February or early March 2006	Banking transactions in UAE, India, and/ or United States (wires)	Kurella Rao and Indo-Amerisoft LLC	Deposit of \$2,650 draft paid by Kechuru Dhananjaya.
F 74	In or around late February or early March 2006.	Banking transactions in UAE and/or India	Sachin Dewan and Dewan Consultants	Deposit of the 3,700 dirhams Standard Chartered bank draft presented by Kechuru Dhananjaya and the 55,555 rupees Canara Bank Draft paid by Andrews Issac Padavettiyil.
F 75	In or around late February or early March 2006	Salimon's office in Pamba, Kerala	Salimon & the brother of Jacob Joseph Kadakkarappally	Jacob Joseph Kadakkarappally's brother paid Salimon the second installment payment of approximately \$1,266 each to Sachin Dewan, Michael Pol, and Malvern Burnett.
F 76	In or around late	Banking transactions in	Sachin Dewan, Dewan	Deposit of funds collected from Jacob Joseph

	February or early March 2006	United States, India, and/or Dubai, UAE	Consultants Michael Pol, Global Resources, Malvern Burnett, Burnett Offices, GCILC	Kadakkappally in second installment fees.
F 77	Between in or around mid-February 2006 and in or around August 2006	Two to three phone calls by Andrews Issac Padavettiyil in Dubai, UAE, to Dewan Consultants' Mumbai, India offices (91-22-5694-1617) (wires)	Andrews Issac Padavettiyil to Sachin Dewan of Dewan Consultants	Sachin Dewan stated that the green card would be processed soon.
F 78	Between in or around mid-February 2006 and in or around August 2006	Two to three phone calls by Andrews Issac Padavettiyil in Dubai, UAE, to Dewan Consultants' Dubai, UAE offices (971-4-391-2933) (wires)	Andrews Issac Padavettiyil to Varuna Dewan and Dewan Consultants	Varuna Dewan assured Andrews Issac Padavettiyil that the green card process was moving forward.
F 79	From in or around February 2006 through in or around October 2006	Multiple calls and visits from Kechuru Dhananjaya in Dubai, UAE, to Dewan Consultants offices (971-4-391-2933) in Dubai, UAE	Varuna Dewan and Manesh Dewan of Dewan Consultants and Kechuru Dhananjaya	Manesh and Varuna Dewan repeatedly reassured Kechuru Dhananjaya that he would receive a green card soon.
F 80	On or about April or May 2006	Electronic mail (wires)	Dewan Associates in Dubai, UAE, Mumbai, India, or New Orleans, Louisiana to <u>Daily Thanti</u> or <u>Dhina Thanti</u> in Tamil Nadu, India	Transmission of advertisement indicating permanent residence visa for work in the United States and announcing May 2006 introductory seminar.
F 81	In or around April 2006	Mails, or electronic mail (wires)	Dewan Associates in Dubai, UAE, Mumbai, India, or New Orleans, Louisiana to	Transmission of advertisement (1) indicating permanent residence visa for welders and fitters to work in the United States; (2)

			<u>Malayalam Manorma</u> newspaper in Kerala, India	promising \$112 - \$144 per day and a 2 year contract; (3) indicating that transportation would be provided; and (4) announcing dates of May 1,2,3 in Kochi for introductory seminars.
F 82	In or around April 2006	Telephone call by Sony Sulekha to 0481-250-7977, Dewan Consultants. (wires)	Salimon on behalf of Dewan Consultants and Sony Sulekha	Salimon informed Sony Sulekha of recruiting seminar in Kochi.
F 83	On or about April and/or May 2006	Mails or electronic mail (wires)	Signal International, Malvern C. Burnett, Michael Pol, and Sachin Dewan	Transmission of video, photographs, and other materials for Dubai, UAE and Kochi, India seminars. Specific information regarding these communications is largely in the sole possession of Defendants.
F 84	On or about April and/or May 2006	Telephone, electronic mail (wires)	Signal International, Malvern C. Burnett, Michael Pol, and Sachin Dewan	Communications to plan and coordinate Dubai and Abu Dhabi, UAE, and the Kochi, India seminars. Specific information regarding these communications is largely in the sole possession of Defendants.
F 85	On or about May 2, 2006	In-person meeting, Kochi, India.	Salimon, Sachin Dewan, Michael Pol and Sony Sulekha	Seminar in Kochi where workers were shown presentation, including still photographs, of Signal International's facilities. Dewan told workers they would receive a green card in less than 24 months and that it would cost 7 lakh rupees. Representative of Dewan gave Sony Sulekha and other workers the internet address for Signal's website and suggested that Sulkeha review the website to assess whether the company was legitimate.
F 86	In or around beginning of May 2006	Signal International computer server to Internet café in Kerala,	Signal International to Sony Sulekha	Transmission of Signal International website.

		India		
F 87	On or about May 6, 2006.	Telephone call from 0481-250-7977 to Sony Sulekha	Salimon, on behalf of Dewan Consultants, to Sony Sulekha	Salimon informed Sony Sulekha about the upcoming schedule, fees, and requirements for the skills testing to be conducted in coordination with Signal International LLC.
F 88	On or about May 7, 2006	Telephone call from Sony Sulekha to Salimon 0481-250-7977	Sony Sulekha to Salimon, on behalf of Dewan Consultants	Salimon confirmed the location, time, and logistics of the skills test.
F 89	On or about May 9, 2006	Electronic mail (wires)	Dewan Associates in Dubai, UAE, Mumbai, India, or New Orleans, Louisiana to <u>Gulf News</u> in Dubai, UAE	Transmission of advertisement (1) indicating permanent residence visa for welders and fitters to work in the United States; (2) promising \$112 - \$144 per day; (3) indicating that transportation would be provided; and (4) announcing dates of May 14-15, 2006 in Dubai and May 16-17, 2006 for Abu Dhabi for introductory seminars.
F 90	On or about May 10, 2006	Meeting at CJX Trade Center in Ernakalum, India.	Salimon, on behalf of Dewan Consultants, and Sony Sulekha	Sony Sulekha performed welding test and was told that he passed. Salimon stated that Signal executives would conduct additional testing in India at a future date to be announced.
F 91	In or around. mid-May 2006	Telephone call from Sony Sulekha to 944-72-59191	Salimon, on behalf of Dewan Consultants, to Sony Sulekha	Salimon informed Sony Sulekha that Signal executives were in Dubai but that their schedule in Kerala was not yet determined.
F 92	In or around end of May 2006	Telephone call from 944-72-59191 to Sony Sulekha	Salimon, on behalf of Dewan Consultants, to Sony Sulekha	Salimon instructed Sony Sulekha to appear for the skills test with Signal executives in early June. He instructed Sony Sulekha to bring documents showing that he passed the initial test.

F 93	On or about May 16, 2006	In-person meeting at Elite Meridian Hotel in Abu Dhabi, UAE, with video projection (possibly wires)	Sachin Dewan, Malvern C. Burnett, Michael Pol, and Signal International (by video projection), Kurian David, and other prospective Signal employees	<p>Seminar, which Kurian David and others attended, introducing the work and facilities at Signal International, requirements for permanent residency visa, and fees for obtaining employment at Signal and visa.</p> <p>Sachin Dewan said that he could get Kurian David and the other workers employment-based green cards in the U.S. in two years' time for 50,000 dirhams (approximately \$13,500). He explained that this amount covered fees for Sachin Dewan, Malvern Burnett, Michael Pol, and the visa process. He said the amount was to be paid in three installments.</p> <p>Malvern Burnett explained that the green card process typically took about two years, but Signal applied for H-2B visas, which would make it possible to go to the U.S. earlier. Burnett said that H-2B visas would be extended twice and that Kurian David and the other workers would have green cards within 24 months. Burnett explained that Kurian David and the other workers would receive at least \$18/hr for 40 hrs/wk of work; Burnett also said that Kurian David and the others would receive overtime if they worked over 40 hours per week. Video provided an introduction to the accommodations, the worksite, and the work that would be performed at Signal.</p>
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F 94	On or about May 22, 2006	Electronic mail (wires)	Bill Bingle (Signal V.P.) and Michael Pol	Communications in email string between Bill Bingle and Michael Pol, in which Michael Pol drew distinction between green card candidates and other recruits
F 95	On or about May 26, 2006	In-person at Dewan Consultants' d/b/a Medtech Consulting's office in Media City, Dubai, UAE	Representative of Dewan Consultants and Kurian David	Representative of Dewan Consultants requested Kurian David's name, address, telephone number, and trade, and then instructed Kurian David to go to the Alnullah Marine Engineering Workshop in Dubai.
F 96	On or about May 26, 2006	In-person, at Alnullah Marine Engineering Workshop in Dubai, UAE	Two representatives of Signal International (upon information and belief, one was Henry Masten), Sachin Dewan or Manish Dewan, Malvern Burnett, and Kurian David	<p>Kurian David took a written pipe-fitter skills test. One of the Signal representatives compared Kurian David's answers with a template, and told Kurian David he had passed and was selected to work for Signal. Kurian David then went to a meeting with Sachin Dewan, Manesh Dewan, and the two Signal representatives in an office inside the Alnullah Marine Engineering Workshop building. Sachin Dewan and Malvern Burnett explained the following in English, with the Signal representatives present:</p> <ul style="list-style-type: none"> • The applicants would receive a green card, but it would take 24 months. • After getting the green card, the applicants would be able to bring their spouses, minor children, and parents to the United States. • The charges for getting the green card would be 40,500 dirham, payable in three separate installments. • In the meantime, they could get an H-2B visa if they were willing to pay an additional 5,000 dirham. Sachin Dewan

				<p>characterized the 5,000 dirham as a non-refundable “application fee” that went to the United States government.</p> <ul style="list-style-type: none"> • The H-2B visa would be valid for 10 months, but it would be renewed twice, for a total of 30 months. Because the green card process would take 24 months, Sachin Dewan assured the workers they would get their green cards while employed at Signal on the H-2B visas. • The applicants would have to pay a 2,000 dirham “advance” within one week. • The first installment of 13,500 dirham would have to be paid within two months. • The second and third installments, totaling 27,000 dirham, would have to be paid together before leaving. • Airfares, medical exams, and government fees would have to be paid on top of the recruitment fees. <p>One of the Signal representatives told the applicants that they would get a letter in the mail indicating that they had passed the test.</p>
F 97	In or around May 2006	In person, Dewan Consultancy office in Dubai, UAE	Kurian David, Malvern Burnett, Pol, Dewan, and 20 or 25 other people	Kurian David signed an “Employment Agreement” and 3 or 4 other documents.
F 98	On or about May 27-31, 2006	Mails or electronic mail (wires)	Sachin Dewan in Mumbai, India to Salimon, likely in Chennai, India	Transmission of job application materials and written testing materials for distribution to and from prospective Signal employees at May 28-30, 2006 seminars.
F 99	On or about May 29, 2006	In-person at D’Silva Engineering Works, Chennai, India	Salimon and Sachin Dewan on behalf of Dewan Consultants; two male	Introductory seminar. Salimon, who was at the front desk, told Muruganantham Kandhasamy, “this is green card processing”

			representatives of Signal International; upon information and belief, Michael Pol; and Muruganantham Kandhasamy	and told him to go inside for a skills test. Salimon told Muruganantham Kandhasamy that if he passed the skills test, he would receive more details about the process. Muruganantham Kandhasamy took a written test. Sachin Dewan told him he passed the test and the male representative of Signal International told Muruganantham Kandhasamy that he did a good job, that he is ready to fly to America, and that he should talk to Salimon to get the details about the rest of the process. Salimon told Muruganantham Kandhasamy that he passed the test, and that the green card process would cost 600,000 rupees (approximately \$13,300 USD). Salimon told Muruganantham Kandhasamy to get his resume, and that he would receive a phone call regarding the next steps.
F 100	On or about May 30, 2006	In-person at Desilva Engineering Works, Chennai, India	Salimon on behalf of Dewan Consultants and Palanyandi Thangamani.	Meeting. In response to advertisement offering green card and job in the U.S., Palanyandi Thangamani submitted a copy of passport, photos, experience certificate, and biographical information
F 101	On or about May 30, 2006	In-person at Desilva Engineering Works, Chennai, India	Foreman from Signal International, Salimon on behalf of Dewan Consultants, and Palanyandi Thargamani	Skills test for employment at Signal International. Signal foreman asked for Palanyandi Thangamani's name and wrote it in a book. The Signal foreman informed Palanyandi Thangamani that he passed the welding skills test. Salimon informed him that the total cost for the job with Signal would be 6 lakh rupees and that he would be called by a representative of Dewan

				Consultants with instructions regarding the next steps in the application process.
F 102	On or about May and/or June 2006	Mails, or electronic mail and/or Internet	U.S. Customs and Immigration Services to Dewan Consultants	Transmission of USCIS forms for completion by Kurian David and transcription by a representative of Dewan Consultants.
F 103	In or around late May and early June of 2006	Mail, electronic transmission, and/or fax	Malvern C. Burnett, Gulf Coast Immigration Law Center L.L.C., and Law Offices of Malvern C. Burnett, A.P.C. (on behalf of Signal), the Mississippi Department of Employment Security, the Texas Workforce Commission, and the United States Department of Labor	Malvern C. Burnett, Gulf Coast Immigration Law Center L.L.C., and Law Offices of Malvern C. Burnett, A.P.C. filed with the Mississippi Department of Employment Security, the Texas Workforce Commission, and the United States Department of Labor by mail, electronic transmission, and/or fax the completed forms ETA 750 and attachments seeking permission to import and hire 590 foreign guestworkers under 8 U.S.C. § 1101(a)(15)(H)(ii)(b), attendant regulations 8 C.F.R. § 214.2(h)(6) and 20 C.F.R. § 655.3, and associated administrative letters and/or guidance (commonly known as “the H-2B guestworker program”). In the applications to the state workforce commissions and forms ETA 750, Malvern C. Burnett and Signal stated that Signal would employ workers from October 1, 2006 to July 31, 2007, despite their knowledge that the projected labor need would be at least two-to-three years. Signal stated in letters of support to these applications that its need for H-2B guestworkers was “peak load and a one-time occurrence” and that “the temporary workers will work for the length of the prescribed dates of need, will be paid

				in accordance with the prevailing wage, and will return to their home country at the end of employment.” Signal executives and Malvern Burnett signed these applications swearing, under penalty of perjury, to the veracity of the information in these applications.
F 104	In or around beginning of June 2006	Meeting at CJX Trade Center in Ernakalum, India.	Sachin Dewan, Signal Pipe Superintendent and Welding General Foreman, and Sony Sulekha	Sony Sulekha performed the test supervised by Signal. Salimon informed him that he had passed.
F 105	In or around June 2006	Telephone from 944-72-59191 to Sony Sulekha	Salimon, on behalf of Dewan Consultants to Sony Sulekha	Salimon directed Sony Sulekha to complete additional paperwork and asked him to provide experience certificates, birth and marriage certificates, and photographs.
F 106	In or around June 2006	Meeting at CJX Trade Center in Ernakalum, India.	Salimon, on behalf of Dewan Consultants, and Sony Sulekha	Sony Sulekha returned and completed paperwork under the direction and review of Salimon. Salimon told Sony Sulekha that the paperwork was necessary for green card processing.
F 107	In or around beginning of June 2006	Meeting at CJX Trade Center in Ernakalum, India.	Sachin Dewan, Signal Pipe Superintendent and Welding General Foreman, and Sony Sulekha	Sony Sulekha performed the test supervised by Signal. Salimon informed him that he had passed.

F 108	On or about June 2, 2006	Mail, fax, or electronic mail (wires)	Bill Bingle (Signal V.P.)	Bill Bingle signed labor certification to USDOL under penalty of perjury stating that Signal expected to employ the foreign labor from Oct. 1, 2006 until July 31, 2007 (or ten months).
F 109	On or about May or June 2006	Mails or electronic mail (wires)	Sachin Dewan in Mumbai, India to Salimon, likely in in Chennai, India	Transmission of family information and form letter entitled "Sub: Migration for United States of America Signal International" ("migration letter") and biographical information form for distribution to Palanyandi Thangamani, Muruganantham Kandhasamy, and other prospective Signal employees.
F 110	On or about June 2, 2006	Call from 94472-59191 or 91-22-5694-1618 to Mr. Kandhasamy's mobile phone	Salimon on behalf of Dewan Consultants to Muruganantham Kandhasamy	Call to inform Muruganantham Kandhasamy that he had been selected for the green card program. Coordinated sending of fax to Muruganantham Kandhasamy regarding requirements. Salimon told Muruganantham Kandhasamy to return to Chennai on June 23, 2006.
F 111	On or about June 2, 2006	Fax from 5690-2077 or 2851-2312 to public fax in Neyveli, India	Salimon on behalf of Dewan Consultants to Muruganantham Kandhasamy	Fax transmission of letter explaining the papers and documents required for the green card program.
F 112	On or about June 2, 2006	Telephone from 971-505-505 or 971-4-391-2933 or 971-4-391-5504 to 971-2-312-9670 (wires)	Representative of Dewan Consultants to Kurian David and others who passed the trade test	Call to arrange meeting for completion of employment application and collection of initial fee.
F 113	On or about June 8, 2006	In-person in Dubai, UAE	Representative of Dewan Consultants and Kurian David	Dewan Consultants representative collected the 2,000 dirham initial installment advance fee and provided Kurian David with U.S. government forms for Kurian David to complete. The forms included a non-

				immigrant visa application, a form authorizing Malvern C. Burnett to be legal counsel for Kurian David for his immigration application, and a longer form requesting biographical and family information. Kurian David gave the completed forms to the representative and Dewan Consultants. The Dewan representative told Kurian David that she would type the forms and contact him so he could sign them.
F 114	On or about June 8, 2006	Banking transaction (wires)	Representative of Dewan Consultants to bank	Deposit of 2,000 dirham paid by Kurian David on/about June 8, 2006.
F 115	Two occasions between on or about June 8 and 23, 2006	Telephone from 971-505-505 or 971-4-391-2933 or 971-4-391-5504 to 971-2-312-9670 (wires), and in person at Dewan Consultants office in Dubai, UAE	Representative of Dewan Consultants to Kurian David	Calls to request that Kurian David go to Dewan Consultants office to sign typed/transcribed USCIS forms. Both times, there were errors in the forms and the representative of Dewan Consultants told Mr. David she would retype the forms and call him.
F 116	On or about June 12, 2006 and July 26, 2006	Mail, fax, or electronic mail (wires)	Bill Bingle (Signal V.P.), Thomas Rigolo (Signal Senior V.P.) and Malvern Burnett	Thomas Rigolo signed a letter to USCIS Vermont Service Center in St Albans, VT, which was prepared by Malvern Burnett to accompany H-2B petitions for 110 welders and 190 fitters. Bill Bingle signed a letter to USCIS in Vermont to accompany H-2B petitions for 110 welders and 180 fitters. The letters stated that the foreign labor would not become permanent members of the work

				force, and that they would be paid the prevailing wage and return to their home country at the end of the employment term.
F 117	On or about June 13, 2006	Mail, fax, or electronic mail (wires)	Thomas Rigolo (Signal Senior V.P.)	Thomas Rigolo signed labor certification to USDOL under penalty of perjury stating that Signal expected to employ the foreign labor from Oct. 1 2006 until July 31, 2007 (or ten months).
F 118	On or about June 16, 2006	Call from 94472-59191 or 91-22-5694-1618 to 99472-59191 (wires)	Salimon on behalf of Dewan Consultants to Palanyandi Thargamani	Call to Palanyandi Thargamani instructing him to bring 20,000 rupees to Desilva Engineering Works and to submit to medical tests at Gulf Medical Center in Chennai.
F 119	On or about June 20, 2006	Electronic mail within India	Sachin Dewan, Dewan Consultants, Salimon, and Jacob Joseph Kadakkarappally	Sachin Dewan informs Jacob Joseph Kadakkarappally that his labor certification application should be completed by early July with results arriving 45 days later.
F 120	On or about June 23, 2006	Telephone from 971-505-505 or 971-4-391-2933 or 971-4-391-5504 to 971-2-312-9670 (wires)	“Rajesh” or other representative of Dewan Consultants to Kurian David	Call to inform Kurian David of meeting with Malvern C. Burnett and Sachin Dewan scheduled for on/about June 27, 2006.
F 121	On or about June 23, 2006	In-person meeting at Desilva Engineering Works, Chennai, India	Salimon on behalf of Dewan Consultants, Palanyandi Thangamani, Muruganantham Kandhasamy, and other prospective Signal employees	<ul style="list-style-type: none"> • Palanyandi Thangamani, Muruganantham Kandhasamy, and other prospective Signal employees paid the 20,000 rupees initial recruitment fee installment. Muruganantham Kandhasamy asked for a receipt. Salimon told him that if he wanted a receipt, he would have to pay more for taxes. • Palanyandi Thangamani, Muruganantham Kandhasamy, and other prospective Signal employees also completed a biographical/family information form. As Muruganantham Kandhasamy was

				<p>completing the form, Salimon told him, “Get it right. This is for a green card.”</p> <ul style="list-style-type: none"> • The migration letter was distributed to Palanyandi Thangamani, Muruganantham Kandhasamy, and other prospective Signal employees. Among other things, the migration letter promised that Signal International “shall proceed with your H-2B visa & employment based permanent residence visa for United States of America.” The migration letter also set forth the required fees prospective employees would be required to pay for processing of the application. • Salimon told Palanyandi Thangamani that it would cost him 6 lakh rupees to move forward with the application process. Salimon also told Palanyandi Thangamani that he would be paid \$18 per hour, more for overtime, and that he would receive food and lodging from Signal free of charge.
F 122	On or about June 24, 2006	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of 20,000 rupees paid by Palanyandi Thangamani, Muruganantham Kandhasamy, and other prospective Signal employees on/about June 23, 2006.
F 123	On or about June 27, 2006	In-person at Dewan Consultants’ d/b/a Medtech Consulting’s office in Dubai, UAE	Sachin Dewan, Malvern C. Burnett, Kurian David, and other prospective Signal employees	Meeting to inform workers about the green card requirements, including the fees that would be charged by Malvern C. Burnett, Michael Pol, and Sachin Dewan. Mr. Burnett explained the same matters that were explained during the May 27, 2006 (on/about) meeting, and gave Kurian David a brochure describing the Signal facilities. It

				was also at this meeting that Kurian David signed the final corrected versions of the USCIS forms.
F 124	In or around mid-June or early-July 2006	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE offices	Varuna Dewan, Dewan Consultants, and Andrews Issac Padavettiyil	Varuna Dewan assured Andrews Issac Padavettiyil that the green card process was moving forward and would be successful and that it was fine to quit his Dubai job and return to India because the green card would be processed.
F 125	In or around early July 2006	Telephone call by Andrews Issac Padavettiyil in Dubai, UAE, to Dewan Consultants' d/b/a Medtech Consulting's Dubai, UAE offices (971-4-391-2933) (wires)	Varuna Dewan of Dewan Consultants to Andrews Issac Padavettiyil	Varuna Dewan again assured Andrews Issac Padavettiyil that the green card process would be successful and that it was fine to quit his Dubai job and return to India because the green card would be processed.
F 126	On or about July 20, 2006 and August 17, 2006	Mail, electronic transmission, and/or fax	The United States Department of Labor, Signal, Malvern C. Burnett	The United States Department of Labor sent approval notices to Signal and Malvern C. Burnett for Signal's labor certification applications for 590 H-2B workers for the period of October 1, 2006 through July 31,

				2007.
F 127	On or about July 31, 2006	Telephone from 971-505-505 or 971-4-391-2933 or 971-4-391-5504 to 971-2-312-9670 (wires)	“Rajesh” or other representative of Dewan Consultants to Kurian David	Call to inform Kurian David of meeting scheduled with Sachin Dewan for on/about August 3, 2006 to pay first installment of recruitment fee.
F 128	In or around July 2006	Mail	Dewan Consultants to Sony Sulekha	Sony Sulekha received a letter from Dewan Consultants dated June 23, 2006 explaining the payment schedule and requiring him, <i>inter alia</i> , to pay demand drafts in the dollar equivalent of 66,700 rupees to each of Malvern Burnett and Michael Pol.
F 129	In or around July 2006	Telephone call from Sony Sulekha to 944-72-59191	Sony Sulekha to Salimon, on behalf of Dewan Consultants	Upon Sony Sulekha’s inquiry regarding the June 23, 2006 letter, Salimon explained that “H2B processing, 6 months” meant a temporary visa while the green card processing continued.
F 130	In or around late July or early August 2006	In-person meeting in Dewan Consultants’ Mumbai, India offices	Sachin Dewan of Dewan Consultants and Andrews Issac Padavettiyil	Sachin Dewan promised Andrews Issac Padavettiyil that the green card would be ready by October 2006.
F 131	On or about July 28, 2006 and August 25, 2006	Mail, electronic transmission, and/or fax	Malvern C. Burnett, Signal, Bill Bingle, Thomas Rigolo, the United States Citizenship and Immigration Service	Malvern C. Burnett on behalf of Signal filed with the United States Citizenship and Immigration Service by mail, electronic transmission, and/or fax the completed I-129 forms and attachments seeking 590 H-2B visas. In these H-2B visa applications, Signal attested to a 10-month labor need running from October 1, 2006 – July 31, 2007, although it knew its projected labor need was at least two-to-three years. Signal falsely

				represented to the government that at the end of this 10 month period, it intended to return all H-2B beneficiaries to their home country. Malvern C. Burnett declared that the applications were based on all information of which he had any knowledge despite the fact that he believed that Signal's intentions for these workers exceeded ten months. Thomas Rigolo signed USCIS documents under penalty of perjury indicating Signal's intent to employ foreign labor for only 10 months. Bill Bingle also signed a letter of support under penalty of perjury as an attachment to the applications.
F 132	In or around beginning of August 2006	Telephone call from 944-72-59191 to Sony Sulekha	Salimon, on behalf of Dewan Consultants to Sony Sulekha	Salimon instructed Sony Sulekha to bring the first installment payments for Malvern Burnett, Michael Pol, and Sachin Dewan to the Hilton Hotel in Ernakulam where the American lawyer will collect fees and paper files from Dewan Consultants.
F 133	On or about August 3, 2006	In-person at Dewan Consultants' d/b/a Medtech Consulting's office in Dubai, UAE	"Rajesh" and other Dewan Consultants representative and Kurian David	Kurian David arrived with over 18,000 dirham cash. Rajesh told Kurian David that the payments for Malvern C. Burnett and Michael Pol had to be made with cashier's checks in U.S. dollars. Kurian David went to Al Ansari Exchange, where he obtained the required cashier's checks. He returned to the Dewan consultants office and provided Rajesh with a check payable to Malvern C. Burnett in the amount of \$1,485.60; a check payable to Michael Pol in the amount of \$1,485.60; a cash payment to Sachin Dewan in the amount of 3,467 dirham; and a

				separate cash payment of 2,900 dirham for the additional H-2B fee, which Mr. Dewan had reduced from the original 5,000 dirham.
F 134	On or about August 3-4, 2006	Banking transaction (wires)	Representative of Dewan Consultants to bank	Deposit of 6,367 dirham paid by Kurian David on/about August 3, 2006.
F 135	On or about August 3-4, 2006	Banking transaction (wires)	Malvern C. Burnett to bank	Deposit of \$1,485.60 check paid by Kurian David on/about August 3, 2006.
F 136	On or about August 3-4, 2006	Banking transaction (wires)	Michael Pol to bank	Deposit of \$1,485.60 check paid by Kurian David on/about August 3, 2006.
F 137	On or about August 4, 2006, 3:00 p.m.	Call from 94472-59191 or 91-22-5694-1618 to 99472-59191 (wires)	Salimon on behalf of Dewan Consultants to Palanyandi Thangamani	Call to request delivery of the cashier's checks for Malvern C. Burnett and Michael Pol, and cash payment to Dewan Consultants, to the Park Hotel in Chennai on/about August 10, 2006.
F 138	On or about August 10, 2006	In-person at Park Hotel in Chennai, India	Salimon on behalf of Dewan Consultants and Palanyandi Thangamani	Meeting. Palanyandi Thangamani submitted cashier's checks in the amount of \$1,426.74 each to Malvern C. Burnett and Michael L. Pol.
F 139	On or about August 10, 2006	Meeting at Salimon's office	Sachin Dewan, Salimon, and Malvern C. Burnett to Sony Sulekha	Meeting to collect first installment payments was interrupted by police. Payments were returned. Workers were told to leave and await further instruction.
F 140	On or about August 11, 2006	Banking transaction (wires)	Malvern C. Burnett to bank	Deposit of \$1,426.74 cashier's check paid by Palanyandi Thangamani on/about August 13, 2006.
F 141	On or about August 11, 2006	Banking transaction (wires)	Michael L. Pol to bank	Deposit of \$1,426.74 cashier's check paid by Palanyandi Thangamani on/about August 13, 2006.
F 142	In or around August 2006 up to in or around early- to mid-October 2006	Multiple telephone calls by Andrews Issac Padavettiyil in Mumbai, India to Dewan Consultants' Mumbai,	Andrews Issac Padavettiyil to Sachin Dewan of Dewan Consultants	Sachin Dewan promised Andrews Issac Padavettiyil that the green card processing was going well and that Andrews Issac Padavettiyil's green card would be ready by October 2006.

		India offices (91-22-5694-1617) (wires)		
F 143	On or about August 18, 2006	Telephone from 971-505-505 or 971-4-391-2933 or 971-4-391-5504 to 971-2-312-9670 (wires)	“Rajesh” or other representative of Dewan Consultants to Kurian David	Call to inform Kurian David of meeting on/about August 21, 2006 with Malvern C. Burnett.
F 144	On or about August 19, 2006	Mails	Muruganantham Kandhasamy in Neyveli, India to Dewan Consultants in Mumbai, India	Letter from Muruganantham Kandhasamy informing Dewan Consultants that he had the initial installment ready. Muruganantham Kandhasamy enclosed a copy of the initial certified checks payable to Mr. Malvern C. Burnett and Mr. Michael L. Pol.
F 145	On or about August 21, 2006	In-person at Dewan Consultants office in Dubai, UAE	Malvern C. Burnett, Sachin Dewan, Manish Dewan, Sachin Dewan’s cousin, Kurian David, and other prospective Signal worker candidates	Malvern C. Burnett provided a receipt for the August 3, 2006 (on/about) check from Kurian David. Malvern Burnett told the workers that Signal had applied for H-2B visas, which he said would be ready shortly, and that by the end of 30 months, green cards would be approved.
F 146	On or about August 21, 2006	Call from Murugan. Kandhasamy’s cell phone to 91-22-5694-1618	Muruganantham Kandhasamy in Neyveli, India to Dewan Consultants in Mumbai, India	Call to confirm that the Dewan Consultants office in Mumbai had received the copies of the initial certified checks. The representative of Dewan Consultants indicated that the copies of the checks had arrived, and that Muruganantham Kandhasamy would have to wait for the next steps.
F 147	On or about August 21 or 22, 2006	Telephone from 944-72-59191 to Sony Sulekha	Salimon, on behalf of Dewan Consultants, to Sony Sulekha	Salimon directed Sony Sulekha to bring the first installment payment to his office in Kottayam (Arvind Associates office) on August 24, 2006.
F 148	On or about August 24, 2006	Meeting in Kottayam, India	Salimon, Sachin Dewan, Malvern C. Burnett, and	Meeting to collect first installment payments. Sony Sulekha directly gave dollar drafts to

			Sony Sulekha	<p>Malvern Burnett and Salimon (for Michael Pol) and paid Sachin Dewan approximately 13,500 rupees in cash. Mr. Burnett signed and gave Mr. Sulekha receipts for the payment.</p> <p>Burnett printed out a form on letterhead for Sony Sulekha to complete and sign. Sony Sulekha signed documents with headings of Malvern C. Burnett and Global Resources. Malvern C. Burnett also signed both of these documents.</p>
F 149	On or about August 24, 2006	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of the equivalent of balance of funds paid by Sony Sulekha on/about August 24, 2006.
F 150	On or about August 24, 2006	Banking transaction (wires)	Malvern C. Burnett to bank	Deposit of cashier's check paid by Sony Sulekha on/about August 24, 2006.
F 151	On or about August 24, 2006	Banking transaction (wires)	Michael L. Pol to bank	Deposit of cashier's check paid by Sony Sulekha on/about August 24, 2006.
F 152	On August 24, 2006	Electronic mail (wires)	Michael Pol, John Sanders	Michael Pol sends email to John Sanders advising him that the U.S. embassy/consular staff cannot be advised that the foreign labor work would extend beyond 10 months, stating, "[o]ne of us, (Mal, Sachin, or I) needs to be with each and every candidate going into the consulate before their interview. They sometimes say the dumbest things and need to be coached on the proper way to interview. They also need to have the proper documents with them and more importantly there are some things that should not be known to the consulate personnel, such as the fact that we are going to process

				them for a green card. If one of the guys says he's going to the U.S. for immigration and Signal is sponsoring him for permanent residence . . . he's a goner.”
F 153	On or about August 28, 2006 through in or around late-October 2006	Call from Murugan. Kandhasamy’s cell phone to 91-22-5694-1618	Muruganantham Kandhasamy in Neyveli, India to Dewan Consultants in Mumbai, India	Weekly calls to determine when to deliver initial installment payment. Sometime in August 2006, a representative of Dewan Consultants told Muruganantham Kandhasamy to deliver the payments to Salimon at the Park Hotel in Chennai, India on/about November 1, 2006.
F 154	In or around late Summer/Fall 2006	Newspaper Advertisement	Thanasekar Chellappan	Thanasekar Chellappan sees an advertisement in two newspapers about employment opportunities at Signal. Advertisement includes the following statement: “LARGE SHIPYARD IN THE USA REQUIRES ON [SIC] H2B & EMPLOYMENT BASED GREEN CARD VISAS ... SALARY 14-18 USD PER HOUR, ACCOMMODATION, TRANSPORTATION, FOOD PROVIDED ON SALARY DEDUCTION BASIS ...”

F 155	In or around late Summer/Fall 2006	Phone call	Thanasekar Chellappan, Rajesh Kumar, Thanasekar Chellappan's brother, and an employee of Dewan Consultants.	Thanasekar Chellappan contacted Dewan Consultants with help from his brother, Rajesh Kumar, who speaks Hindi. An employee of Dewan Consultants asked Thanasekar Chellappan to come for in-person interview.
F 156	In or around late Summer/Fall 2006	Conversation	Kuldeep Singh and a friend, Rampal Singh (no relation)	Kuldeep Singh found out about employment opportunity at Signal through a friend who had seen an advertisement in the newspaper.

F 157	In or around late Summer/Fall 2006	Phone call (wires) within India	Kuldeep Singh and a staff person at Dewan Consultants (Mumbai Office)	Kuldeep Singh makes phone call to Mumbai office of Dewan Consultants in response to the information in the newspaper ad. He was informed that he should go to the Delhi office for more information about the employment opportunity and that he should meet with the manager of the office, named Shivram.
F 158	On or about August 31, and September 1 and 2, 2006	by mail, electronic transmission, and/or fax	The United States Citizenship and Immigration Service, Signal, Malvern C. Burnett	The United States Citizenship and Immigration Service sent approval notices to Signal and Malvern C. Burnett for Signal's H-2B visa petitions for 590 H-2B workers for the period of October 1, 2006 through July 31, 2007.
F 159	On or about September 1 and 2, 2006	Electronic mail (wires)	Malvern Burnett, Michael Pol, and Sachin Dewan	Malvern Burnett sends emails to Michael Pol and Sachin Dewan forwarding USCIS's notice of H-2B Visa approvals, indicating Defendants would financially gain from them.
F 160	On or about September 2006	Electronic mail (wires)	Dewan Associates in Dubai, UAE, Mumbai, India, or New Orleans, Louisiana to <u>Times of India</u> newspaper in New Delhi, India	Transmission of advertisement indicating green card and permanent employment opportunities in the United States for welders and pipe fitters.

F 161	On or about September 16 2006	Electronic mail (wires)	Malvern Burnett, John Sanders	Malvern Burnett sends email to John Sanders stating that the U.S. embassy/consular staff cannot be advised that the foreign labor work would extend beyond 10 months.
F 162	On or about September 2006	In-person, possibly on flight to India	Bill Bingle (Signal V.P.), Malvern Burnett	Malvern Burnett tells Bill Bingle to not tell the U.S. Consulate that the work for the foreign labor was going to exceed ten months.
F 163	On or about September 16,2006	Telephone call from 944-72-59191 to Sony Sulekha	Salimon, on behalf of Dewan Consultants to Sony Sulekha	Salimon directed Sony Sulekha to go to HDFC bank in Ernakulam and pay the fee necessary to receive an interview with the United States Consulate.
F 164	On or about September 18, 2006	Banking transaction (wires)	Sony Sulekha to HDFC bank, Moncy (LNU) on behalf of Dewan Consultants	Sony Sulekha paid the 4,800 fee plus 281 rupees to receive a consular interview. Moncy, on behalf of Dewan Consultants, assisted Sony Sulekha in completing the paperwork. Moncy said that Salimon would call Sony Sulekha to communicate the exact date of the U.S. consular interview.
F 165	On or about September 18, 2006	Telephone call from 94472-59191 or 91-22-5694-1618 to 99472-59191 (wires)	Salimon on behalf of Dewan Consultants to Palanyandi Thangamani	Call to request delivery of the cashier's checks for Malvern C. Burnett and Michael Pol, and cash payment to Dewan Consultants, to the Park Hotel in Chennai on/about September 25, 2006.
F 166	On or about September 20, 2006	Telephone call from 971-505-505 or 971-4-391-2933 or 971-4-391-5504 to 971-2-312-9670 (wires)	"Rajesh" or other representative of Dewan Consultants to Kurian David	Call to inform Kurian David of September 7, 2006 (on/about) appointment to provide money for visa fee and complete visa application forms. Kurian David was required to list Dewan's office as the return address for the application.
F 167	On or about	In-person in Dubai, UAE	Representative of Dewan	Meeting to collect cash for visa fee and to

	September 25, 2006		Consultants and Kurian David	complete visa application forms.
F 168	On or about September 25, 2006	In-person at Park Hotel in Chennai, India	Salimon on behalf of Dewan Consultants, upon information and belief Malvern C. Burnett, and Palanyandi Thangamani	Meeting. Palanyandi Thangamani submitted cashier's checks in the amount of \$2,442.00 each to Malvern C. Burnett and Michael L. Pol. Palanyandi Thangamani separately sent Dewan Consultants in Mumbai a 5,000 rupees check for the U.S. consulate interview fee. Sachin Dewan told Palanyandi Thangamani that Signal was a good company, would pay him well and provide food and lodging for free, and would process his green card.
F 169	On or about September 29, 2006	Telephone call from 971-505-505 or 971-4-391-2933 or 971-4-391-5504 to 971-2-312-9670 (wires)	"Rajesh" or other representative of Dewan Consultants to Kurian David	Call to inform Kurian David of October 3, 2006 (on/about) meeting to prepare prospective Signal employees for U.S. consulate visa interviews.
F 170	In or around September and/or October 2006	Mails, or telephone, fax, and/or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Dubai, UAE; and/or Mumbai, India	Between Sachin Dewan, Dewan Consultants, Michael Pol, Global Resources, Malvern Burnett, Burnett Law Offices, GCILC, Kurella Rao, Indo-Amerisoft, LLC, and Signal International	Discussions and transmission of materials related to transferring Indo-Amerisoft-sponsored green card applicants to Signal as sponsor; discussion of offering H-2B visas sponsored by Signal to green card applicants. Discussions and transmission of materials related to testing, H-2B processing and arrival of Indian H-2B workers at Signal International operations in the United States. Specific information regarding these communications is largely in the sole possession of Defendants.

F 171	In or around September to November 2006	Telephone calls from Sony Sulekha to 944-72-59191	Sony Sulekha to Salimon, on behalf of Dewan Consultants	Sony Sulekha called Salimon several times a week for updates regarding the processing of his application. Salimon informed Sony Sulekha that there were long delays in scheduling U.S. consular interviews.
F 172	In or around October 2006	In-person, Haryana, India	Krishan Kumar and friend	Krishan Kumar's friend told him about a person, Shivram in New Delhi, who could get him work in the U.S.
F 173	In or around October 2006	Telephone	Sabulal Vijayan's wife, Salimon on behalf of Dewan Consultants	Salimon called Sabulal Vijayan's wife and said, "We are sending people to America. Tell Sabulal to contact me immediately."
F 174	In or around October 2006	Telephone, from Dubai, UAE to Salimon's office, Kolchi, India	Sabulal Vijayan, Salimon on behalf of Dewan Consultants	Sabulal Vijayan called Salimon, and Salimon said that Signal was recruiting employees. He said Sabulal Vijayan could go to the U.S. through an H-2B visa, which would lead to permanent residency status. Salimon said that Signal would provide him with extensions and permanent residency status. Salimon told Sabulal Vijayan to go to India on November 4, 2006 for an interview. He told Sabulal Vijayan to bring two drafts: 1) 5,000 rupees, and 2) 1,600-2,000 rupees for the U.S. Embassy in India. Salimon said, "A

				<p>blood relation can take the draft.” Salimon said that the visa would be an employment-based visa that would lead to permanent residency status. Salimon said that the green card petition via Rao/IAS was delayed.</p>
F 175	In or around Fall 2006	In-person, Dewan office, Dubai office, UAE	Sabulal Vijayan, Varuna Dewan on behalf of Dewan Consultants	<p>Varuna Dewan told Sabulal Vijayan that it was a good chance to go to the U.S. and that Signal was a good shipyard in the U.S. Varuna Dewan said that this was the way to get permanent residency status. Varuna Dewan said that the H-2B visa will lead to a green card. Varuna Dewan said, “You’re going directly to the company, no subcontractor.” Varuna Dewan said that the green card would take time and that this visa was the way to get to the U.S. and then get the green card. Varuna Dewan said that her family has been doing these kinds of visas since 1996.</p> <p>Sabulal Vijayan also received a card showing three or four Signal locations and other information, including a website. Varuna Dewan said, “Signal can provide you with a visa. And after three extensions, you can get the green card status.” Varuna Dewan said that Sabulal Vijayan needed to pay an additional 35,000 rupees to Sachin Dewan for the H-2B visa on top of the five lakh rupees already discussed. Varuna Dewan said that Signal would provide</p>

				accommodations, food, and transportation. Varuna Dewan said, "The company will deduct amounts for accommodation, transport, and food from your paychecks."
F 176	On or about October 2, 2006	Call from public telephone in Delhi, India, to 5694-1617	Hemant Khuttan to representative of Dewan Consultants	Hemant Khuttan called Dewan Consultants to inquire about the posted advertisement in the Hindustan Times for work in the United States. The representative of Dewan Consultants told Hemant Khuttan that the advertisement was valid and that he would have to go to Dewan Consultants' office in Mumbai, India to learn about the details.
F 177	On or about October 3, 2006	In-person in Dubai, UAE	Sachin Dewan and Malvern C. Burnett to Kurian David and other prospective Signal employees	Meeting to prepare prospective Signal employees for U.S. consulate visa interviews. Sachin Dewan and Malvern Burnett gave the workers instructions about how to answer consular officers' questions, including: <ul style="list-style-type: none"> • The prospective Signal employees should say that they only paid a minimal recruitment fee of 330 dirhams. • The prospective Signal employees should tell the consular officers that they would return to India before July 31, 2007, even though Sachin Dewan and Malvern Burnett promised the prospective Signal employees the visas would be extended twice beyond July 31, 2007, and that the prospective Signal employees would get green cards. • The prospective Signal employees should

				<p>say that they are only coming to the United States on H-2B visas. They should not mention any application for a green card.</p> <ul style="list-style-type: none"> • The prospective Signal employees should say that they want to return to India because of their families and their economic ties to India. <p>Sachin Dewan and Malvern Burnett told the prospective Signal employees that they would not get a green card if they did not answer the questions as per their instructions. Sachin Dewan said that if he and Malvern Burnett had the power to get their visas stamped, they had the power to get their visas cancelled.</p> <p>Kurian David also received an offer of employment letter.</p>
F 178	On or about October 4, 2006	In-person at U.S. Consulate in Dubai, UAE	U.S. consular officers and Kurian David	Collected passports and conducted visa interviews. Kurian David's passport was not returned until he went back to India on/about November 19, 2006.
F 179	On or about October 5, 2006	In-Person Interview at the D'Silva Works, a welding company in Tiruvottiyur, India	Thanasekar Chellappan, Sachin Dewan, and three representatives from Signal, as well as Salimon, an employee of Dewan Consultants.	Thanasekar Chellappan is interviewed by Sachin Dewan and three representatives of Signal. Salimon, an employee of Dewan Consultants helps process papers of the potential employees outside of the interview area. After the interview, Sachin Dewan informed Thanasekar Chellappan that he passed the interview.
F 180	On or about October 5, 2006	Letter (dated October 6, 2006)	William D. Bingle, Jr., Vice President of Production at Signal International, LLC and Thanasekar Chellappan.	"Offer of Employment" letter addressed to Thanasekar Chellappan by William D. Bingle given in-person to Thanasekar Chellappan at the end of the interview.

				Letter states that salary will be \$18.00 per hour for 40 hours per week and that overtime would be paid at \$27.00 per hour. Letter also states that Signal will provide a return airline ticket upon expiration of the H-2B visa.
F 181	In or around first or second week of October 2006	Phone call from Varuna Dewan in Dewan Consultants' d/b/a Medtech Consulting's offices in Dubai, UAE (971-4-391-2933) to Kechuru Dhananjaya in Dubai, UAE	Varuna Dewan, Dewan Consultants, to Kechuru Dhananjaya	Varuna Dewan called Kechuru Dhananjaya to instruct him to appear for a meeting with Sachin Dewan at Dewan Consultants' Dubai office.
F 182	In or around Mid-October 2006	Telephone call by Andrews Issac Padavettiyil in Mumbai, India to Dewan Consultants' d/b/a Medtech Consulting's Mumbai, India offices (91-22-5694-1617) (wires)	Andrews Issac Padavettiyil to Sachin Dewan of Dewan Consultants	Sachin Dewan stated that Andrews Issac Padavettiyil could go to the United States "immediately" and that Andrews Issac Padavettiyil should come to a meeting at Dewan Consultants' offices in Mumbai.
F 183	In or around second week of October 2006	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's offices in Dubai, UAE	Sachin Dewan, Manesh Dewan, Varuna Dewan, Dewan Consultants, Kechuru Dhananjaya, Andrews Issac Padavettiyil, and other workers	Sachin Dewan informed workers of an opportunity to transfer their pending green card applications to the sponsorship of Signal International and obtain an immediate ten month H-2B visa to enable them to work for Signal while their green cards were finalized. Sachin Dewan stated that Signal would extend the H-2B visa twice for ten months each time and process the applicants' green cards. Sachin Dewan told the workers that the green cards were delayed but that the

				workers would receive them. Sachin Dewan further stated that green card applicants would have to pay extra to Michael Pol, Malvern Burnett and Sachin Dewan for the H-2B opportunity with Signal.
F 184	In or around late October 2006 or early November 2006	In-person, New Delhi, India	Krishan Kumar, Shivram on behalf of Dewan Consultants	<p>Shivram told Krishan Kumar about how he could work in the U.S. and obtain permanent residency for himself and his family. Shivram told him that the company would train him and that the position would be permanent. Shivram told him he would have to pay 11.5 lakh rupees as fees.</p> <p>Shivram told Krishan Kumar to say at his embassy interview that he learned about this position by reading about it in a newspaper and not to reveal that he went through an agent.</p>
F 185	On or about October 16 and 23, 2006	Telephone from 971-505-505 or 971-4-391-2933 or 971-4-391-5504 to 971-2-312-9670 (wires)	Kurian David to "Rajesh" or other representative of Dewan Consultants	<p>Call from Kurian David to request passport to return to India for Kurian David's father-in-law's funeral (October 16), and later to attend his niece's wedding (October 23). The representative of Dewan Consultants said they did not have the passports; that Kurian David would have to keep waiting and could not leave the UAE.</p>
F 186	On or about October 16, 2006	In-person at Dewan Consultants office in Mumbai, India	Representative of Dewan Consultants and Hemant Khuttan	<p>A representative of Dewan Consultants told Hemant Khuttan that he would be working for Signal, that he would get a green card, and that he would be able to bring his family to the U.S. within one year, but he would have to pay 8 lakh rupees for it. Hemant Khuttan told the representative of Dewan</p>

				Consultants that he could get the necessary money, but wanted to know more about the process involved in securing the work opportunity and green card. Hemant Khuttan was also given the internet address for Signal's website with the suggestion that Hemant Khuttan look at the website to assess whether the company was legitimate.
F 187	On or about October 16, 2006	Signal International computer server to Internet café in Mumbai, India	Signal International to Hemant Khuttan	Transmission of Signal International website.
F 188	On or about October 19, 2006	Call from Hemant Khuttan's mobile phone to 5694-1617 (wires)	Hemant Khuttan to representative of Dewan Consultants.	Call from Hemant Khuttan to inform Dewan Consultants that he was interested in pursuing the work opportunity in the United States. The representative of Dewan Consultants told Hemant Khuttan that he would have to bring 300,000 rupees to the Dewan Consultants office in Delhi, India.
F 189	In or around October 2006	Mails, or telephone, fax, and/or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Dubai, UAE; and/or Mumbai, India	Sachin Dewan, Dewan Consultants, Michael Pol, Global Resources, Malvern Burnett, Burnett Law Offices, GCILC, Kurella Rao, Indo-Amerisoft, LLC, Signal International	Discussions and transmission of materials related to coordinating tests and recruitment of Indian workers in India and Dubai to work at Signal International, including recruitment materials and hiring letters from Signal International. Specific information regarding these communications is largely in the sole possession of Defendants.
F 190	On or about October 23, 2006	In-person at Dewan Consultants office in Mumbai, India	Representative of Dewan Consultants to Hemant Khuttan	Meeting. Hemant Khuttan gave the representative of Dewan Consultants a cash payment of 300,000 rupees. Hemant Khuttan asked how long it would take before he could go to the United States. The representative of Dewan Consultants told

				him he would apply for the visa and then call with an update. The representative of Dewan Consultants also told Hemant Khuttan that he would have to follow Sachin. Dewan's instructions if he wanted to get a green card; that Signal would provide housing, food, tools, and everything else needed for the work in the United States; and that he would earn an hourly wage of \$18.00, and \$27.00 for overtime. Hemant Khuttan completed a biographical information form and other documents.
F 191	On or about October 24, 2006	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of 300,000 rupees paid to Dewan Consultants by Hemant Khuttan on/about October 23, 2006.
F 192	On or about October 24, 2006	In-person payment at Dewan Consultants, Mumbai office.	Thanasekar Chellappan and Sachin Dewan	Thanasekar Chellapan makes initial payment of 40,000 rupees to Sachin Dewan, Dewan Consultants.
F 193	On or about late October 2006.	Banking transactions in United States, India, and/or Dubai, UAE	Sachin Dewan, Dewan Consultants Michael Pol, Global Resources, Malvern Burnett, Burnett Offices, GCILC	Deposit of funds collected from Thenasekar Challapan on or about October 24, 2006.
F 194	On or about October 26, 2006	Call from Hemant Khuttan's mobile phone to 5694-1617 (wires)	Hemant Khuttan to representative of Dewan Consultants.	Call from Hemant Khuttan to Dewan Consultants requesting update. Representative of Dewan Consultants told Hemant Khuttan that he would have to travel to Kochi, India on/about November 6, 2006 for a skills test.
F 195	In or around Fall 2006	India	Krishan Kumar, Signal representative	Signal representative interviewed, tested, and hired Krishan Kumar for employment in the U.S.
F 196	In or around Fall	Mails, or telephone, fax,	Malvern C. Burnett, Burnett	Discussions and transmission of materials

	2006	or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Mumbai, India; and/or Dubai, UAE	Law Offices, GCILC, Michael Pol, Global Resources, Signal International, Sachin Dewan, and Dewan Consultants	related to H-2B visa extensions and green cards for Indian H-2B workers at Signal and preparations testing of workers in India. Specific information regarding these communications is largely in the sole possession of Defendants.
F 197	In or around Fall 2006	In-person meeting at office of Dewan Consultants in Delhi	Kuldeep Singh, two of his friends, and Shivram, an employee of Dewan Consultants office in Delhi.	Kuldeep Singh and two of his friends, Rampal Singh and another acquaintance, met with Shivram, who gave them more details about the employment opportunities available at Signal.
F 198	In or around late Fall 2006	Phone Call	Kuldeep Singh and an employee of Dewan Consultants office in Delhi.	Kuldeep Singh was called to participate in a second meeting with Shivram at the Delhi office of Dewan Consultants.
F 199	In or around late Fall 2006, approximately October 2006	In-person meeting at office of Dewan Consultants in Delhi	Kuldeep Singh and Shivram, an employee of Dewan Consultants office in Delhi.	Shivram told Kuldeep Singh to go to Mumbai for an interview about a week and a half after this meeting.
F 200	In or around late Fall 2006, either October or November	In-person interview in Mumbai, India	Sachin Dewan, a staff person of Sachin Dewan/Dewan Consultants (described himself as the right hand man of Sachin) and a Caucasian man, and a group of 8-10 prospective Signal employees (including Kuldeep Singh).	Sachin Dewan told Kuldeep Singh and other potential employees that they would receive visas, visa extensions, and green cards to work at Signal in exchange for payment of 8 lakh rupees in three installments. Were also told by Sachin Dewan that they would have to go to the Embassy for an interview. All prospective Signal employees were told that Signal would pay them approximately \$18.50 per hour. Sachin Dewan informed Kuldeep Singh and other workers that they would be called about the date of the consular interview
F 201	In or around late Fall 2006, either	In-person delivery of payment to Dewan	Shivram, an employee of Dewan Consultants office,	Kuldeep Singh made a first installment payment in cash to Shivram at the Delhi

	October or November	Consultants in Delhi	and Kuldeep Singh	office of Dewan Consultants.
F 202	In or around late Fall 2006	Banking transactions in United States, India, and/or Dubai, UAE	Sachin Dewan, Dewan Consultants Michael Pol, Global Resources, Malvern Burnett, Burnett Offices, GCILC	Deposit of funds collected from Kuldeep Singh as first installment fees.
F 203	In or around late Fall 2006	Phone Call	Employee of Dewan Consultants and Kuldeep Singh	A Dewan Consultants employee calls Kuldeep Singh instructing him to go to the Delhi Office of Dewan Consultants to pick up paperwork, including a letter to take to the Embassy for the consular interview on December 12.
F 204	On or around October 28, 2006	In-person meeting in Dewan Consultants' Mumbai, India offices	Sachin Dewan, Dewan Consultants, Andrews Issac Padavettiyil, and other prospective Signal employees.	Sachin Dewan informed the workers they would get an H-2B visa with Signal and Signal would take care of the green card. Sachin Dewan said that the J & M Associates process would take a long time, so workers should opt for Signal's sponsorship instead. Andrews Issac Padavettiyil paid a third installment payment of \$1,435 on Canara Bank draft made out to Michael Pol and \$1,435 Canara Bank draft made out to Malvern Burnett. Andrews Issac Padavettiyil paid the equivalent of \$1,435 in rupees plus 33,000 rupees to Sachin Dewan in cash.
F 205	On or about late October 2006	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of the equivalent of \$1,435 in rupees plus 33,000 rupees to Sachin Dewan in cash paid by Andrews Issac Padavettiyil on/about October 28, 2006.
F 206	On or about late October 2006	Banking transaction (wires)	Malvern C. Burnett to bank	Deposit of \$1,435 cashier's check paid by Andrews Issac Padavettiyil on/about October 28, 2006.

F 207	On or about late October 2006	Banking transaction (wires)	Michael L. Pol to bank	Deposit of \$1,435 cashier's check paid by Andrews Issac Padavettiyil on/about October 28, 2006.
F 208	In or around last week of October or early November 2006	Phone call from Varuna Dewan in Dewan Consultants offices in Dubai, UAE (971-4-391-2933) to Kechuru Dhananjaya in Dubai, UAE	Varuna Dewan, Dewan Consultants, to Kechuru Dhananjaya	Varuna Dewan called Kechuru Dhananjaya to instruct him go to a skills test at Al Mullah Marine Engineering Works in Dubai, UAE on approximately November 5, 2006.
F 209	In or around October or November 2006	Mails	From U.S. Consulate in Dubai, UAE to Dewan Consultants in Dubai, UAE	Mailing of Kurian David's passport.
F 210	In or around late October to mid-November 2006	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, Signal International, Sachin Dewan, and Dewan Consultants	Discussions and transmission of materials related to H-2B visa extensions and green cards for Indian H-2B workers at Signal and preparations for November 2006 meeting at Signal labor camp in Pascagoula, MS. Specific information regarding these communications is largely in the sole possession of Defendants.
F 211	On or about October 28, 2006	Telephone calls from 944-72-59191 to Sony Sulekha	Salimon, on behalf of Dewan Consultants, to Sony Sulekha	Salimon called Sony Sulekha to inform him that the interview date with the U.S. Consulate was set for November 3, 2006 at 1 p.m. He told Sony Sulekha to arrive in Chennai at 10 a.m. to receive training and preparation for the interview.
F 212	On or about October 30, 2006	In person, at airport in Mobile, Alabama	Andrews Issac Padavettiyil and other Indian migrant workers who had flown in with him from India, Michael Pol, Malvern C. Burnett and Burnett Law	Malvern C. Burnett and Michael Pol met Andrews Issac Padavettiyil and the other Indian migrant workers at the airport in Mobile, Alabama.

			Offices	
F 213	On or about November 1, 2006	In-person at Park Hotel in Chennai, India	Malvern C. Burnett, Michael Pol, Sachin Dewan, Saliman, John Sanders on behalf of Signal International, and Muruganantham Kandhasamy	Meeting. Muruganantham Kandhasamy delivered a 66,000 rupees cash to Sachin Dewan. Muruganantham Kandhasamy had sent a cashier's check payable to Michael Pol in the amount of \$1,426.00 and a cashier's check payable to Malvern C. Burnett in the amount of \$1,426.00 to Sachin Dewan's Mumbai office a few days earlier. Sachin Dewan and Salimon told him that his interview with the U.S. consulate had been scheduled for sometime the first week of November 2006. They also provided Muruganantham Kandhasamy with additional documents, and told him how to prepare the documents.
F 214	On or about November 1, 2006	Call from 94472-59191 or 91-22-5694-1618 to 99472-59191 (wires)	Salimon on behalf of Dewan Consultants to Palanyandi Thangamani	Call to schedule U.S. consulate interview and a pre-interview preparation meeting with Sachin Dewan. Salimon told Palanyandi Thangamani to bring his passport and other materials, including certificates of assets and property and his marriage certificate.
F 215	On or about November 3, 2006	Meeting at Park Hotel in Chennai, India	Salimon, Sachin Dewan, Malvern C. Burnett, and Sony Sulekha	Meeting to prepare prospective Signal employees for U.S. consulate visa interviews. Sachin Dewan and Malvern Burnett gave the workers instructions about how to answer consular officers' questions, including: <ul style="list-style-type: none"> • The prospective Signal employees should say that they only paid a minimal recruitment fee (several hundred dollars). • The prospective Signal employees should tell the consular officers that they would

				<p>return to India before July 31, 2007, even though Sachin Dewan and Malvern Burnett promised the workers the visas would be extended twice beyond July 31, 2007, and that the workers would get green cards.</p> <ul style="list-style-type: none"> • The prospective Signal employees should say that they are only coming to the United States on H-2B visas. They should not mention any application for a green card. • The prospective Signal employees should say that they want to return to India because of their families and their economic ties to India. <p>Malvern Burnett also told Sony Sulekha and other prospective Signal employees that all of the people who had their interviews that day were fine and that he would pick up the passports from the consulate the following day and send them to Sachin Dewan's office in Mumbai and that Sony Sulekha and the others would get their passports from there. Sachin Dewan and Malvern Burnett told the prospective Signal employees that failure to answer these questions as instructed would jeopardize their chance to get a green card as well as the chance of all other applicants. After the instructions, the workers were given their documents, the certificates, receipt for the consulate interview time, and the check for the consulate, and sent us to the consulate.</p>
F 216	In or around early November 2006	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of 66,000 rupees paid by Muruganantham Kandhasamy on/about

				November 1, 2006.
F 217	In or around early November 2006	Banking transaction (wires)	Malvern C. Burnett to bank	Deposit of \$1,426.74 cashier's check paid by Muruganantham Kandhasamy on/about November 1, 2006.
F 218	In or around early November 2006	Banking transaction (wires)	Michael L. Pol to bank	Deposit of \$1,426.74 cashier's check paid by Muruganantham Kandhasamy on/about November 1, 2006.
F 219	On or about November 4, 2006 for about eight hours	In-person, Chennai, India	Sabulal Vijayan, Sachin Dewan, Manish Dewan, Salimon, the secretary of Dewan and Salimon, Michael Pol, Signal representative W.A. Shouse, a Signal representative who appeared Latino, about 100 other prospective Signal employees, including some new candidates	<p>Sabulal Vijayan went to Chennai for a workshop. Sabulal Vijayan and the other prospective Signal employees got tested. The man who looked Latino reviewed Sabulal Vijayan's experience certificates and then administered the written pipefitting test to Vijayan. Before he completed the test, the man who looked Latino told Sabulal Vijayan that he passed and instructed him to talk to Sachin Dewan. Sachin Dewan told Sabulal Vijayan to come to his office. Sabulal Vijayan asked Sachin Dewan about the permanent visa and Sachin Dewan said that the visa was delayed for more than six months. Sabulal Vijayan responded that he was interested in the visa because it enabled him to bring his family to the U.S. and Sachin Dewan responded by saying that Sabulal Vijayan could go on a "temporary visa" now and then get two extensions and eventually a permanent status.</p> <p>Signal representative W.A. Shouse interviewed, tested, and hired Sabulal Vijayan to work for Signal in the Gulf Coast.</p>

				W.A. Shouse oversaw the written structural fitters test.
F 220	On or about the night of November 4, 2006 for about three hours	In-person, Sachin Dewan's temporary office at the Park Hotel near the U.S. Consulate, Chennai, India	Sabulal Vijayan, Salimon, Sachin Dewan, Manish Dewan, a man that was possibly John Sanders (25 to 30 years old, lean, dark brown hair, and 5'6" to 6' tall), and perhaps Michael Pol	<p>Salimon had Sabulal Vijayan fill out online applications for his interview with the U.S. Consulate.</p> <p>Sachin Dewan told Sabulal Vijayan and the other applicant workers to tell the U.S. embassy that they each paid only 33,500 Indian rupees and that it was the processing fee for the visa. Sachin Dewan also said that if the workers told the embassy more than that amount, the interview process will stop and the visa process will be cancelled. Sachin Dewan also said that the workers should tell the embassy that the visa will only go until July 31. Sachin Dewan said Signal was a good company, would give extensions and a job in the Gulf Coast, and the workers would get permanent status. Sachin Dewan said Malvern Burnett and his team were working on these applications.</p> <p>Michael Pol spoke with Sachin Dewan in the hotel hallway. The man that may have been John Sanders ate and drank with Manish Dewan and other Americans.</p>
F 221	On or about November 5, 2006	In-person, Sachin Dewan's temporary office at the Park Hotel near the U.S. Consulate, Chennai, India	Sabulal Vijayan, Sachin Dewan, Salimon, Rajesh (from Dewan's Mumbai office)	Sabulal Vijayan saw an H-2B letter statement from Signal that promised \$18/hour. Sabulal Vijayan signed this paper. Sachin Dewan made copies of Sabulal Vijayan's original experience certificates, birth certificate, documents for his property,

				and receipts for payments. These documents were compiled for a file for Sabulal Vijayan to take with him to the U.S. Consulate. Sachin Dewan told him that when the embassy asked how much he had paid that Sabulal Vijayan was to say that he had paid only 33,500 Indian rupees and that this was the processing fee for this visa. Sachin Dewan also said that if Sabulal Vijayan told the embassy about a figure greater than that, that the interview process would stop and the visa process would be cancelled
F 222	On or about November 5, 2006	In-person, U.S. Consulate, Chennai, India	Sabulal Vijayan	Sabulal Vijayan went to the U.S. Consulate for his interview
F 223	On or about November 5, 2006	In-person, Sachin Dewan's temporary office at the Park Hotel near the U.S. Consulate, Chennai, India	Sabulal Vijayan, Sachin Dewan, Salimon	Sabulal Vijayan tells Sachin Dewan and Salimon that he passed his interview. Sachin Dewan and Salimon said that Sabulal Vijayan had to pay the third installment to Sachin Dewan's Mumbai office or to Salimon plus 35,000 rupees for the H-2B visa.
F 224	On or about November 6, 2006	In-person at engineering firm in Kochi, India	Representative of Dewan Consultants, superintendent of welding from Signal International, and Hemant Khuttan	Hemant Khuttan was given a welding test by the representative of Signal International.
F 225	In or around early November 2006	In-person meeting at Dewan Consultants d/b/a Medtech Consulting's offices in Dubai, UAE	Dewan Consultants and Kechuru Dhananjaya	Kechuru Dhananjaya received Signal materials with information about Signal's operations.
F 226	On or about November 5,	In-person meeting at Dewan Consultants d/b/a	Varuna Dewan, Dewan Consultants, and Kechuru	Varuna Dewan handed Kechuru Dhananjaya a letter from William Bingle dated October

	2006	Medtech Consulting's offices in Dubai, UAE	Dhananjaya	5, 2006 stating that he had been hired by Signal International.
F 227	In or around early November 2006	Telephone call from Varuna Dewan in Dewan Consultants d/b/a Medtech Consulting's offices in Dubai, UAE (971-4-391-2933) to Kechuru Dhananjaya in Dubai, UAE	Varuna Dewan Dewan Consultants to Kechuru Dhananjaya	Varuna Dewan informed Kechuru Dhananjaya that he would have to pay an additional 2,900 dirhams for the H-2B visa with Signal International and would also have to pay an outstanding balance of 1,000 dirhams.
F 228	In or around beginning of November 2006	Telephone from Sony Sulekha to 0481-250-7977	Sony Sulekha to Salimon, on behalf of Dewan Consultants	Multiple calls from Sony Sulekha to Salimon requesting a copy of the visa because it was necessary to obtain additional loans to pay recruitment fees. Salimon responded that the Dewan Consultants Mumbai office was holding the passports.
F 229	On or about November 6, 2006	In-person at Park Hotel in Chennai, India	Sachin Dewan and Salimon on behalf of Dewan Consultants, John Sanders on behalf of Signal International, Palanyandi Thangamani, Muruganantham Kandhasamy, and other prospective Signal employees	Preparation meeting for U.S. consulate interview. <ul style="list-style-type: none"> • Sachin Dewan advised Palanyandi Thangamani, Muruganantham Kandhasamy, and others to refrain from talking to anyone at the consulate other than the interviewer, to deny they had paid any recruitment fee, and to tell the consular officer that they would be returning to India before their visas expired. • Sachin Dewan told Muruganantham Kandhasamy that the H-2B visa turns into a green card "in a couple months." • Palanyandi Thangamani provided Sachin Dewan with the materials, including certificates of assets and property and his marriage certificate. Sachin Dewan put the

				<p>materials together in a packet and returned them to Palanyandi Thangamani so he could provide them to the U.S. consular officer.</p> <ul style="list-style-type: none"> • John Sanders from Signal spoke briefly with Muruganantham Kandhasamy, signed some papers, and put them in a folder that Salimon had previously given to Muruganantham Kandhasamy for his U.S. Consulate interview.
F 230	On or about November 6, 2006	In-person at U.S. Consulate in Chennai, India	U.S. consular officers, Palanyandi Thangamani, Muruganantham Kandhasamy, and other prospective Signal employees	Collected passports and conducted visa interviews. Palanyandi Thangamani's passport was not returned until he left for the United States on/about November 17, 2006. The U.S. Consulate rejected Muruganantham Kandhasamy's visa application because he had not brought his marriage certificate.
F 231	On or about November 6, 2006	In-person at Park Hotel in Chennai, India	Salimon on behalf of Dewan Consultants and Palanyandi Thangamani	Meeting. At Salimon's request, Palanyandi Thangamani returned to Salimon the packet containing his materials, including the certificates of assets and property and his marriage certificate. Salimon told Palanyandi Thangamani that he would let him know how to collect his passport later that evening.
F 232	On or about November 6, 2006	Call from 94472-59191 or 91-22-5694-1618 to 99472-59191 (wires)	Salimon on behalf of Dewan Consultants and Palanyandi Thangamani	Salimon informed Palanyandi Thangamani that Palanyandi Thangamani would not be able to collect his passport that evening, in spite of Salimon's earlier assurances. Salimon informed Palanyandi Thangamani that he would inform him later about how to collect his passport.
F 233	On or about November 7-9,	Telephone, call from Salimon to Sabulal	Sabulal Vijayan, Salimon	Salimon called Sabulal Vijayan to collect money for the plane ticket from Kochi to

	2006	Vijayan in Alapi, Kerala, India		Mumbai. Salimon told him to pay the balance to him in Kochi. Sabulal Vijayan said that he had paid money to Malvern Burnett and, "I don't have any more money to give you." Salimon said, "You need to talk to Sachin."
F 234	In or around early November 2006	Telephone or electronic mail, from Vijayan to Sachin Dewan	Sabulal Vijayan, Sachin Dewan	Sabulal Vijayan told Sachin Dewan that he didn't have any more money to give and that he had already paid \$4,500. Dewan said, "We can talk about this later."
F 235	On or about November 13, 2006	Telephone and fax	Dewan Consultants in Mumbai to Federal Ltd., Trivandrum Pallayam Branch	Because they were holding Sony Sulekha's passport and visa, Dewan Consultants sent a facsimile copy of his visa to Federal Bank Ltd., Trivandrum Pallayam Branch to support his application for loans to pay portions of the recruitment costs.
F 236	On or about November 13 or 14, 2006	Call from 94472-59191 or 91-22-5694-1618 to 99472-59191 (wires)	Salimon on behalf of Dewan Consultants to Palanyandi Thangamani	Salimon informed Palanyandi Thangamani that he could collect his passport from a courier's office.
F 237	On or about November 14, 2006	Telephone from 971-505-505 or 971-4-391-2933 or 971-4-391-5504 to 971-2-312-9670 (wires)	"Rajesh" on behalf of Dewan Consultants to Kuran David	Call to inform Kurian David that his visa processing was transferred to Chennai, India, that interviews were already taking place there, and that Kurian David's consular interview in Chennai would take place before the end of the month. Kurian David reminded Rajesh that he could not travel without his passport. Rajesh told Kurian David that his passport was at the Dewan Consultants office in Dubai. As a result, Kurian David had a friend retrieve the passport and took leave from his UAE employer and returned to India.
F 238	In or around	In-person, New Delhi,	Krishan Kumar, Shivram,	Krishan Kumar went to New Delhi to meet

	November 2006	India	Sachin Dewan	Shivram and sign a document and met Sachin Dewan there. Sachin Dewan held a letter pad with a contract from Signal. Sachin Dewan said that the contract said that Krishan Kumar would be paid \$18/hour and receive housing and food from Signal. Krishan Kumar signed the contract. Upon information and belief, these documents were transmitted between Sachin Dewan and Signal via the mail and/or wires.
F 239	In or around early Nov 2006	In-person meeting in Chennai, India	Sachin Dewan, Malvern C. Burnett, two Signal representatives including WA Shouse, Jacob Joseph Kadakkarappally and other prospective migrant workers	Sachin Dewan told workers that they would travel on H-2B visas to work for Signal and that the H-2B visas would be extended two times. In the meantime green card processing would be on-going.
F 240	On or about November 14, 2006	Mails	Sachin Dewan to Jacob Joseph Kadakkarappally	Sachin Dewan informs Jacob Joseph Kadakkarappally by letter that Signal "shall proceed with your Employment Based Permanent Residence Visa for United States of America." The letter also states the amounts of fees employees are required to pay in order to participate in the program.
F 241	On or about November 14-15, 2006	In-person at courier office in Chennai, India	Representative of Dewan Consultants and Palanyandi Thangamani	A Dewan Consultants representative accompanied Palanyandi Thangamani to the courier office to retrieve his passport. Palanyandi Thangamani signed for the passport and was required to give the passport to the Dewan Consultants representative, who told Palanyandi Thangamani he would get back the passport when he paid the money he owed to Dewan Consultants.

F 242	In or around early to mid-November 2006	In-person meeting at Signal labor camp in Pascagoula, Mississippi	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, Signal International, Andrews Issac Padavettiyil, and other Signal employees	Meeting with Malvern Burnett, Michael Pol, and Signal International representatives present. Malvern Burnett told Andrews Issac Padavettiyil as well as the other workers that they would be receiving two ten-month extensions on their H-2B visas (for a total of 30 months) and would get their green cards automatically thereafter.
F 243	On or about November 14, 2006	Telephone call from Salimon to Sony Sulekha to 0481-250-7977	Sony Sulekha to Salimon, on behalf of Dewan Consultants	Salimon instructed Sony Sulekha to bring the remaining recruitment costs to his office as follows: <ul style="list-style-type: none"> • Check to Malvern C. Burnett for \$2,442; • Check to Michael Pol for \$2,442; and • 2 lakh rupees cash to Sachin Dewan.
F 244	On or about November 15, 2006	Telephone call from Sony Sulekha to 0481-250-7977	Sony Sulekha to Salimon, on behalf of Dewan Consultants	Sony Sulekha called Salimon to confirm that he was ready to pay the final recruitment costs and the three payments had been arranged as instructed.
F 245	On or about November 15, 2006	Call from 94472-59191 or 91-22-5694-1618 to 99472-59191 (wires)	Salimon on behalf of Dewan Consultants to Palanyandi Thangamani	Call to inform Palanyandi Thangamani that his airline ticket to the United States was ready and could be picked up in Chennai in three days.
F 246	On or about November 15-16, 2006	Banking transaction (wires)	Representative of Dewan Consultants to Delta Airlines	Purchase of airline ticket: Chennai-Mumbai-New York (JFK)-Atlanta-Mobile, AL.
F 247	On or about November 17, 2006	In-person in Chennai, India	Salimon on behalf of Dewan Consultants and Palanyandi Thangamani	Meeting to check travel papers. Salimon told Palanyandi Thangamani that he would have to deliver the balance of the recruitment fee to Dewan Consultants in Mumbai, India. Salimon returned Palanyandi Thangamani's passport, but said that he would only receive his medical certificate and airline ticket from

				Mumbai to the United States after he paid his remaining balance. Salimon gave Palanyandi Thangamani his ticket for the Chennai-Mumbai flight.
F 248	On or about November 17, 2006	In-person in Mumbai, India	Representative of Dewan Consultants and Palanyandi Thangamani	Dewan Consultants representative collected 150,000 rupees from Palanyandi Thangamani, which was the remaining balance of his recruitment fee. A representative of Dewan Consultants handed Palanyandi Thangamani his medical certificate and his airline ticket for his flight to the United States.
F 249	On or about late November 2006	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of 150,000 rupees paid by Palanyandi Thangamani on/about November 17, 2006.
F 250	On or about November 17, 2006	Telephone call from 0481-250-7977 to Sony Sulekha	Salimon, on behalf of Dewan Consultants, to Sony Sulekha	Salimon called Sony Sulekha and directed him to meet at a lodge near the Nedumbassery airport on November 18 th in preparation for a November 19, 2006 departure. Salimon said that Sony Sulekha's passport was in the Dewan Consultant's Mumbai office and would be returned upon payment of final fees.
F 251	On or about November 18, 2006	Meeting in Kochi, India	Salimon, on behalf of Dewan Consultatns, and Sony Sulekha	Salimon gave Sony Sulekha his plane ticket to Mumbai.
F 252	On or about November 19, 2006	Meeting in Kochi, India	Sachin Dewan and Sony Sulekha	Sachin Dewan collected the final payment in the following amounts from Sony Sulekha. <ul style="list-style-type: none"> • Check to Malvern C. Burnett for \$2,442; • Check to Michael Pol for \$2,442; and • 2 lakh rupees cash to Sachin Dewan. Sachin Dewan required Sony Sulekha to

				sign paperwork. Sony Sulekha and Malvern Burnett signed an "Attorney Service Agreement," which stated Mr. Burnett will represent Mr. Sulekha and "file all necessary documents to assist the Worker make application [sic] for the permanent resident (green card) program." Sachin Dewan promised to try to expedite the green-card process so that Sony Sulekha and the other workers could bring their families quickly. He lauded Signal as an employer.
F 253	On or about November 19, 2006	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of 2 lakh rupees paid by Sony Sulekha on/about November 19, 2006.
F 254	On or about November 19, 2006	Banking transaction (wires)	Malvern C. Burnett to bank	Deposit of \$2,442 check paid by Sony Sulekha on/about November 19, 2006.
F 255	On or about November 19, 2006	Banking transaction (wires)	Michael Pol to bank	Deposit of \$2,442 check paid by Sony Sulekha on/ about November 19, 2006.
F 256	Between in or around mid-November 2006 and July 2007	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, Signal International, and Sachin Dewan	Discussions and transmission of materials related to H-2B visa extensions and green cards for Indian H-2B workers at Signal and representations to be made to workers regarding visa extensions and green cards. Specific information regarding these communications is largely in the sole possession of Defendants.
F 257	On or about November 18, 2006	In-person meeting at Dewan Consultants' d/b/a Medtech Consulting's offices in Dubai, UAE	Varuna Dewan, Dewan Consultants, and Kechuru Dhananjaya	Kechuru Dhananjaya gave Varuna Dewan 1,000 dirhams cash for the remaining balance on his second installment payment and an additional 2,900 dirhams for the H-2B visa. Varuna Dewan informed Kechuru

				Dhananjaya that he would have to pay a final 125,000 rupees installment in India before departing for the United States.
F 258	In or around late November 2006	Banking transactions in UAE and/or India	Sachin Dewan and Dewan Consultants	Deposit of approximately 1,000 dirhams given by Kechuru Dhananjaya to Varuna Dewan.
F 259	In or around late November 2006	Banking transactions in United States, UAE, and/or India	Malvern Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, Sachin Dewan, and Dewan Consultants	Deposit of 2,900 dirhams paid by Kechuru Dhananjaya. Specific information regarding these deposits and the division of monies among Defendants is largely in the sole possession of Defendants.
F 260	On or about November 21, 2006	In-person at Signal International labor camp in Pascagoula, Mississippi	John Sanders on behalf of Signal International, Palanyandi Thangamani, and other Signal employees	Meeting. Palanyandi Thangamani signed papers written in English. Palanyandi Thangamani was not given an opportunity to read the papers before signing them. John Sanders told Palanyandi Thangamani that he would be required to open a bank account at M&M Bank, where wages would be directly deposited by Signal International. John Sanders also told the workers that they would be required to pass a medical exam.
F 261	On or about November 22, 2006	Call from 5694-1617 to Hemant Khuttan's mobile phone (wires)	Representative of Dewan Consultants to Hemant Khuttan	Call from representative of Dewan Consultants informing Hemant Khuttan that he was required to attend a meeting at a lodge in south Delhi on/about November 27, 2006.
F 262	On or about November 24, 2006	In-person at Signal International labor camp in Pascagoula, Mississippi	John Sanders on behalf of Signal International, Palanyandi Thargamani, Sony Sulekha, and other Signal employees	Meeting. John Sanders told Palanyandi Thangamani, Sony Sulekha and others that they would be required to open a bank account at M&M Bank, where wages would be directly deposited by Signal International. John Sanders also told the workers that they would be required to pass a medical exam.

F 263	On or about November 24, 2006	In-person meeting at Dewan Consultants offices in Mumbai, India	Sachin Dewan, Dewan Consultants, and Kechuru Dhananjaya	Sachin Dewan required Kechuru Dhananjaya to sign H-2B visa paperwork and pay a draft of approximately 4,500 rupees for consular fees.
F 264	In or around late November 2006 through February 2007	Multiple calls from Kechuru Dhananjaya in Kechuru Upi, Karnataka, India, to Dewan Consultants offices in Mumbai, India (91-22-5694-1617)	Sachin Dewan, Ramesh LNU, Dewan Consultants to Kechuru Dhananjaya	Sachin Dewan and Ramesh reassured Kechuru Dhananjaya that he would receive his visa soon and would be able to work for Signal in the United States.
F 265	Weekly between in or around November and March 2008	Banking transaction (wires)	Signal International to Sony Sulekha	Transmission of wages to account at M&M Bank with deduction of \$35.00 per day for accommodations
F 266	Weekly between in or around November 2006 and March 2008	Banking transaction (wires)	Signal International to Palanyandi Thangamani	Transmission of wages to account at M&M Bank, with deduction of \$35.00 per day for accommodations. After a month, the salary increased from \$18 to \$18.50, then in March 2007 the salary was reduced to \$15.25 per hour.
F 267	In or around November 2006 through April 2007	Mails, or telephone, fax, and/or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Dubai, UAE; and/or Mumbai, India	Sachin Dewan, Dewan Consultants, Michael Pol, Global Resources, Malvern Burnett, Burnett Law Offices, GCILC, and Signal International	Discussions and transmission of materials related to recruitment of Indian workers in India and Dubai to work at Signal International. Specific information regarding these communications is in the sole possession of Defendants.
F 268	On or about November 27, 2006	In-person at lodge in south Delhi, India	Sachin Dewan, Sachin Dewan's brother, other representatives of Dewan Consultants, Hemant Khuttan, and approximately	Meeting. Mr. Dewan told Hemant Khuttan and the others that Signal will process the green cards while the workers were employed at Signal. on the H-2B visa. He said that they would be paid \$18/hour and

			40 other prospective Signal employees	\$27/hour for overtime.
F 269	On or about November 27, 2006	Banking transaction (wires)	Hemant Khuttan to bank to U.S. Consulate	Deposit of \$100 for visa interview fee.
F 270	On or about November 27, 2006	In-person at lodge in south Delhi, India	Representative of Dewan Consultants and Hemant Khuttan	Hemant Khuttan gave the representative of Dewan Consultants two receipts reflecting the \$100 visa interview deposit. One receipt was orange and one was yellow. The Dewan Consultants representative told Hemant Khuttan that the interview at the U.S. Consulate would be in the first or second week of December 2006. The Dewan Consultants representative told Hemant Khuttan that he would return to Delhi before the interview to prepare Hemant Khuttan.
F 271	On or about November 27, 2006	Call from 94472-59191 or 91-22-5694-1618 to Kurian David's India mobile phone (TBD) (wires)	Salimon on behalf of Dewan Consultants to Kurian David	Call to instruct Kurian David to bring cashier's check and copies of USCIS forms to Salimon's residence for U.S. consulate (Chennai) interview fee.
F 272	Between on or about November 28, 2006 and December 5, 2006	Call from Hemant Khuttan's mobile phone to 5694-1617 (wires)	Hemant Khuttan to representatives of Dewan Consultants	Nearly daily calls to Dewan Consultants requesting information regarding the U.S. consulate interview date.
F 273	On or about November 30, 2006	In-person at Salimon's residence in Mumbai, India	Salimon on behalf of Dewan Consultants to Kurian David	Kurian David delivers cashier's check (payable to private agency) and U.S. consulate interview fee to Salimon.
F 274	Between on or about November 30, 2006 and on or about January	Call from Kurian David India mobile phone (TBD) to 94472-59191, 91022-5694-1618, and	Kurian David to Salimon, on behalf of Dewan Consultants and Dewan Consultants	Nearly daily calls from Kurian David to Salimon and Sachin Dewan to check the status of the visa application. During the initial calls, and until late January 2007,

	25, 2007	971-4-391-2933 (wires)		Salimon denied having received the cashier's check for the U.S. consulate interview fee from Kurian David.
F 275	In or around November or December 2006	In-person delivery of payment to Dewan Consultants in Delhi	Shivram, an employee of Dewan Consultants office, and Kuldeep Singh	Kuldeep Singh made a second installment payment in cash to Shivram at the Delhi office of Dewan Consultants.
F 276	In or around November or December 2006	Banking transaction (wires)	Representative of Dewan Consultants to bank	Deposit of second installment paid by Kuldeep Singh in November or December 2006.
F 277	On or about December 1, 2006	U.S. Consulate in Chennai, India	Between consular officers and Muruganantham Kandhasamy	Conducted visa interview. Muruganantham Kandhasamy brought his marriage certificate, so the U.S. Consulate approved his visa application. Muruganantham Kandhasamy gave the U.S. consular officer his passport. The U.S. consular officer told him he would receive it in the mail with his visa affixed within three days. Muruganantham Kandhasamy's passport was not returned until he arrived at Sachin Dewan's office in Mumbai on January 23, 2007.
F 278	On or about December 3, 2006	In-person, Sachin Dewan's Mumbai office, India; Telephone call from Sachin Dewan to CJX Institute in Kochi, India; Telephone call from Sabulal Vijayan to CJX in Kochi, India	Sabulal Vijayan, Sachin Dewan, CJX Institute	Sachin Dewan said (approximate language), "You have to pay the full amount. You need to pay nearly 70,000 rupees" for third installment. Sachin Dewan said, "Get the money sent to Mumbai and then you can go." Sabulal Vijayan and Sachin Dewan argued. Sachin Dewan called CJX Institute in Kochi where Sabulal Vijayan had taken the first test and had Sabulal Vijayan call CJX. Sabulal Vijayan said his uncle would pay the money to CJX from Sabulal Vijayan's account and Sachin Dewan said if CJX agrees, that was

				okay.
F 279	On or about December 4, 2006	In-person, Mumbai medical clinic, India	Sabulal Vijayan, Sachin Dewan and other representatives of Dewan Consultants, and 30-40 prospective Signal employees attended	<p>Sabulal Vijayan went to a Mumbai clinic and paid 1,500 rupees to get the necessary medical certificate.</p> <p>A meeting that Sabulal Vijayan did not attend with Sachin Dewan, Siva Kumar, Manny Thomas, Jidesh, Denjut, and 30-40 people was happening at the clinic at the same time.</p>
F 280	On or about December 4, 2006	In-person, Dewan's office, India	Sabulal Vijayan, Sachin Dewan	Sabulal Vijayan signed documents and gave a thumb impression. Sachin Dewan took some original documents of Sabulal Vijayan's, include a receipt of Kurella Rao and Sachin Dewan's receipts and promissory notes. Sachin Dewan gave Sabulal Vijayan his passport and plane ticket.
F 281	On or about December 4, 2006	In-person meeting at Dewan Consultants' Mumbai, India office	Sachin Dewan, and representatives of Dewan Consultants Jacob Joseph Kadakkarappally and other prospective Signal employees.	Jacob Joseph Kadakkarappally paid third installment payments of approximately \$1,266 each for Sachin Dewan, Michael Pol, and Malvern Burnett and also Rs. 33,000 for the H-2B visa. Sachin Dewan or an employee of Dewan Consultants gave Jacob Joseph Kadakkarappally documents and told Jacob Joseph Kadakkarappally to sign them without giving Jacob Joseph Kadakkarappally time to read the documents.
F 282	On or about December 4 or 5, 2006	CJX Institute in Kolchi, India	Sabulal Vijayan's uncle, CJX Institute	Sabulal Vijayan's uncle gave the money to CJX.
F 283	On or about December 2006	In-person (India)	Sabulal Vijayan, Sachin Dewan	Sabulal Vijayan and other workers paid approximately \$1,000 to Sachin Dewan for

				flights on top of the fees that they had already paid.
F 284	On or about Dec. 5, 2006	In-person, Pascagoula, MS, U.S.	Sabulal Vijayan, Signal camp representative, Darrel Snyder, nearly 30 other workers (some who were promised green cards by J&M, and some who were promised green cards by IndoAmerisoft).	Sabulal Vijayan arrived in the U.S. and was transported to Signal's Pascagoula facility from Mobile, AL by Darrel Snyder.
F 285	On or about On or about December 5, 2006	Call from Hemant Khuttan's mobile phone to 5694-1617 (wires)	Representative of Dewan Consultants to Hemant Khuttan	Representative of Dewan Consultants told Hemant Khuttan that Sachin Dewan was coming to Delhi on/about December 9, 2006 and that Hemant Khuttan's interview with the U.S. consulate would be on/about December 11 or 12, 2006.
F 286	On or about December 6, 2006	In-Person Meeting at the Park Hotel, Chennai, India	Malvern Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, Signal International, Sachin Dewan, Thanasekar Chellappan and other prospective Signal employees.	Sachin Dewan informed the prospective Signal employees that they would have get visas and green cards to work at Signal. The prospective Signal employees were told it would cost about 8 Lakhs to process their papers and to work at Signal.
F 287	On or about December 6, 2006	Letter (dated December 6, 2006)	Thanasekar Chellappan and Sachin Dewan.	Letter addressed to Thanasekar Chellappan signed by Sachin Dewan, given in-person to Thanasekar Chellappan at the end of the meeting, with subject line, "Migration for United States of America Signal International." Letter states among other things, "The company shall proceed with your Green Card for United States of America." Letter lists the "Green Card

				Processing Fee” and how to remit payments to Malvern C. Burnett and Michale L. Pol.
F 288	On or about December 10-11, 2006	In-person at lodge in south Delhi, India	Sachin Dewan, Representative of Dewan Consultants, and Hemant Khuttan, and approximately 30 other prospective Signal employees	Sachin Dewan announced the date of the interviews at the U.S. consulate. Sachin Dewan told Hemant Khuttan and the others that there were some changes in the type of visa that they would receive, but that they should not worry, that the company (Signal) “will take care of you.” Sachin Dewan said that it’s almost the same visa as before. This was the first time that the H-2B visa had been mentioned to Hemant Khuttan. Sachin Dewan provided Hemant Khuttan instructions for his interview with the U.S. consulate. Sachin Dewan told Hemant Khuttan, “I’ll send a person with your group. He’ll give you the receipt before you get to the consulate. You’ll get an orange receipt back from the consulate, and you’ll hand it over to my person.” Sachin Dewan also told Hemant Khuttan that he would have to provide the Dewan Consultants address to the U.S. Consulate for the return of his passport.
F 289	On or about December 12, 2006	In parking lot in front of U.S. Consulate in New Delhi, India	Representative of Dewan Consultants and Hemant Khuttan.	The Dewan Consultants representative gave Hemant Khuttan a packet of information, including his biographical information form. He told Hemant Khuttan that he would be waiting in the parking lot, and when the interview was done, Hemant Khuttan was required to give the packet back to the Dewan Consultants representative. The Dewan Consultants representative also gave

				instructions to Hemant Khuttan how to respond to questions by the U.S. Consulate, including questions about recruiting fees and his intent to return to India at the expiration of this visa.
F 290	On or about December 12, 2006	U.S. Consulate in New Delhi, India	U.S. consular officers and Hemant Khuttan	Conducted visa interview. Hemant Khuttan's visa was approved. The consular officer told Hemant Khuttan that his passport would be returned via courier. As required by Sachin Dewan, Hemant Khuttan provided the Dewan Consultants address for the return of his passport. Hemant Khuttan did not receive his passport until he paid the final installment of his recruitment fee in Mumbai while en route to the United States.
F 291	On or about December 12-13, 2006	In-person Interview at the U.S. Embassy in Delhi	Kuldeep Singh	Went to in-person interview at the U.S. Embassy and received visa stamp into passport. The Embassy did not return Kuldeep Singh's passport to him.
F 292	On or about December 13, 2006	New Delhi, India	Krishan Kumar	Krishan Kumar had his interview at the U.S. Embassy.
F 293	On or about December 15, 2006	Call from 94472-59191 to Mr. Kandhasamy's cell phone	Salimon on behalf of Dewan Consultants to Muruganantham Kandhasamy	Salimon asked Muruganantham Kandhasamy, "Are you ready to go to the United States on December 18?" Muruganantham Kandhasamy told Salimon that he had recently married, so he had no money. Muruganantham Kandhasamy requested that he be permitted to go to the United States with the next group of workers. Salimon told Muruganantham Kandhasamy that his departure date would be moved to the next group workers going to the United

				States on January 3, 2007.
F 294	In or around December 2006	In-person, Pascagoula, MS, U.S.	Sabulal Vijayan, Sachin Dewan, Malvern Burnett, John Sanders, other Indian H-2B Signal employees.	Sachin Dewan and Malvern Burnett told the Indian H-2B Signal employees that Signal would provide them with at least two visa extensions and that Signal (through Malvern Burnett as Signal's lawyer) would apply for permanent residency status.
F 295	Every 2-3 days between on or about December 16, 2006 and on or about January 15, 2007	Call from Mr. Kandhasamy's cell phone to 91-22-5694-1618	Muruganantham Kandhasamy to Salimon and other representatives of Dewan Consultants	Almost daily calls from Muruganantham Kandhasamy requesting updates regarding his date of departure to the United States. During each call, Salimon or other representatives of Dewan Consultants told Muruganantham Kandhasamy that his airline ticket had not arrived yet.
F 296	On or about December 25, 2006	Call from 5694-1617 to Hemant Khuttan's mobile phone (wires)	Representative of Dewan Consultants to Hemant Khuttan	Representative of Dewan Consultants told Hemant Khuttan that his departure for the United States had been delayed because of the holidays, and that he would now be leaving on around January 23, 2007. The Dewan representative told Hemant Khuttan that he should submit the balance of his recruitment fee. Hemant Khuttan told the Dewan Consultants representative that he would pay the rest of the money in Mumbai en route to the United States.
F 297	In or around December 2006	Call from U.S. telephone to Dewan Consultants' telephone in Mumbai, India	Dewan Consultants representative and Andrews Issac Padavettiyil	Andrews Issac Padavettiyil called the Dewan Consultants Mumbai office to inquire about his immigration case and requested Michael Pol's contact information.
F 298	In or around late December 2006	Call from Andrews Issac Padavettiyil in Pascagoula, Mississippi, to Michael Pol in	Michael Pol and Global Resources to Andrews Issac Padavettiyil	Michael Pol instructed Andrews Issac Padavettiyil not to call him about his green card application, but to call Malvern Burnett instead.

		Mississippi		
F 299	In or around late December 2006	Mails within India	U.S. Embassy in Delhi and Dewan Consultants office in Mumbai	On information and belief, the U.S. Embassy mailed Kuldeep Singh's passport to Dewan Consultants' office.
F 300	On or about December 28, 2006	Banking Transaction (wires)	Thanasekar Chellappan and Malvern Burnett	Thanasekar Chellapan makes payment of 239,560 Rupees/USD \$5,373 to Malvern C. Burnett.
F 301	On or about December 28, 2006	Banking Transaction (wires)	Thanasekar Chellappan and Michael L. Pol	Thanasekar Chellapan makes payment of 239,560 Rupees/USD \$5,373 to Malvern C. Burnett.
F 302	In or around December 2006 or early January 2007	Banking transactions in United States, India, and/or Dubai, UAE	Sachin Dewan, Dewan Consultants Michael Pol, Global Resources, Malvern Burnett, Burnett Offices, GCILC	Deposit of funds collected from Thanasekar Chellapan on or about December 28, 2006.
F 303	In or around December 2006 or early January 2007	In-person Interview at the Embassy in Delhi	Thanasekar Chellappan and U.S. Embassy official	Went to in-person interview at the U.S. Embassy and received visa stamp into passport. The Embassy did not return Mr. Chellappan's passport to him.
F 304	On or about January 5, 2007	Call from public telephone at Signal International labor camp in Pascagoula, Mississippi, to 91 22 94472-59191 or +91-22-5694-1618	Palanyandi Thangamani to Salimon on behalf of Dewan Consultants	Call to inquire about status of green card application. Salimon told Palanyandi Thangamani not to worry; that he would get a green card.
F 305	On or about early to mid-January 2007	Banking transaction (wires)	Representative of Dewan Consultants to Jet Airways and American Airlines	<ul style="list-style-type: none"> • Purchase of airline ticket for Muruganantham Kandhasamy: Mumbai-London-Miami-Houston-Texas/Orange. • Purchase of airline ticket for Hemant Khuttan: Delhi-Mumbai-London-Chicago-Houston.
F 306	On or about	Call from 5694-1617 to	Representative of Dewan	Representative of Dewan Consultants called

	January 8, 2007	92 1279 8430 (wires)	Consultants to Hemant Khuttan	Hemant Khuttan to inform him that his flight was scheduled for January 23, 2007 and that he would first have to fly from Delhi to Mumbai. When Hemant Khuttan complained that the flight was too expensive, the Dewan representative told Hemant Khuttan that the flight had already been booked, and that Hemant Khuttan had to bring an additional 35,000 rupees for the airline tickets in addition to the approximately 200,000 rupee balance of the recruitment fee.
F 307	In or around the first week of January.	In-person, Signal camp, Pascagoula, MS, U.S.	Sabulal Vijayan, Malvern Burnett, Sachin Dewan, Signal company managers including John Sanders, and about 200 other Signal workers	Malvern Burnett said that the workers' green cards were being processed and that things would work out. He said the process was delayed because of the hurricane. Malvern Burnett said that he would ask for an extension for the workers' H-2B visas, which were valid through end of July or August, for ten months and then another ten months. Burnett, Dewan, or Sanders said that after the second extension, they would proceed with the workers' applications for green cards.
F 308	In or around January 2007	In-person, Signal camp, Pascagoula, MS, U.S.	Sabulal Vijayan, Sachin Dewan	When Sachin Dewan came to the camp, Sabulal Vijayan greeted him. Sachin Dewan told Sabulal Vijayan that he he believed that Sabulal Vijayan was "making problems" in the labor camp. Sabulal Vijayan told Sachin Dewan that he was just asking for food. Sabulal Vijayan told him to come to his room and see how bad it is. Sachin Dewan admitted that it was bad.
F 309	In or around	Telephone, Delhi, India	Krishan Kumar, Shivram on	Shivram called Krishan Kumar and told him

	January 2007		behalf of Dewan Consultants	his visa had arrived.
F 310	In or around January 2007	In-person, Shivram's office, New Delhi, India	Krishan Kumar, Shivram on behalf of Dewan Consultants	Shivram showed Krishan Kumar his passport and visa. They set a date on which Krishan Kumar would bring 11.5 lakhs rupees cash. Shivram said that if Krishan Kumar did not bring the money, Shivram would keep Krishan Kumar's passport.
F 311	In or around January 2007	In-person, Shivram's office, New Delhi, India	Krishan Kumar, Shivram on behalf of Dewan Consultants	Krishan Kumar paid 11.5 lakhs rupees in cash to Shivram. Shivram gave him his plane ticket from New Delhi to Mumbai. Shivram told him to meet Sachin Dewan to get his passport and ticket to the U.S. Shivram said that he would have to pay 35,000 rupees for his plane ticket and that Signal would reimburse him for the expense during his first week of work.
F 312	In or around January 2007	Sachin Dewan's office, Mumbai, India	Krishan Kumar, Salimon on behalf of Dewan Consultants	Salimon, an employee of Sachin Dewan, gave Krishan Kumar his passport and plane ticket. When Krishan Kumar asked about his green card, Salimon said that he did not know how or when Krishan Kumar would receive it but would surely get one. Salimon said that Signal would take care of this for him. Salimon said that if Krishan Kumar changed his mind about going to the U.S. that he would not get his money refunded to him.
F 313	On or about January 12, 2007	Facsimile transmission from 0481-250-5103 to public fax in Ernakulam, India	Salimon on behalf of Dewan Consultants to Kurian David.	Transmission of letter entitled "Sub: Migration for United States of America Signal International" indicating selection by Signal for employment, the required payment for the "Permanent Residence Visa," and a salary of \$18 per hour, 40 hours per week.

F 314	On or about January 15, 2007	Call from Mr. Kandhasamy's cell phone to +91-22-5694-1618.	Muruganantham Kandhasamy to Salimon on behalf of Dewan Consultants.	Salimon told Muruganantham Kandhasamy that his ticket had arrived, and that he would fly to the United States on January 23, 2007. Salimon told Muruganantham Kandhasamy that he would need to bring to the Seashell Hotel in Chennai on January 21, 2007 two separate cashier's checks in the amount of \$2,500 each payable to Malvern C. Burnett and Michael Pol, respectively, as well as 200,000 rupees cash for Sachin Dewan.
F 315	On or about December 2006 or January 19, 2007	Meeting at Signal International labor camp in Pascagoula, Mississippi	Sachin Dewan, Signal, and Sony Sulekha.	Signal executives and Sachin Dewan communicated that they would apply for H-2B extensions and green cards for Sony Sulekha and the other workers.
F 316	On or about mid-January 2007	In-person at the Seashell Hotel in Chennai, India	Salimon on behalf of Dewan Consultants and Muruganantham Kandhasamy	Meeting. Salimon told Muruganantham Kandhasamy that he would need to have a medical test before his departure to the United States. Once Muruganantham Kandhasamy passed the medical test (that same day), which cost him 2,000 rupees, Salimon gave him his airline ticket for the trip from Chennai to Mumbai. Salimon told Muruganantham Kandhasamy that he would need to take a taxi from the Mumbai airport to the Dewan Consultants office.
F 317	In or around mid January 2007	In-person meeting and payment at Dewan Consultants office in Delhi	Shivram, an employee of Dewan Consultants and Kuldeep Singh	Kuldeep Singh paid a third installment plus a two lakh extra fee to get his passport returned from Dewan Consultants. Only upon payment did Kuldeep Singh receive the ticket for a flight to Mumbai, where he could receive his passport and travel documents from Sachin Dewan.
F 318	In or around mid	Banking transaction	Representative of Dewan	Deposit of third installment paid by Kuldeep

	January 2007	(wires)	Consultants to bank	Singh in mid January 2007
F 319	In or around mid January 2007	In-person meeting at Dewan Consultants office in Mumbai	Sachin Dewan, Dewan Consultants and Kuldeep Singh	Kuldeep Singh went to the offices of Dewan Consultants in Mumbai and met with Sachin Dewan to receive his passport and other travel documents.
F 320	On or about January 21, 2007	In -person Payment	Thanasekar Chellappan.and Sachin Dewan	Thanasekar Chellapan makes final payment of 300,880 Rupees to Dewan Consultants.
F 321	On or about January 24, 2007	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of 300,880 rupees paid by Thanasekar Chellapan on/about January 21, 2007.
F 322	On or about the evening of January 22, 2007.	In-person at Dewan Consultants office in Mumbai, India	Manish Dewan, Representatives of Dewan Consultants and Hemant Khuttan	Hemant Khuttan and other prospective Signal employees were required to sign documents written in English. They were not given an opportunity to read the documents. Representatives of Dewan Consultants told Hemant Khuttan and the other workers that Signal wanted the documents signed for further processing in the United States; that the documents were for Social Security and for their green card; that it would take all night, and the workers would miss their flight if the workers insisted on reading the documents; that they did not have to sign the documents, but if they did not they would not get their passports back. Hemant Khuttan paid the 200,000 rupees balance of the fees charged him (850,000 rupees total), plus an additional 35,000 rupees for the airfare, to Sachin Dewan. After the forms were signed and the recruitment fees paid, Hemant Khuttan was provided his passport. The flight for the U.S. embarked at about 1 a.m. on/about January

				23, 2007.
F 323	On or about January 24, 2007	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of 235,000 rupees paid by Hemant Khuttan on/about January 22, 2007.
F 324	On or about January 23, 2007 starting between 5 p.m. and 6 p.m.	In-person at Dewan Consultants office in Mumbai, India	Sachin Dewan's brother on behalf of Dewan Consultants and Muruganantham Kandhasamy	Meeting attended by Muruganantham Kandhasamy and approximately 30-40 additional prospective Signal International employees. Muruganantham Kandhasamy handed to Sachin Dewan's brother a cashier's check in the amount of \$2,500 to Michael Pol, a cashier's check in the amount of \$2,500 to Malvern C. Burnett, and 200,000 rupees cash for Sachin Dewan. Muruganantham Kandhasamy and the other attendees were required to sign many documents written in English. They were not given any time to read the documents they were signing. Only after Muruganantham Kandhasamy delivered the payments and signed the documents did Sachin Dewan's brother hand him his passport and his airline ticket to the United States.
F 325	On or about January 24, 2007	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of 200,000 rupees paid by Muruganantham Kandhasamy on/about January 23, 2007.
F 326	On or about January 24, 2007	Banking transaction (wires)	Malvern C. Burnett to bank	Deposit of \$2,500 cashier's check paid by Muruganantham Kandhasamy on/about January 23, 2007.
F 327	On or about January 24, 2007	Banking transaction (wires)	Michael L. Pol to bank	Deposit of \$2,500 cashier's check paid by Muruganantham Kandhasamy on/about January 23, 2007.
F 328	On or about January 25, 2007	Call from 94472-59191 or 91-22-5694-1618 to	Salimon on behalf of Dewan Consultants to Kurian David	Call to inform Kurian David that consular interview was scheduled for on/about

		Kurian David's India mobile phone (TBD) (wires)		January 31, 2007.
F 329	On or about January 25, 2007	In-person at Signal International's Orange, Texas labor camp	"Mr. Ravi" and other Signal International representatives to Muruganantham Kandhasamy	Muruganantham Kandhasamy signed papers written in English. Muruganantham Kandhasamy was not given an opportunity to read the papers before signing them. A Signal representative also told Muruganantham Kandhasamy and others that they would be required to open a bank account at Capitol One Bank, where wages would be directly deposited by Signal International. The Signal representative also told the workers that they would be required to pass a medical exam.
F 330	On or about January 26, 2007	In-person at Signal International labor camp in Pascagoula, Mississippi	Darrel Snyder and Ramesh Guniseti on behalf of Signal International, and Hemant Khuttan	Meeting. Hemant Khuttan and other workers were required to sign 50 – 100 pages of documents. When Hemant Khuttan asked about the documents he was required to sign, Darrel Snyder said, "We don't have much time. If you want to sign, sign. Otherwise, we'll take care of you." This was said in a threatening tone and was viewed as a threat by Hemant Khuttan, who felt compelled to sign the documents. Hemant Khuttan then went to a meeting in another bunkhouse. There, a Signal representative told Hemant Khuttan and others that they would be required to open a bank account at M & M Bank, where wages would be directly deposited by Signal International. The Signal representative also told the workers that they would be required to pass a medical

				exam and another skills test. Hemant Khuttan passed both.
F 331	On or about January 31, 2007	In-person at hotel in Chennai, India	Salimon on behalf of Dewan Consultants and Kurian David	Salimon gave David Kurian documents to give to the U.S. consular officer during his interview. The dates on the documents were wrong, so Mr. Kurian had the consular interview delayed until the forms could be corrected.
F 332	On or about end of January 2007	Houston, TX and Pascagoula, MS, U.S.	Krishan Kumar, John Sanders, other workers.	Krishan Kumar arrived in the U.S. John Sanders picked up Krishan Kumar and other Indian workers in a bus from Houston. Krishan Kumar was transported to Signal's Pascagoula facility to start working.
F 333	Sometime between in or around January 2007 and March 2007	Pascagoula, MS, U.S.	Krishan Kumar, Signal representative	A Signal representative requested Krishan Kumar's passport, claiming there was a mistake in his I-94 form, so they could correct the mistake. Signal also requested the passports of a few other Indian workers.
F 334	Several times In or around January and February 2007.	In-person at Signal International labor camp in Pascagoula, Mississippi	John Sanders on behalf of Signal International and Sony Sulekha	Sony Sulekha and other workers asked Signal about the promises of permanent residency.
F 335	In or around January or February 2007	Mails, or electronic mail and/or fax. (wires)	Between Malvern C. Burnett, Michael Pol, Signal International, and Sachin Dewan	Transmission of forms and other materials from the United States to the Dewan Consultants office in Mumbai, India, for prospective Signal International employee signatures prior to departure to the United States. Specific information regarding these communications is largely in the sole possession of Defendants.
F 336	Weekly between in or around January 2007 and	Banking transaction (wires)	Signal International to Hemant Khuttan	Transmission of wages to account at M & M Bank, with deduction of \$35.00 per day for accommodations.

	March 2008			
F 337	Weekly between in or around January 2007 and March 2008	Banking transaction (wires)	Signal International to Muruganantham Kandhasamy	Transmission of wages to account at Capitol One Bank, with deduction of \$35.00 per day for accommodations.
F 338	In or around early to mid-February 2007	Calls from Ramesh in Dewan Consultants offices in Mumbai, India, (91-22-5694-1617) to Kechuru Dhananjaya in Kechuru Upi, Karnataka, India	Ramesh and Dewan Consultants to Kechuru Dhananjaya	Dewan Consultants representative instructed Kechuru Dhananjaya regarding the details of his consular interview in Chennai, India, for the H-2B visa.
F 339	In or around February 2007	In-person meeting at Signal labor camp in Pascagoula, MS	Sachin Dewan, Malvern C. Burnett, Signal representatives, Jacob Joseph Kadakkarappally and other Indian H-2B Signal employees.	Sachin Dewan and Malvern Burnett informed migrant workers that Signal would process green cards for the current H-2B workers.
F 340	In or around February 2007	In-person, Signal camp, Pascagoula, MS, U.S.	Sabulal Vijayan, Malvern Burnett, Signal company managers, and almost all Indian H-2B Signal employees.	Burnett said that that he'd try for an extension of their visas and then apply for green cards for them.
F 341	On or about February 5, 2007	In-person at hotel in Chennai, India	Salimon on behalf of Dewan Consultants and Kurian David	Salimon gave Kurian David documents to give to the U.S. consular officer during his interview.
F 342	On or about February 5, 2007	In-person at U.S. Consulate in Chennai, India	U.S. consular officers and Kurian David	Collected passports and conducted visa interviews. Kurian David's passport was not returned until he left for the United States on/about February 15, 2007.
F 343	On or about February 6, 2007	Mail from U.S. Consulate in Chennai, India, to Dewan	Between U.S. consular officers and Sachin Dewan/Dewan Consultants	David Kurian's passport with H-2B visa affixed mailed to Dewan Consultants office.

		Consultants office in Mumbai India (mails)		
F 344	On or about February 6, 2007	Call from 94472-59191 or 91-22-5694-1618 to Kurian David India mobile phone (TBD) (wires)	Salimon on behalf of Dewan Consultants to Kurian David	Call to inform Kurian David that the visa had been approved. Salimon told Kurian David to pick up his airline ticket at a travel agency in Kochi, India; that he would have to disembark in Mumbai, travel to the Dewan Consultants office, pay the balance of his recruitment fee, retrieve his passport, and then fly to the United States.
F 345	Weekly between in or around February 2007 and March 2008	Banking transaction (wires)	Signal International to Kurian David	In the beginning, Kurian David was paid about \$19 per hour; by the time his employment ended, he was paid \$21.70 per hour.
F 346	On or about February 14, 2007	In-person at Dewan Consultants office in Mumbai, India	Between Sachin Dewan/Dewan Consultants and Kurian David	Delivery of second and third recruitment fee installments to Sachin Dewan. Kurian David provided Sachin Dewan with a check payable to Malvern C. Burnett in the amount of \$2,442, a check payable to Michael Pol in the amount of \$2,442, and a cash payment to Sachin Dewan equivalent to \$2,442. Kurian David was also required to make a separate cash payment in the amount of 60,000 rupees for what Sachin Dewan claimed was a round-trip airline ticket between Mumbai and Houston, Texas. Sachin Dewan provided Kurian David with some printed forms written in English, including the Attorney Services Agreement with Malvern Burnett, the Memorandum of Understanding with Dewan Consultants, and the Global Resources agreement. Kurian David was required to sign the forms without reading

				them and pay the fees in order to receive his passport for the journey to the United States.
F 347	On or about February 14-16, 2007	Banking transaction (wires)	Representative of Dewan Consultants to bank	Cash deposit of the rupees equivalent of \$2,442, and of 60,000 additional rupees paid by Kurian David on/about February 14, 2007.
F 348	On or about February 14-16, 2007	Banking transaction (wires)	Malvern C. Burnett to bank	Deposit of \$2,442 check paid by Kurian David on/about February 14, 2007.
F 349	On or about February 14-16, 2007	Banking transaction (wires)	Michael Pol to bank	Deposit of \$2,442 check paid by Kurian David on/about February 14, 2007.
F 350	On or about February 14-16, 2007	Mails, or electronic mail or fax (wires)	Unknown to/within Signal International	Transmission of initial employment documents for execution by Kurian David and other new Indian employees. Specific information regarding these communications is currently being produced.
F 351	On or about February 14-16, 2007	In-person at Signal International, Orange, Texas facility	Signal International and Capitol One Bank to Kurian David	Signal International-organized meeting for signing of initial employment documents by Kurian David and other new Indian employees. The employees were not given the opportunity to read the documents before signing. Signal told Kurian David and others that they would be required to open a bank account at Capital One, where wages would be directly deposited by Signal International. Bank professionals attended the meeting to assist with the paperwork to set up the accounts.
F 352	On or about February 15, 2007	In-person meetings with Dewan Consultants representative Mr. Salimon at hotel near	Mr. Salimon, Dewan Consultants, and Kechuru Dhananjaya	Salimon instructed Kechuru Dhananjaya regarding the H-2B visa interview and reviewed Kechuru Dhananjaya's H-2B visa paperwork.

		U.S. Consulate in Chennai, India		
F 353	On or about February 26, 2007	In-person at Signal worksite in Pascagoula, Mississippi	Darrell Snyder on behalf of Signal International, and Hemant Khuttan	Darrell Snyder informed Hemant Khuttan that his hourly wage would be reduced from \$18 to \$12 per hour (Hemant Khuttan's pay was actually reduced to \$13 per hour). Hemant Khuttan was required to sign a form agreeing to the wage change. Darrel Snyder told Hemant Khuttan, "You have to sign the paper if you want to stay here. If you don't, we'll terminate and deport you."
F 354	In or around late February or early March, 2007	In-person meeting with Ron Schnoor	Ron Schnoor to Palanyandi Thangamani	Meeting. Ron Schnoor of Signal told Palanyandi Thangamani that his salary would be reduced to \$15.25 per hour. Ron Schnoor didn't give a reason, but said his salary would go back up at a future date. Subsequent wages transmitted through the wires to M & M Bank reflected this lower hourly rate.
F 355	In or around March 2007	Telephone call from Pascagoula, MS, U.S. to New Delhi, India	Krishan Kumar, Shivram	Krishan Kumar called Shivram in New Delhi and asked about his green card. Shivram said that his job was to get him to Signal and that after that, it was Signal's responsibility. Shivram said that a green card takes time and that he needed to be patient.
F 356	Several times in or around March, April, and May 2007.	In-person at Signal International labor camp in Orange, Texas	Camp Manager and Foreman on behalf of Signal International and Kurian David	Kurian David and other workers asked Signal about the promises of permanent residency.
F 357	On or about March 7, 2007	Telephone, Salimon called from Kotteym, Cothin, Kerala, India to Sabulal Vijayan's wife in	Sabulal Vijayan's wife, Salimon	Salimon called Sabulal Vijayan's wife and asked for Sabulal Vijayan's cell number in the U.S. His wife claimed that Sabulal Vijayan did not have a phone number.

		India		Salimon said, "Everybody has a phone number in America. Why doesn't he?"
F 358	On or about March 7, 2007	Telephone, Vijayan's wife in India called Vijayan in Signal camp, Pascagoula, MS, U.S.	Sabulal Vijayan, Sabulal Vijayan's wife	Sabulal Vijayan's wife called Sabulal Vijayan and told him that Sachin Dewan's office called her.
F 359	On or about March 8, 2007	In person at Signal International labor camp in Pascagoula, Mississippi	Ron Schnoor of Signal, and Malvern Burnett, to Palanyandi Thangamani, Hemant Khuttan, Sony Sulekha, and other Indian H-2B Signal employees.	Ron Schnoor warned Palanyandi Thangamani, Hemant Khuttan, Sony Sulekha, and other Indian workers that if any of the Indian workers brought legal claims against Signal, they would all be terminated and deported. Conversely, if the workers behaved, they would be able to stay at Signal permanently.
F 360	On or about March 8, 2007	Telephone, Vijayan in Signal camp, Pascagoula, MS, U.S. called Sachin Dewan's office in Mumbai, India	Sabulal Vijayan, Sachin Dewan	Sabulal Vijayan called Sachin Dewan, and Sachin Dewan admitted that he had Salimon call Sabulal Vijayan's wife to find out Sabulal Vijayan's phone number in the U.S. Sachin Dewan told him that Signal told him that Sabulal Vijayan was the leader of the workers who were complaining about conditions at Signal. Sabulal Vijayan asked him how he knew and who had told him this. Sachin Dewan said, "Nobody told me. I know through the company." Sachin Dewan told Vijayan, "Stop organizing meetings and speaking for people," and, "If you don't, the company will send everybody back to India."
F 361	On or about March 8, 2007	In-person, Signal camp, Pascagoula, MS, U.S.	Sabulal Vijayan, Malvern Burnett, Signal company and camp managers (including Signal vice president Ron Schoor), and about 300	The Signal vice president Ron Schnoor said that he knew that Sabulal Vijayan and the other workers were having meetings to discuss their legal rights. He said that Signal intended to fight the workers.

			Signal workers	Malvern Burnett said that he knew about the T visas and that no one would get a T Visa.
F 362	On or about the second week of March 2007	In-person at Signal International labor camp in Pascagoula, Mississippi	Malvern C. Burnett, John Sanders, three other Signal staff, and Sachin Dewan, to Palanyandi Thangamani, Hemant Khuttan, Sony Sulekha, and other Indian workers.	Malvern C. Burnett told Palanyandi Thangamani, Hemant Khuttan, Sony Sulekha, and the other employees that they had a 10-month visa, and that they would get a green card before the 10-month visa expired. Malvern Burnett also said "I know the law here. Don't mess with us." Sachin Dewan told the workers "I can do anything to you; you can't do anything to me." Sachin Dewan possibly also told Palanyandi Thangamani, Hemant Khuttan, Sony Sulekha and others that they would get green cards. John Sanders threatened workers that Signal would only continue with applying for H-2B extensions and permanent residence for the workers if the workers stopped meeting with lawyers.
F 363	In or around March 2007	Multiple calls between Kechuru Dhananjaya in Kechuru Upi, Karnataka, India and Dewan Consultants offices in Mumbai, India (91-22-5694-1617)	Sachin Dewan, Ramesh LNU, and Dewan Consultants to Kechuru Dhananjaya	Making arrangements for Kechuru Dhananjaya's departure for the United States on Signal H-2B visa.
364	On or about March 15, 2007	In-person at Signal International Orange, Texas labor camp	Signal International representatives and upon information and belief Malvern Burnett to Kurian David and other Indian H-2B Signal employees.	Signal representatives and Malvern Burnett said that if Texas workers conducted activities "like the workers in Mississippi" they would be deported. They told Kurian David and other Indian H-2B Signal employees that they would apply for green

				cards for all of them.
F 365	On or about April 2, 2007	In-person meeting at Dewan Consultants offices in Mumbai, India	Sachin Dewan, Dewan Consultants, and Kechuru Dhananjaya	Sachin Dewan and Kechuru Dhananjaya discussed arrangements for final departure.
F 366	On or about April 10, 2007	In-person meeting at Dewan Consultants offices in Mumbai, India	Sachin Dewan, Dewan Consultants, and Kechuru Dhananjaya	Sachin Dewan and/or an employee of Dewan Consultants required Kechuru Dhananjaya to sign paperwork. Kechuru Dhananjaya gave Sachin Dewan 125,000 rupees cash as the final installment payment.
F 367	In or around mid-to late-April 2007	Banking transactions in India and United States	Sachin Dewan, Dewan Consultants, Malvern Burnett, Global Resources, Malvern C. Burnett, Burnett Law Offices, GCILC	Deposit of various portions of approximately 125,000 rupees given by Kechuru Dhananjaya to Sachin Dewan.
F 368	In or around June 2007	In-person meeting between Andrews Issac Padavettiyil and Malvern Burnett in Burnett's New Orleans, Louisiana office	Malvern Burnett, Burnett Law Offices, GCILC, and Andrews Issac Padavettiyil	Andrews Issac Padavettiyil went to Malvern Burnett's office to inquire about his application for visa extension. He was told that his application had been lost and had to be resubmitted. Malvern Burnett also advised Andrew Issac Padavettiyil to continue working at Signal in order to obtain a green card. Andrews Issac Padavettiyil paid Malvern Burnett \$100 fee in cash for meeting with him that day as well as a check of \$470 to apply for legal permanent residency. Malvern Burnett did not clarify which employer's name would be used in the application for permanent residency: J&M Associates or Signal International.
F 369	On or about June 11, 2007	In-person at Signal International Orange, Texas labor camp	Rodney Meisetschlaeger on behalf of Signal International and Muruganantham Kandhasamy	Delivery of letter entitled "RE: Visa Extension Application" promising that Signal was in the process of applying for a visa extension, and that the extension would

				be through May 31, 2008.
F 370	On or around June 20, 2007	Electronic mail	Malvern C. Burnett to Jacob Joseph Kadakkarappally	Malvern Burnett tells Jacob Joseph Kadakkarappally to contact Sachin Dewan for information about his labor certification number or file number.
F 371	In or around June or July 2007	In-person meeting at Signal labor camp in Pascagoula, Mississippi	Darrel Snyder of Signal International, Andrews Issac Padavettiyil, and other workers	The Signal camp boss Darrel Snyder told workers that Signal would apply for an H-2B visa extension for the workers.
F 372	In or around July 2007	Mails, to Signal labor camp in Pascagoula, Mississippi	Signal International representative to Andrews Issac Padavettiyil	Andrews Issac Padavettiyil received a letter in his labor camp mailbox stating that Signal would apply for H-2B visa extensions.
F 373	On or about July 26, 2007	Mail, fax, or electronic mail (wires)	Darrell Snyder to United States Citizenship and Immigration Service's Vermont Service Center	Darrel Snyder signs H-2B extension letter to USCIS's Vermont Service Center stating that the foreign workers would work for a specified period of time, receive the prevailing wage, and return to their home country at the end of the period.
F 374	In or around July or August 2007	U.S. mail from New Orleans, Louisiana, to Pascagoula, Mississippi	Malvern Burnett, Burnett Law Offices, and GCILC to Andrews Issac Padavettiyil	Malvern Burnett mailed back Andrews Issac Padavettiyil's check for approximately \$475 and requested a check for \$190 made out to Burnett.
F 375	On or about August 15, 2007	In-person meeting between Andrews Issac Padavettiyil and Malvern Burnett in Burnett's New Orleans, Louisiana office	Malvern Burnett, Burnett Law Offices, GCILC, and Andrews Issac Padavettiyil	Andrews Issac Padavettiyil went to Malvern Burnett's office to inquire about the check for approximately \$470 that was returned to him in July or August 2007. He was told that he only needed to pay \$190.00 to reopen his

				<p>application.</p> <p>Andrews Issac Padavettiyil provided Malvern Burnett with a check for \$190.00. Malvern Burnett did not tell Andrews Issac Padavettiyil whether the check was to re-apply for the I-140 application or I-129 application. Andrews Issac Padavettiyil also paid the \$100 fee in cash to meet with Malvern Burnett.</p>
F 376	In or around September or October 2007	In-person at Signal International labor camp in Pascagoula, Mississippi	Malvern C. Burnett, Hemant Khuttan, and others	<p>Meeting to discuss immigration status. Malvern Burnett told Hemant Khuttan and others that it would not be a problem if the company did not get a visa extension; that he would find Hemant Khuttan and the other workers a job and legal status if they gave him more money.</p>
F 377	In or around October 2007	In-person meeting between Andrews Issac Padavettiyil and Malvern Burnett in New Orleans, Louisiana	Malvern Burnett, Burnett Law Offices, GCILC, and Andrews Issac Padavettiyil	<p>Andrews Issac Padavettiyil paid \$100 consultation fee in cash and \$190 via check made out to Malvern Burnett.</p>
F 378	In or around October 2007	Banking transactions in United States	Malvern Burnett, Burnett Law Offices, GCILC	<p>Deposit of \$190 check received from Andrews Issac Padavettiyil.</p>
F 379	In or around November 2007	In-person at law office of Malvern C. Burnett	Malvern C. Burnett, Kurian David, and other Indian H-2B Signal employees	<p>When Kurian David concluded he was not getting a green card, he went to see Malvern Burnett and paid him \$100. Malvern Burnett told Kurian David that Signal fired him (Malvern Burnett) so he could not help him.</p>
F 380	In or around November 2007	Banking transaction (wires)	Malvern C. Burnett to bank	<p>Deposit of \$100.00 payments made by Kurian David and other Signal employees in November 2007.</p>
F 381	In or around late 2007 or early	In person meeting at Malvern Burnett's office	Malvern Burnett and Sony Sulekha	<p>Sony Sulekha went to Malvern Burnett's office to inquire about the green card</p>

	2008	in New Orleans, LA		processing. Sony Sulekha paid Malvern Burnett \$50 as consultation fee for the meeting. Malvern Burnett told Sony Sulekha that he had filed for an extension of his H-2B visa and he would try to get the extension, but failed to state that Sony Sulekha's and others' H-2B visas were actually no longer valid.
F 382	In or around late 2007 or early 2008	Banking transaction (wires)	Malvern C. Burnett to bank	Deposit of \$50.00 payment made by Sony Sulekha
F 383	In or around December 2007	In-person meeting at Signal labor camp in Pascagoula, Mississippi	Darrel Snyder on behalf of Signal International, Andrews Issac Padavettiyil, and other Signal employees	Signal camp boss Darrel Snyder informed workers that because they had arrived on H-2B visas they were not eligible for green cards, but that Signal would apply for another H-2B visa extension.
F 384	In or around December 2007	Call from public telephone at Signal International Orange, Texas labor camp to law office of Malvern C. Burnett (wires)	Signal employee to representative of Malvern C. Burnett	Telephone call to schedule meeting with Malvern C. Burnett. The receptionist explained that any Signal employee attending the meeting would have to pay \$100 each to meet with Malvern. Burnett.
F 385	In or around December 2007	In-person at law office of Malvern C. Burnett	Malvern C. Burnett, Muruganantham Kandhasamy, and other Signal employees	Malvern Burnett told Muruganantham Kandhasamy that he should not worry about his green card; that it is still being processed; that he would get an extension of his H-2B visa; and that the H-2B visa would turn into a green card. Malvern Burnett told Muruganantham Kandhasamy that he would call him later with any updates. Muruganantham Kandhasamy and other workers paid Malvern Burnett \$100 each for the meeting, which lasted approximately five

				minutes.
F 386	In or around December 2007	Banking transaction (wires)	Malvern C. Burnett to bank	Deposit of \$100.00 payments made by Muruganantham Kandhasamy and other Signal employees in December 2007.
F 387	In or around February 2008	In-person at Signal International Texas, Orange labor camp	Mr. Ravi on behalf of Signal International, Muruganantham Kandhasamy, and other Signal employees	Meeting. The workers were told that they would be moved to Signal International's Pascagoula, Mississippi facility, and that their wages would be reduced by \$3.70 per hour. The Signal International representative also delivered to the workers a letter describing the changes.
F 388	In or around end of February 2008	In-person at Signal International labor camp in Pascagoula, Mississippi	Signal's new immigration attorney (Patricia Bollman) and Darrell Snyder of Signal, Hemant Khuttan, and other Indian workers.	Patricia Bollman said that Malvern C. Burnett had not filed the paperwork for Signal and its employees. She said she needed all the paperwork again (experience certificates, etc.). She said that everyone had to stay through 3 extensions and then the company would file their I-140s.