

PROCEEDS OF INDICTABLE OFFENCE(S)/INSTRUMENT OF SERIOUS OFFENCE(S)

5. As stated above in paragraph 4, I suspect that the property specified in that paragraph is the proceeds of an indictable offence or offences and/or an instrument of a serious offence or offences, and in particular that it is the proceeds and/or the instrument of a money laundering offence under *The Criminal Code 1995 (Cth)* (**Criminal Code**) committed by each of the Russians named in paragraph 4 respectively. Specifically, and in relation to the specified property, I suspect that each of the Russians has committed the following indictable offence which carries a maximum penalty of imprisonment for 3 years and which is also a serious offence as defined in s 338 of the Act:-

(a) Between 6 April 2011 and 23 August 2013 in the State of Queensland, each of the Russians named in paragraph 4 dealt with money, in that each of them received and possessed money and engaged in a banking transaction or transactions relating to money, it being reasonable to suspect that such money was proceeds of crime and at the time of dealing, the value of the money or property was \$100,000 or more, contrary to s 400.9(1) of the Criminal Code.

6. The grounds for my suspicions detailed above are outlined in paragraphs 7 to 195 below.

GROUND'S FOR SUSPICION

EDUARD KARMADONOV

7. KARMADONOV, born 26 May 1968 and aged 45, is a citizen of the Russian Federation and resides in Irkutsk, Russia, a city of nearly 600,000 people located in South Eastern Siberia some 100 km or so from the Mongolian border.
8. KARMADONOV is employed as a Commercial Director by JSC BAYKALKVARTSSAMOTSVETY, a company that is believed to be engaged in the extraction and processing of precious and semiprecious stones; extraction of natural abrasives, pumice, asbestos, mica, quartz and other non-metal minerals, not included into other groups. On the evidence available, I suspect that KARMADONOV's salary equates to approximately AUD \$24,879 per year.