

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 3:07CR134 (JBA)</b>
	:	
	:	<b>VIOLATIONS:</b>
v.	:	<b>18 U.S.C. § 371 (Conspiracy)</b>
	:	<b>33 U.S.C. § 1908(a) (APPS Violation)</b>
<b>IONIA MANAGEMENT S.A.</b>	:	<b>18 U.S.C. § 1519 (Falsification of Records in Federal Investigation)</b>
	:	<b>18 U.S.C. § 1505 (Obstruction)</b>
	:	<b>18 U.S.C. § 2 (Aiding and Abetting)</b>

**GOVERNMENT’S SUPPLEMENTAL WITNESS LIST**

The United States of America, by and through its undersigned attorneys, respectfully submits the following supplemental witness list. For ease of reference, the only modification to the Government’s original witness list filed on August 1, 2007, is that witness number 20, Clarence Santos from Gallagher Marine, has been replaced with Mr. David Barry, also of Gallagher Marine.

1. LCDR Alan Blume, United States Coast Guard
2. Investigator Dawn Kallen, United States Coast Guard
3. Chris Vannata, United States Coast Guard
4. CWO Lee Scott Howell, United States Coast Guard
5. CWO Robert T. Stewart, United States Coast Guard (Retired)
6. LT Craig Toomey, United States Coast Guard
7. Resident Agent in Charge Eric Gempp, United States Coast Guard
8. John McLeod, Coast Guard Auxiliary
9. LT Travis Emge, United States Coast Guard
10. LT Kevin McDonald, United States Coast Guard
11. Dario Calubag
12. Elmer Senolay

13. Ricky Lalu
14. Benido Matugas
15. Ronaldo Balena
16. Romeo Arquio
17. Nelson Alejandro
18. Edgardo Mercurio
19. Alexander Guevarra
20. David Barry, Gallagher Marine
21. Chief Engineer James G. Shirley, III, Military Sealift Fleet Support Command
22. Dr. Jerry Galt, Genwest System, Inc.
23. Kristy Juare, Chemist, United States Coast Guard Marine Safety Laboratory
24. Joseph Ferrante, Special Agent, Environmental Protection Agency, Criminal Investigation Division
25. Senad Metjahic, Special Agent, Environmental Protection Agency, Criminal Investigation Division
26. Martjin van Kolk, Inspector/Superintendent, Ministry of Transport, Public Works, and Water Management, The Netherlands
27. Arie Cromwijk, Netherlands Coast Guard Operations Center
28. Special Agent John Petricig, United States Secret Service
29. Special Agent Matt Fasulo, United States Secret Service
30. CW O Adrian Kavanagh, United States Coast Guard



CERTIFICATION OF SERVICE

I hereby certify that on August 20, 2007, a copy of the foregoing Government's Supplemental Witness List was filed electronically and served by mail upon anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

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WILLIAM M. BROWN, JR. (ct20813)  
ASSISTANT UNITED STATES ATTORNEY