

United States Courts
Southern District of Texas
FILED

SEP 16 2014

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

David J. Bradley, Clerk of Court

14 CR 0444

UNITED STATES OF AMERICA

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§
§

V.

CRIMINAL NO. _____

PATRICK JEAN ZUBER

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

Introduction

1. In and around January 2007, the defendant, PATRICK JEAN ZUBER, a manager for international subsidiaries of Weatherford International Ltd. ("Weatherford"), and others known and unknown to the United States Attorney, knowingly combined, conspired, confederated, and agreed with each other to commit an offense against the United States, to wit: (a) to fraudulently re-export and attempt to re-export items subject to the Export Administration Regulations of the United States, namely, oilfield service equipment to Iran and the Government of Iran or for their benefit, contrary to the laws and regulations of the United States; and (b) to fraudulently facilitate the sale of such oilfield service equipment, prior to exportation, knowing the same to be intended for re-exportation contrary to the law and regulations of the United States, in violation of Title 18, United States Code, Sections 371 and 554.

Background

2. Weatherford International, Inc. is a company organized under the laws of the State of Delaware, with its headquarters in Houston, Texas. Prior to June 26, 2002, Weatherford International, Inc. was the ultimate parent company of all Weatherford subsidiaries worldwide. On June 26, 2002, Weatherford International, Inc. merged with Weatherford International, Ltd. (“Weatherford”), a limited liability company organized under the laws of Switzerland. Through this process Weatherford International, Ltd. became the ultimate parent company of the Weatherford worldwide affiliates. Weatherford’s headquarters moved to Ireland. It maintains its corporate offices in Houston, Texas. Weatherford International, Inc. remains a Delaware corporation, headquartered in Houston, Texas. Weatherford is one of the world’s largest oilfield service companies with annual corporate revenues of over \$15 billion. Headquartered in Houston, Texas, Weatherford offers specialized drilling systems and technology.
3. During the applicable period, Weatherford was a complex organization, comprising more than 500 legal entities.
4. Weatherford Oil Tool Middle East Limited (“WOTME”) was a wholly owned subsidiary of Weatherford and was incorporated in the British Virgin Islands and headquartered in Dubai, United Arab Emirates. Among other functional responsibilities, WOTME managed most of the company’s activities, including those of Weatherford’s Middle East and North Africa (“MENA”) Underbalanced Drilling business unit.

The Defendant and His Co-Conspirators

5. PATRICK JEAN ZUBER was a United States lawful permanent resident and, during the applicable period, employed by various of these Weatherford entities. On January 6, 2007, ZUBER was promoted to Vice President of MENA East and returned to WOTME to oversee its operations in India, Saudi Arabia, Yemen, Oman, Qatar, Turkmenistan, and Pakistan.
6. Co-Conspirator A was a citizen of the United States who, during the applicable period, was a Weatherford Country Manager in Thailand.
7. Co-Conspirator B was a citizen of Canada who, during the applicable period, was a Vice President of Weatherford's MENA West and responsible for operations in Algeria, United Arab Emirates, Iran, Libya, Iraq, Egypt, Bahrain, Sudan, Syria, Tunisia, Morocco, and Mauritania.

COUNT ONE

[18 U.S.C. §§ 371 and 554]

(Conspiracy to Smuggle Goods from the United States)

8. The allegations in Paragraphs 1 through 7 of the General Allegations are incorporated and re-alleged by reference in this Count.
9. In or around January 2007, in Houston, Texas in the Southern District of Texas, and elsewhere, the defendant

PATRICK JEAN ZUBER

and others known and unknown to the United States Attorney, knowingly combined, conspired, confederated, and agreed with each other to commit an offense against the United States, to wit:

- a. to fraudulently re-export and attempt to re-export items subject to the Export Administration Regulations of the United States, namely, oilfield service equipment, to Iran and the Government of Iran or for their benefit, and
- b. to fraudulently facilitate the sale of such oilfield service equipment, prior to re-exportation, knowing the same to be intended for re-exportation contrary to the law and regulations of the United States, all in violation of Title 18, United States Code, Sections 371 and 554.

Objects of the Conspiracy

10. The objects of the conspiracy were:

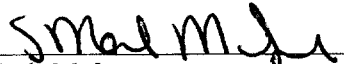
- a. to make a profit by exporting oilfield service equipment to or for the benefit of Iran;
- b. to receive financial payments from entities owned and operated by the Government of Iran and others providing services to such;
- c. to evade the export and re-export requirements of U.S. laws and agencies; and
- d. to conceal the prohibited activities and transactions from detection by the United States government so as to avoid penalties and disruption of the illegal activity.

Overt Acts

11. PTTEP is a national petroleum exploration and production company located in Thailand. Between in or about 2005 through in or about 2007, PTTEP conducted geological and geophysical and seismic surveys in Iran with the intention of drilling an exploration well in the Saveh Block region of Iran.

12. On January 30, 2007, Zuber received an email from Co-Conspirator A asking what services (which would require the provision of related equipment) Weatherford and WOTME could provide to PTTEP as PTTEP set up its operations in Iran. Zuber forwarded the request to Co-Conspirator B. Zuber did this act with knowledge that facilitating the sale of equipment subject to the Regulations by WOTME to be re-exported from the United States through the United Arab Emirates and ultimately to Iran was a violation of 18 USC §§ 371 and 554.

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