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9 Attorneys for Specially-Appearing Defendants
10 Pangang Group Company, Ltd., Pangang Group
Steel Vanadium & Titanium Company, Ltd.,
11 Pangang Group Titanium Industry Company,
Ltd., and Pangang Group International Economic
& Trading Company

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14
15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 PANGANG GROUP COMPANY, LTD.,
19 PANGANG GROUP STEEL VANADIUM &
TITANIUM COMPANY, LTD.,
20 PANGANG GROUP TITANIUM
INDUSTRY COMPANY, LTD., and
21 PANGANG GROUP INTERNATIONAL
ECONOMIC & TRADING COMPANY,

22 Defendants.
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CASE NO. CR 11-0573 JSW

**DECLARATION OF WANG GANG IN
SUPPORT OF SPECIALLY-APPEARING
DEFENDANTS' SECOND MOTION TO
QUASH SERVICE OF SUMMONSES**

Hearing Date: March 21, 2013 at 2:00 p.m.

DECLARATION OF WANG GANG

I, WANG GANG, declare as follows:

1. I make this declaration of personal, firsthand knowledge and if called and sworn as a witness, I could and would testify competently thereto.
2. I, along with my wife, are the sole owners of the Chengdu West Union Chemical Corporation, located Chengdu, Sichuan Province, China ("West Union"). West Union is a trade and technical consultancy company. West Union is not owned, affiliated, operated or controlled by Pangang Group Company Ltd. ("Pangang Group"), Pangang Group Titanium Industry Co., Ltd., ("Pangang Group Titanium") or any of their affiliated companies.
3. I also control a company called Tinox Chemical LLC ("Tinox"). This company is located in Chicago, Illinois. Mr. Hao Xie is an investor in Tinox. Tinox is not owned, affiliated, operated or controlled by Pangang Group or Pangang Group Titanium or any of their affiliated companies. Thus far, Tinox has not conducted any business of any kind. There are no actual employees of Tinox.
4. In 2011, I caused the creation of Pangang Titanium Industry Co., Ltd., in Hong Kong ("HK Titanium"). Attached hereto as Exhibit 1 is a true and correct copy of the Certificate of Incorporation. HK Titanium is not owned, affiliated, operated or controlled by Pangang Group or Pangang Group Titanium or any of their affiliated companies. To the best of my knowledge, no one from any Pangang Group or Pangang Group Titanium company knew about the existence of HK Titanium until December, 2012.
5. I directed the creation of the website www.pangang-titanium.com. This website is not affiliated with Pangang Group or Pangang Group Titanium or any affiliated company in any way. To the best of my knowledge, neither Pangang Group nor Pangang Group Titanium or any of their affiliated companies knew of this website until December, 2012 and had no input into the creation of that website or its contents. Attached hereto as Exhibit 2 is the domain name registration receipt of website www.pangang-titanium.com. Mr. Bin Zhu, whose name appears on the receipt, is my brother-in-law.
6. In fact, none of West Union, Tinox Chemical and HK Titanium is affiliated with Pangang Group or Pangang Group Titanium or any of their affiliated companies in any way. Neither Pangang Group or Pangang Group Titanium or any of their affiliated companies directed the formation of West Union, Tinox Chemical, or HK Titanium. No Pangang Group company has ever had any ownership interest in West Union, Tinox Chemical, or HK Titanium.
7. To the best of my knowledge, no one at Pangang Group or Pangang Group Titanium or any of their affiliated companies was aware of the creation of HK Titanium or Tinox, the website www.pangang-titanium.com, or our use of the email address bella@pangang-titanium.com.

8. I directed Ms. Zhou and Mr. Xie to attend a conference hosted by the Society of Plastics Engineers Color and Appearance in Louisville, Kentucky in October 2012 ("SPECA Conference"). Ms. Zhou attended the SPECA Conference in her capacity as a West Union employee and Mr. Xie attended the conference in his capacity as a Tinox Chemical representative. To my knowledge, neither Pangang Group or Pangang Group Titanium or any of their affiliated companies or employees had any knowledge of their attendance at this conference.
9. Mr. Xie told me he had received papers from the FBI. I did not know what the papers were. I did not tell anyone about these papers.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 23 day of January 2013 in Beijing, China.

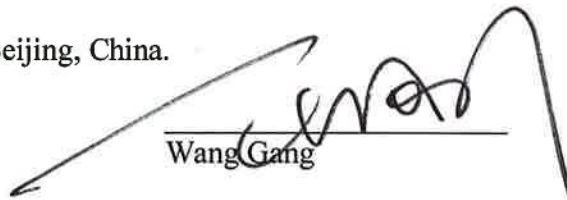

Wang Gang

EXHIBIT 1



No. 1549357

編號

STEPHEN. M. S. LAI & CO.
CERTIFIED PUBLIC ACCOUNTANTS
(Practising)

CERTIFICATE OF INCORPORATION

公司註冊證書

I hereby certify that

本人謹此證明

PANGANG TITANIUM INDUSTRY CO., LIMITED

is this day incorporated in Hong Kong under the Companies Ordinance

於本日根據《公司條例》(香港法例第32章)

(Chapter 32 of the Laws of Hong Kong) and that this company is limited.

在香港註冊成為有限公司。

Issued on 6 January 2011.

本證書於二〇一一年一月六日發出。

Ms Ada L L CHUNG

Registrar of Companies

Hong Kong

香港公司註冊處處長鍾麗玲

Note 註:

Registration of a company name with the Companies Registry does not confer any trade mark rights or any other intellectual property rights in respect of the company name or any part thereof.

公司名稱獲公司註冊處註冊，並不表示獲授予該公司名稱或其任何部分的商標權或任何其他知識產權。

Certified to be true and correct
[Signature]
STEPHEN, M. S. LAI & CO.
CERTIFIED PUBLIC ACCOUNTANTS
(Practising)

正本
ORIGINAL

表格 2
FORM 2
《商業登記條例》(第 310 章)
BUSINESS REGISTRATION ORDINANCE (Chapter 310)
《商業登記規例》
BUSINESS REGISTRATION REGULATIONS
商業/分行登記證
Business/Branch Registration Certificate

業務/法團所用名稱
Name of Business/
Corporation
PANGANG TITANIUM INDUSTRY CO., LIMITED

業務/分行名稱
Business/
Branch Name

地址
Address
FLAT/RM A5 15/F
HILLIER COMM BLDG
65-67 BONHAM STRAND EAST
SHEUNG WAN HK

業務性質
Nature of Business
TRADING

法律地位
Status
BODY CORPORATE

生效日期 Date of Commencement	屆滿日期 Date of Expiry	登記證號碼 Certificate No.	登記費及徵費 Fee and Levy
06/01/2011	05/01/2012	53580934-000-01-11-9	\$450 (登記費 FEE = \$ 0) (徵費 LEVY = \$450)

請注意下列《商業登記條例》的規定 (SEE OVERLEAF FOR ENGLISH VERSION)

- 第 6(6) 條規定就任何業務發出商業登記證或分行登記證，不得當作隱含以下意思：有關該業務或經營該業務的人或受僱於該業務的僱員的任何法律規定已獲遵從。
- 第 7(2) 條規定任何經營業務人士，倘在現有商業登記證期滿後未有收到繳款通知書，須於 1 個月內以書面通知稅務局局長。
- 第 8 條規定凡申請登記表格內所列業務詳情有任何變更時或凡某項業務經已結束，任何經營有關業務的人或任何在結束前經營該項業務的人須於該變更發生時或該項業務結束時起計 1 個月內，以書面通知局長。
- 第 12 條規定各業務須將其有效的商業登記證或有效的分行登記證於每一營業地點展示。
- 第 15(1) 條規定對觸犯本條例者可施行的罰則，包括罰款 \$5,000 及監禁 1 年。
- 第 21 條規定須將收取徵費所得的全部款項撥付破產欠薪保障基金。

繳款時請將此商業登記證及繳款通知書完整交出。在付款後，本繳款通知書方成為有效的商業登記證。
PLEASE PRODUCE THIS CERTIFICATE AND DEMAND NOTE INTACT AT TIME OF PAYMENT. THIS DEMAND NOTE WILL ONLY BECOME A VALID BUSINESS REGISTRATION CERTIFICATE UPON PAYMENT.

機印所示登記費及徵費收訖。(請參閱背頁繳款辦法所載內容)
RECEIVED FEE AND LEVY HERE STATED IN PRINTED FIGURES. (Please see payment instructions overleaf.)

#20201 07/01/11 56839152 432045 CHQ \$450.00 M



公司註冊處
Companies Registry

法團成立表格
(股份有限公司)
Incorporation Form
(Company Limited by Shares)

(《公司條例》第 14A 條)
(Companies Ordinance s. 14A)

表格
Form NC1

重要事項 Important Notes

- 填表前請參閱《填表須知》。
請用黑色墨水列印。
- Please read the accompanying notes before completing this form.
Please print in black ink.

Certified to be true and correct

STEPHEN M. S. LAI & CO.
CERTIFIED PUBLIC ACCOUNTANTS
(Practising)

(註 Note 7) **1 擬採用的公司名稱 Intended Company Name**

擬採用的公司英文名稱 Intended English Company Name

PANGANG TITANIUM INDUSTRY CO., LIMITED

擬採用的公司中文名稱 Intended Chinese Company Name

(註 Note 8) **2 公司類別 Type of Company**

請在適用的空格內加上 ✓ 號 Please tick the relevant box

私人 Private

非私人 Non-private

(註 Note 9) **3 公司在香港的註冊辦事處擬採用的地址**

The Intended Address of the Company's Registered Office in Hong Kong

Rm A, GCCD0396, 15/F Hillier Commercial Bldg
65-67 Bonham Strand East Sheung Wan Hong Kong

(「轉交」地址及郵政信箱號碼恕不接受 'Care of' addresses and post office box numbers are not acceptable)

(註 Note 10) **4 電郵地址 E-mail Address**

(註 Note 3) **提交人的資料 Presentor's Reference**

姓名 Name: Global-Fortune Irap Limited

地址 Address:

Flat A, 15/F Hillier Commercial Building
65-67 Bonham Strand East, Sheung Wan Hong Kong

電話 Tel:

傳真 Fax:

電郵地址 E-mail Address:

檔號 Reference:

指明編號 1/2008 (2008 年 7 月)
Specification No. 1/2008 (July 2008)

請勿填寫本欄 For Official Use

Acknowledgement
Companies Registry
H.K.

31/12/2010 16:10:21
Submission No/Seq No: 234212136/4
CR No:
Sh. Form. NC1

11) 5 股本 Share Capital

擬註冊股本 Share Capital to be Registered				創辦成員 共承購各類股份的 總面值 Total Nominal Value of Each Class of Shares to be Taken by Founder Member(s) †
股份類別 Class of Shares	股份數目 Number of Shares	每股的面值 Nominal Value of Each Share †	各類股份的總面值 Total Nominal Value of Each Class †	
	(a)	(b)	(a) x (b)	
Ordinary	10,000	HKD1	HKD 10,000	HKD 10,000
總值 Total			HKD 10,000	HKD 10,000

† 請註明貨幣單位(例如：港元、美元)
 Please specify the currency (e.g. HKD, USD)

(註 Note 12) 6

創辦成員 Founder Members

(如有超過兩名創辦成員，請用續頁A填報 Use Continuation Sheet A if more than 2 founder members)

1 中文姓名／名稱 Name in Chinese	朱小琴	
英文姓名／名稱 Name in English	ZHU XIAOQIN	
地址 Address	12F-F, DAYE BUILDING, NO.39, DAYE ROAD, JINJIANG DISTRICT, CHENGDU, SICHUAN, CHINA.	
承購的股份 Shares to be taken	Ordinary	7,000
	股份類別 Class of shares	股份數目 Number of shares
2 中文姓名／名稱 Name in Chinese	朱斌	
英文姓名／名稱 Name in English	ZHU BIN	
地址 Address	12F-F, DAYE BUILDING, NO.39, DAYE ROAD, JINJIANG DISTRICT, CHENGDU, SICHUAN, CHINA.	
承購的股份 Shares to be taken	Ordinary	3,000
	股份類別 Class of shares	股份數目 Number of shares

表格
Form

NC1

Note 13) 7

首任秘書 First Secretary

(如有超過一名個人或法人團體秘書，請用續頁 B 填報 Use Continuation Sheet B if more than 1 individual or corporate secretary)

A. 個人秘書 Individual Secretary中文姓名
Name in Chinese英文姓名
Name in English

姓氏 Surname

名字 Other Names

前用姓名/別名
Previous Names/Alias

前用姓名 Previous Names

別名 Alias

(註 Note 14)

香港住址
Hong Kong
Residential
Address

("轉交"地址及郵政信箱號碼恕不接受 'Care of' addresses and post office box numbers are not acceptable)

(註 Note 15)

電郵地址
E-mail Address

(註 Note 16)

身份證明 Identification

a 香港身份證號碼
Hong Kong Identity Card Numberb 護照
Passport

簽發國家 Issuing Country

號碼 Number

B. 法人團體秘書 Corporate Secretary

(註 Note 17)

中文名稱
Name in Chinese

(註 Note 17)

英文名稱
Name in English

(註 Note 18)

香港地址
Hong Kong
AddressFlat A, 15/F Hillier Commercial Building, 65-67 Bonham Strand East,
Sheung Wan, Hong Kong

("轉交"地址及郵政信箱號碼恕不接受 'Care of' addresses and post office box numbers are not acceptable)

(註 Note 15)

電郵地址
E-mail Address

公司編號 Company Number

(只適用於在香港註冊的法人團體)
(Only applicable to body corporate registered in Hong Kong)

EXHIBIT 2



RECEIPT

14455 North Hayden Road
Suite 219
Scottsdale, AZ 85260
(480) 505-8877

Date:	12/27/2010 at 6:06 PM
Receipt#:	293606532
Customer #:	40656588

Bill To:	Payment Information:
BIN ZHU Room 906, Building A, Renhe Spring Plaza Chengdu, Sichuan, 610072 008613982334433	BIN ZHU VISA #####1123 PAID: \$454.23

Item	List Price	Purchase Price	ICANN Fee	Discount	Total Price
.COM Domain Name Registration - 10 Years (recurring) Term: 10 Name: PANGANG-TITANIUM.COM Item number: 110-1 Quantity: 1	\$119.90	\$119.90	\$1.80	\$45.00	\$76.70
Private Registration Services Term: 1 Year(s) Name: PANGANG-TITANIUM.COM Item number: 7001-1 Quantity: 1 Manage your Domains By Proxy Account(s) by going to the "Domains By Proxy Accounts" page.	\$9.99	\$9.99	-	\$3.00	\$69.90
WebSite Tonight Premium - 999 Page Web Site w/Photo Album - 3 years (recurring) Term: 3 Period(s) Name: china-titanium.org Item number: 7516-1 Quantity: 1	\$374.04	\$287.64	-	-	\$287.64
Standard (Turbo) SSL (3 Years) (annual) Term: 3 Item number: 3606-1 Quantity: 1	\$152.97	-	-	-	-
Search Engine Visibility (annual) Term: 1 Year(s) Name: http://www.pangang-titanium.com/ Item number: 1401-1 Quantity: 1	\$29.99	\$29.99	-	\$10.00	\$19.99

Subtotal:	\$454.23
Shipping:	-
Tax:	-
Total:	\$454.23