

( S E R V E D )  
( JUNE 4, 2014 )  
(FEDERAL MARITIME COMMISSION)

FEDERAL MARITIME COMMISSION

---

**DOCKET NO. 14 - 05**

---

**HUNTINGTON INTERNATIONAL, INC.,  
JC HORIZON LTD., AND JUDY LEE –  
POSSIBLE VIOLATIONS OF SECTIONS 10(a)(1) AND 19  
OF THE SHIPPING ACT**

---

**ORDER OF INVESTIGATION AND HEARING**

---

The Federal Maritime Commission (Commission) deems it appropriate and in the public interest that a proceeding be, and hereby is, instituted pursuant to section 11 of the Shipping Act of 1984 (Shipping Act), 46 U.S.C. § 41302, against respondents Huntington International, Inc., previously doing business as a licensed and bonded ocean freight forwarder for possible violations of sections 10(a)(1) and 19 of the Shipping Act, 46 U.S.C. §§ 41102(a), 40901, 40902, and 40904, and the Commission's regulations at 46 C.F.R. Part 515; and JC Horizon Ltd., a shipper of property, and Judy Lee, its owner, for possible violations of section 10(a)(1) of the Shipping Act.

Based on information provided to it, the Commission's Bureau of Enforcement makes the following allegations:

**STATEMENT OF FACTS  
CONSTITUTING BASIS OF VIOLATIONS**

1. Huntington International, Inc. was incorporated in California on June 24, 2008, with offices at 411 E. Huntington Drive, Suite 312, Arcadia, CA 91006.
2. From July 2, 2009 through June 22, 2011, respondent Huntington International, Inc. (Huntington) operated as a licensed and bonded ocean transportation intermediary (OTI), providing service as an ocean freight forwarder and a non-vessel-operating common carrier (NVOCC).
3. The Commission's licensing records identify Kathy Lu as the Qualified Individual (QI) of Huntington.
4. On information and belief, Kathy Lu resigned from Huntington in September, 2010.
5. Commission records indicate that Huntington failed to replace its QI subsequent to September 2010. See 46 C.F.R. §515.18 (c).
6. The Commission's licensing file and Regulated Persons Index (RPI) identify respondent Judy Lee as the Chief Financial Officer and a Director of Huntington.
7. Huntington maintained a freight forwarder bond in the amount of \$50,000 with Nova Casualty Company, Buffalo, NY, and a NVOCC bond in the amount of \$75,000, with the same surety.
8. Huntington's bonds were cancelled and its license revoked, effective June 22, 2011.
9. Huntington's corporate powers are currently suspended by the state of California.
10. Respondent JC Horizon Ltd. (JC Horizon) is a California corporation engaged in the purchase and sale of scrap metal, waste paper, and plastic scrap for export from the United States to foreign destinations.
11. JC Horizon maintains offices at 411 E. Huntington Drive, Suite 311, Arcadia, CA 91006.

12. JC Horizon utilizes ocean common carriers for transportation of its shipments from the United States to foreign destinations.
13. Respondent Judy Lee is and has been the sole shareholder, President, and Chief Executive Officer of JC Horizon since its incorporation in 1996.
14. On information and belief, respondent Judy Lee is President of JC Horizon Trading Ltd. (JC Horizon Trading), a company located at 498-555 W. 12<sup>th</sup> Ave., Vancouver, BC.
15. On information and belief, JC Horizon Trading is engaged as an exporter of scrap materials.
16. On information and belief, JC Horizon Trading sometimes uses the California address of JC Horizon as its address in conducting business.
17. On information and belief, respondent Judy Lee exercises control of a company named Zhong Bing International, Inc. (Zhong Bing).
18. Zhong Bing is a California corporation incorporated in 2001.
19. According to records in the Commission's SERVCON database, Zhong Bing is identified as a shipper and exporter of scrap materials in several service contracts prior to 2009.
20. According to records in the Commission's SERVCON database, Zhong Bing is identified as an affiliate of JC Horizon in several service contracts prior to 2009.
21. Zhong Bing maintains a bank account with East West Bank, located in El Monte, California, over which respondent Judy Lee has control and authority to draw checks on that account.
22. East West Bank's records reflect Zhong Bing's address as the same as JC Horizon.
23. Zhong Bing's corporate powers are currently suspended by the state of California.
24. On information and belief, Zhong Bing is not engaged in commercial or shipping business activity and has not conducted business since at least January 1, 2009.

**Unlicensed Activities of Huntington International, Inc.**

25. On information and belief, Huntington received notice of termination of Huntington's OTI bonds, effective June 22, 2011.
26. On information and belief, Huntington received notice of revocation of Huntington's OTI license, effective June 22, 2011.
27. On information and belief, Huntington received a copy of the Commission's Order of Revocation of Huntington's OTI license, served July 7, 2011.
28. With respect to at least 32 shipments between September 9, 2011, and December 24, 2011, identified in Attachment A hereto, Huntington acted as an ocean freight forwarder by providing freight forwarder services without a license and without filing evidence of financial responsibility with the Commission.
29. In each of the 32 instances identified in Attachment A, Huntington knew that a license and an effective bond were required in order to provide freight forwarder services.
30. In each of the 32 instances identified in Attachment A, Huntington knowingly and willfully conducted unlicensed operations.
31. Between July 1, 2011 and December 31, 2011, Huntington acted as ocean freight forwarder on over 600 shipments transported by China Shipping Container Lines for shipper JC Horizon, including booking or securing space for those shipments and processing export documentation or performing related activities.
32. Between July 1, 2011 and December 31, 2011, Huntington acted as ocean freight forwarder on over 300 shipments transported by Evergreen Line for JC Horizon, including booking or securing space for those shipments and processing export documentation or performing related activities.

33. On information and belief, Huntington acted as an ocean freight forwarder without a license or evidence of financial responsibility on over 1,800 shipments between July 1, 2011 and February 27, 2012, for which an OTI license and bond was required.

**Unlawful Collection of Forwarder Compensation by Huntington International, Inc.**

34. With respect to each of the 100 shipments identified in Attachment B hereto, JC Horizon was identified as the shipper on the ocean carrier bill of lading and was responsible for payment of the ocean freight charges.

35. With respect to each of the 100 shipments identified in Attachment B, respondent Judy Lee had a beneficial interest in the shipments as defined in the Commission's regulations by virtue of her ownership of JC Horizon.

36. On the dates of the shipments identified in Attachment B, Huntington was licensed by the Commission as an ocean freight forwarder.

37. On the dates of the shipments identified in Attachment B, respondent Judy Lee was the Chief Financial Officer and a Director of Huntington.

38. On information and belief, Huntington invoiced the ocean carrier for the payment of freight forwarder compensation for each of the 100 shipments identified in Attachment B hereto.

39. On information and belief, Huntington provided a certification to the ocean carrier that Huntington was eligible for the payment of freight forwarder compensation for each of the 100 shipments identified in Attachment B hereto.

40. By virtue of her ownership and control of JC Horizon, Judy Lee, an officer and director of Huntington, had a beneficial interest in all shipments made on behalf of JC Horizon.

41. By virtue of her ownership and control of JC Horizon, Judy Lee, an officer and director of Huntington, knew or had reason to know that Huntington had a beneficial interest in all

shipments made on behalf of JC Horizon.

42. By virtue of her ownership and control of JC Horizon, Judy Lee, an officer and director of Huntington, knew or had reason to know that Huntington's certification to the ocean carrier that Huntington was eligible for the payment of freight forwarder compensation was materially false.
43. For each of the 100 shipments identified in Attachment B hereto, Huntington collected freight forwarder compensation from the ocean carrier that performed the ocean transportation on JC Horizon shipments.
44. On information and belief, Huntington collected freight forwarder compensation on JC Horizon on shipments in addition to those listed in Attachment B.

**Unlawful Sharing of Forwarder Compensation by Huntington International, Inc.**

45. With respect to at least 132 shipments identified in Attachments A and B, Huntington collected freight forwarder compensation from ocean common carriers that transported those shipments for JC Horizon.
46. Between February, 2010 and February, 2011, Huntington paid over to JC Horizon and/or companies over which Judy Lee exercised control in excess of \$575,000, as more particularly identified in Attachment C.
47. On information and belief, Huntington's payments to JC Horizon and/or companies controlled by Judy Lee were derived in whole or in part from freight forwarder compensation or fees collected from ocean common carriers.
48. At the times of payments identified in Attachment C, JC Horizon and JC Horizon Trading were shippers, and Judy Lee had a beneficial interest in shipments transported for JC Horizon and JC Horizon Trading.

**Obtaining Transportation at Less Than Applicable Rates by JC Horizon and Judy Lee**

49. With respect to at least 132 shipments identified in Attachments A and B, JC Horizon or JC Horizon Trading was identified as the shipper on the ocean carrier bill of lading and responsible for payment of ocean transportation charges.
50. With respect to at least 132 instances identified in Attachments A and B, Huntington provided freight forwarder services, and invoiced and received freight forwarder compensation from the ocean carriers that transported the shipments.
51. On at least 9 occasions between February 23, 2010 and February 9, 2011, identified in Attachment C hereto, Huntington transferred funds from its bank account in the amounts, on the dates, and to the recipients identified in Attachment C.
52. On information and belief, freight forwarder compensation and fees collected by Huntington between July, 2009 and February, 2012, on JC Horizon shipments were deposited in the same bank account from which Huntington made the payments identified in Attachment C.
53. On information and belief, the payments identified in Attachment C were made at the direction of Judy Lee.
54. On information and belief, the payments identified in Attachment C were derived from freight forwarder compensation collected by Huntington on shipments transported for JC Horizon or JC Horizon Trading.
55. The funds totaling \$200,000 represented by two payments to Zhong Bing identified in Attachment C were distributed to JC Horizon within a day after funds were deposited in Zhong Bing's bank account.
56. Respondent Judy Lee, by virtue of her control over Zhong Bing, a shipper affiliated with JC Horizon, utilized Zhong Bing as a means to knowingly and willfully obtain ocean transportation

at less than the rates or charges otherwise applicable to shipments by JC Horizon and JC Horizon Trading, by directing payment of funds derived from freight forwarder compensation back to companies owned by Judy Lee.

57. Respondent Judy Lee, by virtue of her control over Huntington, an affiliated freight forwarder, utilized Huntington as a means to knowingly and willfully obtain ocean transportation at less than the rates or charges otherwise applicable to shipments by JC Horizon and JC Horizon Trading, by directing payment of funds derived from freight forwarder compensation back to companies owned by Judy Lee.

**THE COMMISSION'S JURISDICTION  
AND REQUIREMENTS OF LAW**

58. Section 10(a)(1) of the Shipping Act, 46 U.S.C. § 41102(a), prohibits any person from knowingly and willfully, directly or indirectly, by means of false billing, false classification, false weighing, false report of weight, false measurement, or by any other unjust or unfair device or means, obtaining or attempting to obtain ocean transportation for property at less than the rates or charges that would otherwise be applicable.
59. Section 19(a) and (b) of the Shipping Act, 46 U.S.C. §§ 40901, 40902, prohibits any person from acting as an OTI without a license and without filing evidence of financial responsibility with the Commission.
60. Section 19(e) of the Shipping Act, 46 U.S.C. § 40904, and the Commission's regulations, 46 C.F.R. §515.42, prohibit a licensed forwarder from receiving compensation on a shipment in which it, or an affiliate, officer or director has a beneficial interest.
61. The Commission's regulations, 46 C.F.R. §515.41, prohibit a licensed forwarder from sharing, directly or indirectly, compensation or freight forwarding fees with a shipper or with any person having a beneficial interest in the shipment.

62. The Commission's regulations, 46 C.F.R. §515.42, require a licensed forwarder to provide a certification to the ocean carrier that the forwarder is entitled to receive compensation, and that no officer, director, agent or executive of the licensee has a beneficial interest in the shipment.
63. The activities of Respondents described above were provided as part of and in connection with transportation by water of cargo between the United States and a foreign country for compensation over which the Commission has jurisdiction.
64. Under 46 U.S.C. § 41302(a), the Commission is empowered to investigate any conduct or agreement that the Commission believes may be in violation of the Shipping Act.
65. The Commission may, after notice and opportunity for hearing, issue an order relating to any violation of the Shipping Act, including assessment of a civil penalty. 46 U.S.C. § 41304.

**VIOLATIONS OF THE SHIPPING ACT  
AND COMMISSION REGULATIONS**

66. It is alleged that Huntington acted as a freight forwarder without a license and without filing evidence of financial responsibility with the Commission with respect to at least 32 shipments identified in Attachment A, in violation of section 19(a) and (b) of the Shipping Act.
67. It is alleged that Huntington collected freight forwarder compensation from ocean common carriers on shipments in which its Chief Financial Officer and Director had a beneficial interest with respect to at least 132 shipments identified in Attachments A and B, in violation of section 19(e) of the Shipping Act and the Commission's regulations, 46 C.F.R. §515.42(i).
68. It is alleged that Huntington shared compensation or freight forwarding fees with JC Horizon, a shipper, and/or Judy Lee, a person having a beneficial interest with respect to at least 132 shipments identified in Attachments A and B, in violation of section 10(a)(1) of the Shipping Act and the Commission's regulations, 46 C.F.R. §515.41(a).

69. It is alleged that JC Horizon and Judy Lee, its sole shareholder and CEO, knowingly and willfully, directly or indirectly, obtained ocean transportation at less than the applicable rates and charges by the device or means of receiving payments identified in Attachment C that were derived from freight forwarder compensation collected from ocean common carriers on shipments transported for JC Horizon, including those identified in Attachments A and B, in violation of section 10(a)(1) of the Shipping Act.

### **ORDER**

NOW THEREFORE, IT IS ORDERED, That pursuant to sections 11 and 14 of the Shipping Act, 46 U.S.C. §§ 41302 and 41304, an investigation is instituted to determine: (1) whether Huntington International, Inc. violated (a) section 10 (a)(1) of the Shipping Act, 46 U.S.C. § 41102(a), and the Commission's regulations, 46 C.F.R. §515.41(a), by knowingly and willfully sharing compensation or freight forwarding fees with a shipper, thereby providing the means through which the shipper obtained transportation at less than the rates and charges otherwise applicable; (b) sections 19(a) and (b) of the Shipping Act, 46 U.S.C. §§ 40901, 40902, by acting as an ocean freight forwarder without a license and without filing evidence of financial responsibility; (c) section 19(e) of the Shipping Act, 46 U.S.C. § 40904, and the Commission's regulations, 46 C.F.R. §515.42, by collecting freight forwarder compensation for shipments in which the company's Chief Financial Officer and Director had a beneficial interest; (2) whether JC Horizon Ltd. and Judy Lee, an individual, violated section 10(a)(1) of the Shipping Act, by knowingly and willfully directing Huntington International, Inc., an ocean freight forwarder, to transfer monies derived from freight forwarder compensation collected from ocean carriers on shipments of JC Horizon, or other companies controlled by Judy Lee, and thereby obtaining

ocean transportation at less than the applicable rates and charges; and (3) whether, in the event violations of the Shipping Act or the Commission's regulations are found, civil penalties should be assessed against Huntington International, Inc., JC Horizon Ltd., and/or Judy Lee, and, if so, the amount of the penalties to be assessed, and also whether appropriate cease and desist orders should be entered;

IT IS FURTHER ORDERED, That Huntington International, Inc., JC Horizon Ltd., and Judy Lee are designated Respondents in this proceeding;

IT IS FURTHER ORDERED, That the Commission's Bureau of Enforcement is made a party to this proceeding;

IT IS FURTHER ORDERED, That by July 7, 2014, Respondents must file with the Commission and serve upon the Bureau of Enforcement an Answer to the allegations in this Order, in accordance with the requirements of the Commission's regulations set forth in 46 C.F.R. § 502.63(c). Respondents' answers must be verified and admit or deny all allegations in this Order. Allegations not denied shall be deemed admitted;

IT IS FURTHER ORDERED, That this matter be assigned for hearing before an Administrative Law Judge of the Commission's Office of Administrative Law Judges at a date and place to be determined by the Administrative Law Judge in compliance with Rule 61 of the Commission's Rules of Practice and Procedure, 46 C.F.R. § 502.61. This hearing shall include oral testimony and cross-examination in the discretion of the presiding Administrative Law Judge only after consideration has been given by the parties and the presiding Administrative Law Judge to the use of alternative forms of dispute resolution, and upon a proper showing that there are genuine issues of material fact that cannot be resolved on the basis of sworn statements, affidavits, depositions, or other documents or that the nature of the matters in issue is such that

an oral hearing and cross-examination are necessary for the development of an adequate record;

IT IS FURTHER ORDERED, That failure of a Respondent to timely file an answer to this Order may be deemed to constitute default by that Respondent and authorize the presiding Administrative Law Judge, without further notice to Respondent, to find the facts to be as alleged and to enter a decision containing appropriate findings, conclusions, and an order;

IT IS FURTHER ORDERED, That other persons having an interest in participating in this proceeding may file motions for leave to intervene in accordance with Rule 68 of the Commission's Rules of Practice and Procedure, 46 C.F.R. § 502.68;

IT IS FURTHER ORDERED, That all further notices, orders, and/or decisions issued by or on behalf of the Commission in this proceeding, including notice of the time and place of hearing or prehearing conference, shall be served on the parties of record;

IT IS FURTHER ORDERED, That all documents filed by any party of record in this proceeding shall be directed to the Secretary, Federal Maritime Commission, Washington, D.C. 20573, in accordance with Rule 2 of the Commission's Rules of Practice and Procedure, 46 C.F.R. § 502.2, and shall be served on the parties of record; and

IT IS FURTHER ORDERED, That in accordance with Rule 61 of the Commission's Rules of Practice and Procedure, 46 C.F.R. § 502.61, the initial decision of the Administrative Law Judge shall be issued by June 5, 2015 and the final decision of the Commission shall be issued by October 5, 2015.

By the Commission.

Karen Gregory  
Secretary

**ATTACHMENT A**

**Shipments For Which Huntington Acted As An OTI After License Revocation**

**Shipments of Plastic Scrap Transported by China Shipping Container Lines**

<b><u>China Shipping Bill of Lading</u></b>	<b><u>FF Compensation To Huntington</u></b>	<b><u>Shipment Date</u></b>
MIASHA001035	\$9.38	9/9/2011
NYCSHA002873	\$9.38	9/12/2011
NYCSHA002872	\$18.75	9/19/2011
NYCSHA002870	\$28.13	9/19/2011
ORFSHA000807	\$9.38	9/20/2011
ORFSHA000808	\$9.38	9/20/2011
ORFSHA000814	\$18.75	9/25/2011
NYCSHA002884	\$9.38	9/26/2011
NYCSHA002885	\$28.13	9/26/2011
NYCSHA002896	\$9.38	10/3/2011
NYCSHA002897	\$9.38	10/3/2011
NYCSHA002899	\$28.13	10/3/2011
NYCSHA002903	\$18.75	10/3/2011
NYCSHA002911	\$37.50	10/10/2011
NYCSHA002912	\$9.38	10/10/2011
NYCSHA002902	\$9.38	10/10/2011
MIASHA001047	\$28.13	10/15/2011
NYCSHA002918	\$37.50	10/17/2011
ORFSHA000827	\$18.75	10/17/2011
MIASHA000307	\$9.38	10/21/2011
MIASHA001048	\$18.75	10/21/2011
ORFSHA000842	\$37.50	10/23/2011
NYCSHA002922	\$56.25	10/24/2011
MIASHA001050	\$28.13	10/27/2011
NYCSHA002936	\$18.75	11/7/2011
ORFSHA000861	\$10.00	12/5/2011
MIASHA001060	\$50.00	12/9/2011
ORFSHA000863	\$20.00	12/11/2011
NYCSHA002952	\$30.00	12/12/2011
MIAXMN000313	\$10.00	12/15/2011
ORFSHA000866	\$20.00	12/19/2011
MIAXMN00314	\$40.00	12/24/2011

**ATTACHMENT B****Evergreen Shipments of Plastic Scrap for JC Horizon or JC Horizon Trading  
For Which Huntington Collected FF Compensation**

<b>Evergreen B/L</b>	<b>FF Compensation</b>	<b>Shipment Date</b>
400942027014	31.53	1/4/2010
415010003171	13.00	1/5/2010
415010007362	13.00	1/11/2010
415010008032	25.90	1/16/2010
400942141372	26.00	1/18/2010
415010003065	27.60	1/18/2010
415010016426	26.00	1/18/2010
415010004835	26.00	1/20/2010
415010009977	39.00	1/20/2010
415010010207	13.00	1/25/2010
415010004860	13.00	1/27/2010
415010022311	26.00	1/27/2010
415010035501	26.00	2/10/2010
415010013575	26.00	2/10/2010
415010020792	38.85	2/12/2010
400041372455	63.05	2/13/2010
415010028688	13.00	2/15/2010
415010020075	64.75	2/17/2010
405241390962	50.00	2/17/2010
415010013591	13.00	2/17/2010
415010034025	12.95	2/17/2010
400041420051	31.53	2/19/2010
415010028734	31.00	2/22/2010
415010031344	9.20	2/23/2010
415010019573	26.00	2/25/2010
415010033843	30.90	3/2/2010
415010032375	11.70	3/3/2010
415010020920	77.50	3/3/2010
415010049201	77.25	3/15/2010

415010049243	77.50	3/24/2010
415010060867	77.25	4/2/2010
415010042303	46.50	4/5/2010
415010093960	46.35	4/8/2010
415010076607	91.80	4/14/2010
415010062002	23.00	4/26/2010
415010097019	45.90	4/22/2010
400041573795	90.00	4/28/2010
415010116765	22.95	4/30/2010
415010071605	115.00	5/3/2010
415010072890	46.00	5/5/2010
415010071630	45.90	5/9/2010
415010071613	23.00	5/10/2010
400041629235	47.50	5/13/2010
415010158280	35.00	6/2/2010
415010157020	69.00	6/3/2010
415010094974	115.00	6/7/2010
400041636746	145.50	6/8/2010
415010148322	115.00	6/8/2010
415010156872	69.00	6/12/2010
415010156881	230.00	6/19/2010
415010169061	138.00	6/26/2020
415010177411	207.00	6/26/2010
415010169079	92.00	7/3/2010
415010185937	92.00	7/5/2010
415010183781	20.05	7/10/2010
415010188146	52.50	7/11/2010
415010185945	23.00	7/19/2010
400042245961	46.25	11/9/2010
400141673048	20.00	5/4/2011
400141723225	38.75	6/2/2011
446141786004	20.00	6/15/2011

**China Shipping Shipments of Plastic Scrap for JC Horizon  
For Which Huntington Collected FF Compensation**

<b>China Shipping B/L</b>	<b>FF Compensation</b>	<b>Shipment Date</b>
OAKXMN000021	21.88	12/02/09
OAKXMN000022	4.38	12/02/09
LAXXMN000319	37.50	12/21/09
LAXSHA007322	18.75	12/23/09
OAKXMN000025	6.88	12/23/09
OAKHKG001638	6.88	12/23/09
OAKSHA000790	13.75	12/26/09
OAKSHA000793	13.75	12/26/09
LAXSHA007363	18.75	12/30/09
LAXHKG009408	20.63	01/05/10
LAXXMN000320	17.50	01/05/10
LAXXMN000329	37.50	01/12/10
LAXXMN000331	35.00	01/12/10
LAXXMN000324	35.00	01/12/10
OAKHKG001663	27.50	01/13/10
LAXXMN000334	56.25	01/25/10
LAXXMN000335	40.00	01/25/10
LAXSHA007421	18.75	01/28/10
SEASHA001811	22.50	11/02/10
LAXTAO003617	281.25	11/12/10
OAKSHA000986	20.63	11/23/10
LAXSHA008876	16.88	12/15/10
SEAGNS000660	893.75	12/23/10
OAKSHA001009	27.50	12/25/10
SEAGNS000665	371.25	12/28/10
OAKSHA001015	13.75	12/31/10
SEAGNS000669	371.25	01/08/11
LAXTAO003895	91.88	01/08/11
LAXTAO003914	976.25	01/08/11
SEAGNS000673	41.25	01/12/11
SEAGNS000674	41.25	01/12/11
LAXTAO003923	137.50	01/12/11
OAKSHA001021	13.75	01/14/11
LAXSHA009036	11.25	01/20/11
SEAGNS000678	123.75	01/21/11
SEAGNS000681	302.50	01/21/11
OAKSHA001028	41.25	01/22/11

SEAGNS000685	123.75	01/31/11
SEASHA001930	30.00	01/31/11

**ATTACHMENT C**

**PAYMENTS TO JC HORIZON AND RELATED COMPANIES**

<b><u>DATE OF PAYMENT</u></b>	<b><u>DESCRIPTION OF PAYMENT AND PAYEE</u></b>	<b><u>AMOUNT OF PAYMENT</u></b>
2/23/2010	Huntington check to JC Horizon	\$100,000
6/18/2010	Huntington check to JC Horizon	\$50,000
7/12/2010	Huntington check to JC Horizon	\$100,000
7/22/2010	Huntington check to Zhong Bing	\$100,000
8/02/2010	Huntington wire to JC Horizon Trading	\$15,527
11/15/2010	Huntington wire to JC Horizon	\$50,000
12/17/2010	Huntington check to JC Horizon	\$9,800
1/10/2011	Huntington check to Zhong Bing	\$100,000
2/09/2011	Huntington check to JC Horizon	\$50,000
	<b>TOTAL</b>	<b>\$575,327</b>