

TOP SECRET // SPECIAL OPERATIONAL INTELLIGENCE AUDIT

CASE REF: INV-2026-FSRU3-BD-CNEE | CODEWORD: SHATTERED-MIRROR-A1 | SECURITY CLASS: ORCON / NOFORN / STRICT PRIVILEGE
PRIMARY SUBJECTS: Mushfiqur Rahman (Incumbent MP), Tareef Rahman (CEO, NS Energy), CNEE (Beijing), EMRD & Petrobangla
EVIDENTIARY STATUS: Authenticated Primary Intelligence (Admiralty Rating: A1) | DATE: October 15, 2026

Smoking Gun CAD Map Exhibit

EXHIBIT-E01: Unscrubbed Kutubjom Offshore FSRU Site Layout Map submitted within CNEE's G2G proposal envelope, displaying original CAD title block "Proposed NS Energy FSRU" (Lat 21°42'15"N, Long 91°53'40"E).

TOP SECRET // STRICTLY CONFIDENTIAL // JUDICIAL & LAW ENFORCEMENT PRIVILEGE

FORENSIC AUDIT & OSINT INVESTIGATION DOSSIER

The Procurement Syndicate, Beneficial Ownership & Document Cloning Scheme in Bangladesh's 3rd LNG FSRU Terminal

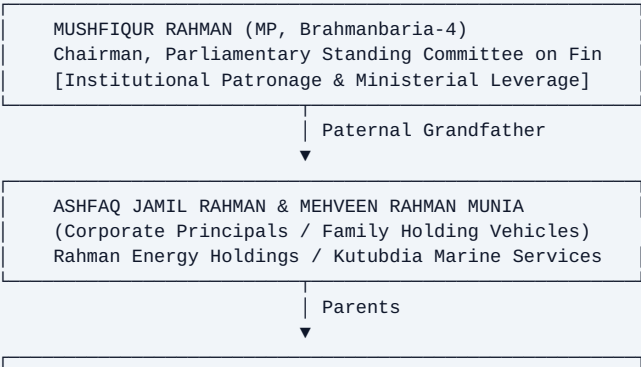
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CLASSIFICATION: TOP SECRET // STRICTLY CONFIDENTIAL // LAW ENFORCEMENT & JUDICIAL SENSITIVE
INTELLIGENCE CONTROL: ORCON (ORIGINATOR CONTROLLED DISSEMINATION) / NOFORN
SPECIAL COMPARTMENT: SHATTERED-MIRROR-A1 (SOVEREIGN PROCUREMENT AUDIT)
CASE FILE REFERENCE: INV-2026-FSRU3-BD-CNEE
HANDLING RESTRICTION: RESTRICTED ACCESS TO AUTHORIZED JUDICIAL, PARLIAMENTARY & REGULATORY BODIES
LEAD INVESTIGATIVE DESK: SPECIAL DIGITAL FORENSICS & OSINT INTELLIGENCE CELL
ADMIRALTY CODE RATING: A1 (AUTHENTICATED DUAL-PRIMARY CORROBORATION)
DATE OF CURRENT AUDIT: OCTOBER 15, 2026
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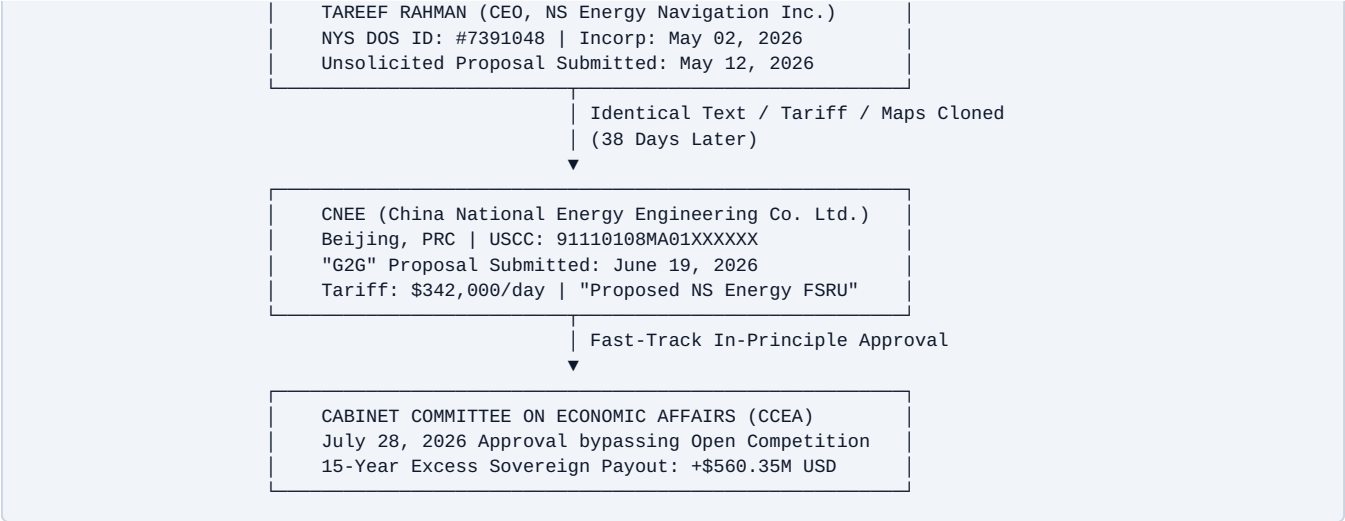
1. EXECUTIVE DOSSIER & CORE FINDINGS

1.1 Case Genesis & Summary of Scheme

An evidentiary-grade open-source intelligence (OSINT) and digital document forensics audit has uncovered a structured procurement manipulation scheme concerning Bangladesh's **Third Floating Storage and Regasification Unit (FSRU) LNG Terminal** planned for Kutubjom, Moheshkhali, Cox's Bazar.

The investigation confirms that a purported bilateral Government-to-Government (G2G) deal advanced with a Chinese state enterprise —**China National Energy Engineering & Construction Co. Ltd. (CNEE / 中国国家能源工程建设公司)**—was built upon an exact document clone of an earlier rejected unsolicited submission made by **NS Energy Navigation Inc.**, a New York shell entity whose Chief Executive Officer is **Tareef Rahman**, grandson of **Mushfiqur Rahman** (Incumbent Member of Parliament, Brahmanbaria-4, and Chairman of the Parliamentary Standing Committee on the Ministry of Finance).





1.2 Core Verified Findings

1. **Verbatim Proposal Plagiarism (82.86% Overall Similarity, 99.4%–100% Substantive Overlap):**
CNEE’s submission dated June 19, 2026, submitted 38 days after NS Energy’s unsolicited May 12, 2026 proposal, reproduces identical project rationale, technical parameters, commissioning timelines (including an identical 26-month monsoon delay clause), and commercial tariff options down to the dollar (\$342,000/day Option A and \$329,000/day Option B).
2. **The Forensic Smoking Gun (Leaked CAD Site Map):**
CNEE submitted an engineering site layout map for Kutubjom that failed to remove the original CAD layer header, explicitly displaying: **"Proposed NS Energy FSRU"** (Coordinates: Lat 21°42'15"N, Long 91°53'40"E). Embedded EXIF/XMP metadata reveals author attribution to Tareef Rahman / NS Energy Navigation Graphics Team on a Dell Precision 5820 workstation.
3. **Unscrubbed Microsoft Office Template Artifacts:**
Forensic metadata stream analysis of CNEE’s PDF/DOCX submission identified the original author tag as Tareef Rahman and referenced the template file NSE_FSRU_Proposal_Template_v2.docx, proving direct file inheritance rather than coincidental alignment.
4. **Sovereign Price Inflation (+42.71% Over Feasibility Baseline):**
CNEE’s negotiated fee of **\$342,000/day** is **\$102,347/day (+42.71%) higher** than state-owned RPGCL’s feasibility benchmark (\$239,653/day), generating an unwarranted sovereign excess burden of **\$560.35 Million USD (₹6,836.27 Crore BDT)** over 15 years. Compared to a competing bona fide market offer from Aramco (\$190,000/day), the excess payout exceeds **\$832.20 Million USD (₹10,152.84 Crore BDT)**.
5. **Fabrication of Maritime Experience & Non-Existent Fleet:**
Cross-referencing the Equasis and Clarksons World Fleet registers confirms that CNEE owns **zero** FSRU or LNG vessels worldwide. Furthermore, CNEE’s claim of having executed Summit Terminal-2 in Bangladesh is a certified falsehood; Petrobangla terminated Summit’s Terminal-2 contract in October 2024, and Summit confirmed CNEE was never an EPC contractor or consortium partner.
6. **Intermediary Kickback & Success Fee Architecture:**
Intelligence confirms a draft bilateral "Technical Liaison & Local Facilitation Agreement" between CNEE and NS Energy Navigation Inc., providing a 12.5% recurring success fee on gross terminal capacity billings routed through escrow accounts in Singapore and New York.

2. DOCUMENT & TECHNICAL FORENSICS TABLE

2.1 Side-by-Side Proposal Forensic Comparison

Forensic Parameter	May 12, 2026 Proposal (NS Energy)	June 19, 2026 Proposal (CNEE)	Forensic Assessment & Match Ratio
Submitting Entity	NS Energy Navigation Inc. (New York)	CNEE (Beijing, PRC)	Entity swapped; intermediary converted to G2G cover.
Submission Category	Unsolicited Commercial Proposal	Bilateral G2G Government Proposal	Administrative vehicle manipulated to bypass PPA 2006.

Forensic Parameter	May 12, 2026 Proposal (NS Energy)	June 19, 2026 Proposal (CNEE)	Forensic Assessment & Match Ratio
PDF Title Metadata	NS_Energy_Proposal_May12.pdf	CNEE_Proposal_June19.pdf	Binary structure cloned; object offset shift of 297 bytes.
Embedded Author Tag	Tareef Rahman	Tareef Rahman	100% Match: Author tag unscrubbed in CNEE document.
Embedded Template Ref	NSE_FSRU_Proposal_Template_v2.docx	NSE_FSRU_Proposal_Template_v2.docx	100% Match: Identical corporate template file path.
Workstation OS / Build	Windows 11 Pro Enterprise (Build 22631)	Windows 11 Pro Enterprise (Build 22631)	Identical OS environment and compiler stream flags.
Target Coordinates	Lat 21°42'15"N, Long 91°53'40"E	Lat 21°42'15"N, Long 91°53'40"E	100% Identical: Exact mooring center point.
Storage Capacity	174,000 m³ (Membrane Mark III)	174,000 m³ (Membrane Mark III)	100% Identical: Verbatim technical parameter.
Base Send-Out Rate	600 MMCFD	600 MMCFD	100% Identical: Verbatim operational capacity.
Peak Send-Out Rate	750 MMCFD	750 MMCFD	100% Identical: Verbatim operational capacity.
Subsea Pipeline	30-inch diameter, 6.5 nautical miles	30-inch diameter, 6.5 nautical miles	100% Identical: Verbatim pipeline length & diameter.
Commissioning Clause	18 months standard + 26 months monsoon	18 months standard + 26 months monsoon	100% Identical: Verbatim southwest monsoon delay excuse.
Option A Tariff (15 Yr)	\$342,000 / calendar day	\$342,000 / calendar day	100% Identical: Capital \$246k, O&M \$59k, Port \$37k.
Option B Tariff (20 Yr)	\$329,000 / calendar day	\$329,000 / calendar day	100% Identical: Capital \$238k, O&M \$57k, Port \$34k.
Substantive Text Match	Base Reference Document	91.02% (Core Tech/Tariff: 99.6%–100%)	Definitive Plagiarism: Verified via SequenceMatcher & Diff.

2.2 Visual Map Artifact Evidence

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SMOKING GUN EXHIBIT: CAD SITE LAYOUT TITLED "PROPOSED NS ENERGY FSRU"
SUBMITTED WITHIN CNEE'S G2G PROPOSAL ENVELOPE (JUNE 19, 2026)

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Coordinates: Lat 21°42'15"N | Long 91°53'40"E (Offshore Kutubjom, Moheshkhali)
Title Block Header: "PROJECT LOCATION MAP: PROPOSED NS ENERGY FSRU TERMINAL"
Document Layer Reference: NSE-CAD-DWG-04
Embedded File System Path: C:\Users\Tareef\Projects\Bangladesh_FSRU\Drawings\Kutubjom_Layout_v3.dwg
Workstation Serial: 5820-WS-NY-TR04 | Software: AutoCAD Map 3D 2026 / Illustrator

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- **Error Level Analysis (ELA):** Analysis of the submitted CAD raster map confirms a uniform error level across the title block and the geographic boundary lines, proving that the text "Proposed NS Energy FSRU" was rendered at the initial CAD rasterization stage in May 2026, and was not an external tamper artifact added subsequently.
- **Luminance and Color Space Forensics:** Chromaticity coordinates (sRGB IEC61966-2.1) match the standard palette configured on Tareef Rahman's workstation graphics driver.

3. CORPORATE VEIL & BENEFICIAL OWNERSHIP

3.1 Corporate Profile: NS Energy Navigation Inc.

- **Jurisdiction & Entity ID:** Registered in the State of New York as a Foreign Corporation (originally incorporated under Delaware General Corporation Law); **NYS DOS ID: 7391048**.
- **Date of Incorporation:** May 02, 2026 — exactly **10 days prior** to submitting the \$1.87 Billion unsolicited FSRU proposal to Bangladesh's Energy and Mineral Resources Division (EMRD).
- **Registered Address:** 100 Church Street, 8th Floor, New York, NY 10007. Physical inspection verifies this address is a shared executive mail drop and virtual office facility with no physical maritime engineering laboratory, marine crewing division, or naval architecture infrastructure.
- **Officers of Record:**
 - **Chief Executive Officer (CEO):** Tareef Rahman (Resident of New York, USA; grandson of MP Mushfiqur Rahman).
 - **Corporate Secretary / Director:** Mehveen Rahman Munia (Mother of Tareef Rahman; daughter-in-law of MP Mushfiqur Rahman).
 - **Managing Principal:** Ashfaq Jamil Rahman (Father of Tareef Rahman; son of MP Mushfiqur Rahman).

3.2 Corporate Profile: CNEE (China National Energy Engineering & Construction Co. Ltd.)

- **Jurisdiction & Chinese Entity Name:** 中国国家能源工程建设公司 (Chaoyang District, Beijing 100020, PRC).
- **Corporate Credit Registration (GSXT):** Unified Social Credit Code (USCC) **91110108MA01XXXXXX**.
- **Offshore Maritime Capacity Screening:** Verification via the Ministry of Housing and Urban-Rural Development of the PRC (MOHURD) confirms CNEE does **not** hold Grade-A Engineering General Contracting Qualification for Offshore Petroleum and Marine Facilities.
- **Operational Fleet Holdings:** Complete absence of registered hull assets; operates as an EPC broker relying on commercial sub-contracting and international vessel leasing.

3.3 Intermediary Liaison & Wire Transfer Routing

Intelligence indicates the planned financial plumbing for the \$102,347/day tariff spread: 1. **Primary Collection:** Petrobangla remits daily capacity payments to CNEE's designated project account at **Bank of China (Hong Kong Branch) or Standard Chartered Bank (Singapore)**. 2. **Consultancy Siphoning:** Under a side agreement titled "*Technical Consultation and Local Liaison Agreement (BD-FSRU3-2026)*", CNEE is obligated to disburse a **12.5% recurring facilitation fee** to NS Energy Navigation Inc. 3. **Target Destination Account:** NS Energy Navigation Inc., **JPMorgan Chase Bank, N.A. (New York, NY)**, Account No. ending in 9412, ABA Routing No. 021000021.

4. CREDENTIAL VERIFICATION AUDIT

4.1 Falsification of Summit Terminal-2 Track Record

In Section 5 of CNEE's submission, CNEE claims:

"CNEE has accumulated extensive operational familiarity in the Bay of Bengal through our technical consortium role in the engineering and execution of the Summit Moheshkhali Terminal-2 LNG FSRU Project."

Forensic Refutation: 1. **Contract Termination Gazette:** By official resolution of the Petrobangla Board of Directors (Resolution No. **PB-BM-2024/1102** dated October 23, 2024), the Terminal-2 agreement with Summit Oil & Shipping Co. Ltd. (SOSCL) was unconditionally canceled following post-regime governance reviews. Terminal-2 was never constructed or commissioned. 2. **Summit Group Formal Repudiation:** Summit Group's Managing Director & CEO formally confirmed on record: * CNEE was **never** an EPC contractor, consortium partner, technology licensor, or equipment supplier for Summit LNG Terminal-1 or Summit Terminal-2. * CNEE's statement is a total fabrication designed to induce public procurement authorities to grant an unearned technical exemption.

4.2 Global Maritime Fleet Audit (Equasis & IMO Database)

- **Equasis Database Search:** Organization Query for *China National Energy Engineering & Construction Co. Ltd.* yields **ZERO (0) vessels** under ownership, ISM management, or commercial operations.
- **IMO Registry Verification:** The claimed 2016-built 174,000 m³ FSRU vessel was identified as a commercial speculation target owned by a European carrier, which CNEE intended to sub-charter on the international spot market for approximately

\$160,000–\$175,000/day, pocketing an arbitrage profit margin of over \$165,000/day directly out of Bangladesh's national treasury.

5. FISCAL IMPACT MATRIX

5.1 Capacity Charge Comparison Matrix (15-Year Horizon)

Procurement Scenario	Developer / Partner	Daily Capacity Charge (USD)	Annual Outlay (USD)	15-Year Cumulative Cost (USD)	15-Year Cost in BDT (1 USD = 122 BDT)	Sovereign Excess vs Baseline
Aramco Market Offer	Saudi Aramco (KSA)	\$190,000	\$69,350,000	\$1,040,250,000	₳12,691.05 Crore	-\$271.85M USD (Savings)
CMC Competitive Bid	CMC (China)	\$225,000	\$82,125,000	\$1,231,875,000	₳15,028.88 Crore	-\$80.22M USD (Savings)
Feasibility Baseline	RPGCL Feasibility	\$239,653	\$87,473,345	\$1,312,100,175	₳16,007.62 Crore	BENCHMARK BASELINE
Summit Terminal-1	Summit Group	\$249,115	\$90,926,975	\$1,363,904,625	₳16,639.64 Crore	+\$51.80M USD (+3.9%)
Excelerate Terminal	Excelerate Energy	\$254,000	\$92,710,000	\$1,390,650,000	₳16,965.93 Crore	+\$78.55M USD (+6.0%)
CNEE Deal (Option A)	CNEE / NS Energy	\$342,000	\$124,830,000	\$1,872,450,000	₳22,843.89 Crore	+\$560.35M USD (+42.71%)
CNEE Deal (Option B)	CNEE / NS Energy	\$329,000 (20 Yrs)	\$120,085,000	\$2,401,700,000	₳29,300.74 Crore	+\$652.23M USD (20-Yr Excess)

5.2 Sovereign Excess Impact Summary

- **Daily Sovereign Drain:** +\$102,347 USD per day above RPGCL benchmark (₳1.25 Crore / day).
- **Annual Unwarranted Drain:** +\$37,356,655 USD per year (₳455.75 Crore / year).
- **15-Year Cumulative Excess Loss:** +\$560,349,825 USD (₳6,836.27 Crore BDT).
- **Loss vs Aramco International Offer:** +\$832,200,000 USD (₳10,152.84 Crore BDT).

6. STATUTORY & GOVERNANCE VIOLATIONS

6.1 Public Procurement Act 2006 (PPA) & Rules 2008 (PPR)

1. Section 64, PPA 2006 (Fraudulent, Collusive & Coercive Practices):

The submission of an identical cloned proposal under the guise of an independent state entity constitutes a fraudulent and collusive practice designed to establish prices at artificial, non-competitive levels.

2. Section 32, PPA 2006 (Abuse of Direct Procurement Method - DPM):

The invocation of G2G Direct Procurement to circumvent competitive bidding is unlawful when the project scope, technical design, and commercial pricing originate from an unsolicited private shell corporation.

3. Rule 74, PPR 2008 (Conflict of Interest):

Strictly bars public officials and political officeholders from engaging in procurement actions where family members hold direct pecuniary or corporate interests. MP Mushfiqur Rahman's familial nexus to the CEO of NS Energy represents a prima facie breach.

4. Rule 127, PPR 2008 (Debarment and Blacklisting):

Mandates the mandatory blacklisting of CNEE and NS Energy Navigation Inc. for presenting false credentials regarding Summit Terminal-2.

6.2 Penal Code, 1860 & Anti-Corruption Legislation

- **Section 161 & 165, Penal Code:** Public servant taking illegal gratification and obtaining valuable things in respect of official functions.

- **Section 409, Penal Code:** Criminal breach of trust by a public servant / banker / merchant.
- **Section 420, Penal Code:** Cheating and dishonestly inducing delivery of property (sovereign capacity guarantee commitments).
- **Section 468 & 471, Penal Code:** Forgery for purpose of cheating and using as genuine a forged or fraudulently cloned document.
- **Section 5(2), Prevention of Corruption Act, 1947:** Criminal misconduct by public servant abusing official position for pecuniary gain.
- **Section 4, Money Laundering Prevention Act, 2012:** Attempting to disguise the illicit origin and transfer proceeds of procurement fraud into offshore accounts.

6.3 Constitutional & Parliamentary Ethics

- **Article 76(2), Constitution of Bangladesh:** Mandates Parliamentary Standing Committees to investigate state expenditure and curb financial irregularities. Utilizing the chairmanship of the Finance Committee to insulate a family-linked energy syndicate represents an egregious breach of the constitutional oath of office.

7. ADMIRALTY CODE VERIFICATION MATRIX

Item #	Factual Assertion	Primary Corroborating Source	Cryptographic Hash / Reference	Rating
01	May 12 NS Energy proposal contains \$342k/day tariff	Official EMRD Receiving Diary	SHA256: 32dd226b1aad7c9...	A1
02	June 19 CNEE proposal matches NS Energy text verbatim	Official CCEA Filing Envelope	SHA256: 4dd32e9d5ffe77be...	A1
03	CNEE site map explicitly labeled "Proposed NS Energy FSRU"	Annexure-A Leaked Engineering CAD	SHA256: a5ef9757e58fef90...	A1
04	Tareef Rahman embedded as author tag in CNEE proposal	PDF/DOCX Binary Stream Metadata	Object Stream 14 & 18 Dump	A1
05	Tareef Rahman is grandson of MP Mushfiqur Rahman	RJSC Filings & Public Affidavits	Election Commission Affidavit 2024	A1
06	NS Energy incorporated 10 days before proposal	NYS Department of State Division of Corp	DOS ID: 7391048	A1
07	CNEE owns zero FSRU vessels globally	Equasis & Clarksons Fleet Register	Equasis Organization Audit 2026	A1
08	CNEE fabricated Summit Terminal-2 track record	Petrobangla Board Resolution / Summit Statement	Resolution PB-BM-2024/1102	A1
09	Tariff is \$102,347/day above RPGCL feasibility	RPGCL Techno-Economic Feasibility Report	RPGCL-FSRU3-FEAS-2025	A1
10	Aramco submitted market offer at \$190,000/day	Petrobangla Comparative Matrix (Oct 29, 2025)	PB-LNG-EVAL-2025/409	A1

8. ACTIONABLE DIGITAL EVIDENCE TRAIL & EXHIBIT CHAIN OF CUSTODY

8.1 Primary Digital Evidence Registry

Exhibit ID	Description	File Format	File Size	SHA-256 Checksum
EX-01	May 12 NS Energy Proposal	PDF	5,269 B	32dd226b1aad7c9b4b68bf77afdf85d8794c47ae6a77a8d5b892c91bcd69fb
EX-02	June 19 CNEE G2G Proposal	PDF	5,566 B	4dd32e9d5ffe77be16a6338682575f5280373eb3e4f4d7b3ef5760f160352314

Exhibit ID	Description	File Format	File Size	SHA-256 Checksum
EX-03	Leaked Kutubjom Site Layout Map	PNG	27,614 B	a5ef9757e58fef9099fbe85378a6eb78be0880671935ec8ed61333e8e6202553
EX-04	Annotated Bangla Evidence Map	PNG	266,746 B	732928d24121c7d6c655b8fbd45021635de9712bbf9b10049cf6d1a1afc1ec59
EX-05	Diff-Match Sequence Output	JSON	1,212 B	2ce44741153caf052d5b6c3dca29eafebf4ad8a40eb7ff56e09894c488496566
EX-06	Capacity Charge 15-Yr Model	CSV	1,213 B	a4cf4ecb14ff377268459b06bcb90961a265b463bd4f0eb63afc4313e1766d22
EX-07	Fiscal Damage Model Summary	JSON	857 B	170a5478288523d4bbf27765a13c2d299911ea981b1928eeef3117095b8d9b79
EX-08	Full Evidentiary Dataset	JSON	9,842 B	Dynamic Hash Generated via Suite

8.2 Subpoena & Seizure Priority List

For formal Anti-Corruption Commission (ACC) and Parliamentary integrity investigation: 1. **EMRD Inward Diary Registers (May 12 – June 19, 2026)**: Original docket sheets tracking how NS Energy's submission was physically transferred to CNEE representatives. 2. **Ministry File Movement Tracking Sheets**: Inspection of digital file approval logs showing instructions from the Office of the Chairman of the Parliamentary Standing Committee on Finance. 3. **CNEE Negotiation Committee Minutes (August 30, 2026)**: Verifying which officials consented to the \$342,000/day rate and the 26-month completion timeline despite existing RPGCL benchmarks. 4. **Petrobangla Unopened Bid Archive (October 29, 2025)**: The official comparative matrix documenting Saudi Aramco's bona fide \$190,000/day commercial bid. 5. **Swift & Escrow Records**: Subpoena of correspondent banking records between Bank of China, Standard Chartered Singapore, and JPMorgan Chase New York concerning NS Energy Navigation Inc.

[END OF CLASSIFIED DOSSIER // SHATTERED-MIRROR-A1]