

Sidney Sittón Ureta
Calle 50, Torre Global Bank, Piso No.
15, Oficina No. 10.
Phones 264-7502/7539
Cell phone: 6616-1710

Sidney Sittón Abogados

**INTERNATIONAL LEGAL ASSISTANCE IS REQUESTED THROUGH
FOLLOWED SUMMARY LETTER ROGATORIES TO MARTINELLI AND
OTHERS**

DEAR ANTICORRUPTION SPECIAL ATTORNEY

The undersigned, **SIDNEY SITTON URETA**, practicing attorney, male, Panamanian, of legal age, identity card No. 4-142-1733, with professional offices located at Calle 50, Edificio Torre Global Bank, Piso 15, oficina 1510, phone numbers 264-7502 and 264-7539, cellphone No. 6616-1710, domicile where personal and legal notices are received, e-mail: sidney@sittonabogados.net, in my capacity as a technical advocate for **RICARDO MARTINELLI LINARES**, address your honorable office, with due all respect, to request **International Legal Assistance** through letter rogatories, since the US Department of Justice, in the document published on December 21st, 2016, once the company Odebrecht made an agreement with **Switzerland, Brazil and The United States**, in said document it stated as follows:

“In or about, and between 2001 and 2016, ODEBRECHT, along with its coconspirators, knowingly and willingly plotted and agree with others on providing corruptly hundreds of millions of dollars in payments and other valuables to and for the benefit of foreign officials, foreign political parties, foreign political party members, and foreign political nominees to gain improper advantages and influence those foreign officials to obtain or retain businesses in several countries around the world”

FIRST.- INTERNATIONAL LEGAL ASISTANCE

I request that legal assistance be provided to Switzerland, Brazil, the United States, China, and Hong Kong, to determine and identify natural or legal persons with accounts or deposits linked or related to ODEBRECHT or any of their companies related to its Holding society, which result from bribes or to gain advantages or improper influence. I therefore request the provision of the following assistances:

- A. China:** I request the provision of assistances to the following banks of China:
a.1. Bank of China (Taisan Sub-Branch) Taishan

Bank data:	BANK OF CHINA
Full Swift Code:	BKCHCNBJ44M
BIC code and Branch Code:	BKCHCNBJ44M
Branch:	(SUB-BRANCH OF TAISHAN)
City:	TAISHAN
Address:	46 QUIAO HU LU TAICHENG CIUDAD

529200 TAISHAN

Country

China

I request that said bank states if there exist or have existed savings accounts, current accounts, fixed term accounts, safety deposit boxes, securities or transferences from or to that bank, where signatories, final beneficiaries, legal representatives or shareholders of said companies are the following persons:

1. **Fundación Don James**
2. **Michell Lasso**
3. **Jaime Lasso**
4. **Philip Gurian**
5. **Alberto Arístides Arosemena**
6. **Martin Torrijos Espino**
7. **Benjamín Colamarco**
8. **Luis Manuel Hernández**
9. **Odebrecht**
10. **Constructora Internacional del Sur**
11. **Olivio Rodríguez Junior**
12. **Juan Antonio Niño**
13. **Margarita Reategui de Niño**
14. **María Mercedes Rabat de De Janon**
15. **Eduardo Bonilla**
16. **Advansys Group, .S.**
17. **Atom Travel**
18. **Bluesky Global Inc.**
19. **Brewster Oil Corp.**
20. **Burch Overseas Corporation**
21. **Kliddenford, S.A.**
22. **Duna Trading Corp.**
23. **Eco Sauber**
24. **Environmental and Civil Technology**
25. **Lashan Corporation**
26. **Ferness Investments, S.A.**
27. **Sarawak Corporation**
28. **Hando Securities S.A.**
29. **Progamsa Corporation**
30. **Pexo Corporation**
31. **Quinus Services**
32. **Inmobiliaria Junavier, S.A.**
33. **H. Daya International**
34. **Grees Invest Corp S.A.**
35. **Panaglobal Trading, S.A.**
36. **Valmont Management**
37. **Milzart Overseas Holding Inc.**
38. **Gulfstar Business Corp.**
39. **Greenridge Overseas, S.A.**
40. **Addington Ventures Limited**

a.2. **Postal Savings Bank of China:** I request that said bank states if there exist or have existed savings accounts, current accounts, fixed term accounts,

safety deposit boxes, securities or transferences from or to that bank, where signatories, final beneficiaries, legal representatives or shareholders of said companies are the following persons:

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2. **Michell Lasso**
3. **Jaime Lasso**
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5. **Alberto Arístides Arosemena**
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30. **Pexo Corporation**
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32. **Inmobiliaria Junavier, S.A.**
33. **H. Daya International**
34. **Grees Invest Corp S.A.**
35. **Panaglobal Trading, S.A.**
36. **Valmont Management**
37. **Milzart Overseas Holding Inc.**
38. **Gulfstar Business Corp.**
39. **Greenridge Overseas, S.A.**
40. **Addington Ventures Limited**

B. Hong Kong: Standard Chartered Bank (Hong Kong) Limited: I request that said bank states if there exist or have existed savings accounts, current accounts, fixed term accounts, safety deposit boxes, securities or transferences from or to that bank, where signatories, final beneficiaries, legal representatives or shareholders of said companies are the following persons:

1. **Fundación Don James**

2. **Michell Lasso**
3. **Jaime Lasso**
4. **Philip Gurian**
5. **Alberto Arístides Arosemena**
6. **Martin Torrijos Espino**
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35. **Panaglobal Trading, S.A.**
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37. **Milzart Overseas Holding Inc.**
38. **Gulfstar Business Corp.**
39. **Greenridge Overseas, S.A.**
40. **Addington Ventures Limited**

I request the provision of assistances to the following countries and banks:

- C. Switzerland:** I request that the bank superintendence and the regulator of banks of that country states if there exist or have existed savings accounts, current accounts, fixed term accounts, safety deposit boxes, securities or transferances from or to that bank, where signatories, final beneficiaries, legal representatives or shareholders of said companies are the following persons:
1. **Fundación Don James**
 2. **Michell Lasso**
 3. **Jaime Lasso**

4. **Philip Gurian**
5. **Alberto Aristides Arosemena**
6. **Martin Torrijos Espino**
7. **Benjamín Colamarco**
8. **Luis Manuel Hernández**
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35. **Panaglobal Trading, S.A.**
36. **Valmont Management**
37. **Milzart Overseas Holding Inc.**
38. **Gulfstar Business Corp.**
39. **Greenridge Overseas, S.A.**
40. **Addington Ventures Limited**

D. Brazil: I request that the bank superintendence and the regulator of banks of that country states if there exist or have existed savings accounts, current accounts, fixed term accounts, safety deposit boxes, securities or transferences from or to that bank, where signatories, final beneficiaries, legal representatives or shareholders of said companies are the following persons:

1. **Fundación Don James**
2. **Michell Lasso**
3. **Jaime Lasso**
4. **Philip Gurian**
5. **Alberto Aristides Arosemena**
6. **Martin Torrijos Espino**
7. **Benjamín Colamarco**

8. **Luis Manuel Hernández**
9. **Odebrecht**
10. **Constructora Internacional del Sur**
11. **Olivio Rodríguez Junior**
12. **Juan Antonio Niño**
13. **Margarita Reategui de Niño**
14. **María Mercedes Rabat de De Janon**
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33. **H. Daya International**
34. **Grees Invest Corp S.A.**
35. **Panaglobal Trading, S.A.**
36. **Valmont Management**
37. **Milzart Overseas Holding Inc.**
38. **Gulfstar Business Corp.**
39. **Greenridge Overseas, S.A.**
40. **Addington Ventures Limited**

E. The United States: I request that the bank superintendence and the regulator of banks of that country states if there exist or have existed savings accounts, current accounts, fixed term accounts, safety deposit boxes, securities or transferences from or to that bank, where signatories, final beneficiaries, legal representatives or shareholders of said companies are the following persons:

1. **Fundación Don James**
2. **Michell Lasso**
3. **Jaime Lasso**
4. **Philip Gurian**
5. **Alberto Aristides Arosemena**
6. **Martin Torrijos Espino**
7. **Benjamín Colamarco**
8. **Luis Manuel Hernández**
9. **Odebrecht**
10. **Constructora Internacional del Sur**
11. **Olivio Rodríguez Junior**

12. **Juan Antonio Niño**
13. **Margarita Reategui de Niño**
14. **María Mercedes Rabat de De Janon**
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37. **Milzart Overseas Holding Inc.**
38. **Gulfstar Business Corp.**
39. **Greenridge Overseas, S.A.**
40. **Addington Ventures Limited**

I request that all the required States, where those legal assistances will be carried out, be requested to send a copy of every bank documentation of the customer from its opening to the present, including the extract of all bank transactions and the corresponding transferences from and to that account, as well as suspicious reports that have been drafted and Due Diligence reports.

We want to point out that we have information on the fact that the banks of **China** and **Hong Kong**, especially those highlighted, have accounts of exposed political persons identified on the aforementioned list, that come from bribes of **Odebrecht** for the execution of civil works in Panama.

SECOND.- LEGAL ASSISTANCE TO COMPANIES:

I request that legal assistance be provided to **China** and **Hong Kong**, to determine and identify natural or legal persons that have done business with said companies and have received deposits or transferences coming from bribes made by **Odebrecht** or Holding companies for the purchase of merchandise in **China** and **Hong Kong**, for laundering money profited by **Odebrecht** and its subsidiaries.

A. China: I therefore request the provision of assistances to the following companies:

a.1. Taishan Rongfeng Printing Plastic Ltd

According to its website, Taishan Rongfeng Printing Plastic Co., Ltd is a family-owned manufacture company that specialized in the production of HDPE, LDPE, LLDPE, PP, Opp film and bags. The products of Taishan Rongfeng Printing Plastic., Ltd have a wide range of applications such as basic products packaging, medical supplies, food packaging, and daily use of packaging, etc.

The service offered by this company to its customers is flexible and professional. It has a strong sales staff to serve customers in orders, deliveries, and after-sales. OEM products are warmly friendly.

Company information

- Contact Person: Mr. Stefan
- Position: sales manager, sales
- Phone: 86-750-5462368
- Kind of business: Manufacturer
- Main products: soluble strip laundry bag, PE bag, trash bag
- Address: No 111-8, Xinning Road
- Main Markets: World Wide
- Location: Taishan, Guangdong, China

a.2 Taishan Baofeng Plastic & Hardware Co., Ltd.,

According to its website, the company exports Chinese merchandises and packaged merchandises and its products are from China.

Tai Shan Baofeng Plastic & Hardware Co., Ltd is a renowned company specialized in the manufacture of plastic and hardware products widely used in the range of food, cosmetic, hardware, craft, medical care and electronic products.

Information of the company:

- Business category: utensils and dishes
- City Province: Guangdong - China
- Contact Name (MAX YE)
- Address: No. 1 Bu Xi Ling Pei Area De Desarrollo, Shui Bu, Taishan City, Guangdong, China.
- Zip Code: 529262
- Phone: 86-750-5459478
- Fax: 86-750-5459408
- Email: Sida-nb@vip.163.com

I request that said companies state if there exist of have existed purchase agreement, swaps or any kind of commercial transactions from or to said company with any of the following natural or legal persons:

- 1. Fundación Don James**
- 2. Michell Lasso**
- 3. Jaime Lasso**
- 4. Philip Gurian**
- 5. Alberto Arístides Arosemena**

6. **Martin Torrijos Espino**
7. **Benjamín Colamarco**
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35. **Panaglobal Trading, S.A.**
36. **Valmont Management**
37. **Milzart Overseas Holding Inc.**
38. **Gulfstar Business Corp.**
39. **Greenridge Overseas, S.A.**
40. **Addington Ventures Limited**

Likewise, I request that these companies deliver contracts, mails with the customer and bills of landing, as well as payment documents of the goods shipped to Panama.

B. Hong Kong: I therefore request the provision of assistances to the following company:

b.1 BK Rkhater (HK) Ltd:

According to its website, this company offers high quality products, competitive prices and prompt delivery.

This company exports men, women and children's clothing, consumer electronics and lighting equipment.

Information of the company:

- Year – 1980

- Registration code No. 081101
- Form of business: Limited Company
- Kind of company – Central office
- Fax: +852 28106012

Exporter

Area: Central Asia, Central America

Country: India, **Panama**

I request that said company of Hong Kong state if there exist of have existed purchase agreement, swaps or any kind of commercial transactions from or to said company with any of the following natural or legal persons:

1. **Fundación Don James**
2. **Michell Lasso**
3. **Jaime Lasso**
4. **Philip Gurian**
5. **Alberto Arístides Arosemena**
6. **Martin Torrijos Espino**
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20. **Burch Overseas Corporation**
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32. **Inmobiliaria Junavier, S.A.**
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34. **Grees Invest Corp S.A.**
35. **Panaglobal Trading, S.A.**
36. **Valmont Management**
37. **Milzart Overseas Holding Inc.**

- 38. Gulfstar Business Corp.**
- 39. Greenridge Overseas, S.A.**
- 40. Addington Ventures Limited**

Likewise, I request that this company deliver contracts, mails with the customer and bills of landing, as well as payment documents of the goods shipped to Panama.

THIRD.- SPECIAL REQUEST:

I request the seizure of money, securities, goods or assets deposited or administer in the banks of the required states, with regard to the aforementioned list of natural and or legal persons.

FOURTH.- LEGAL BASIS:

Law 11 dated March 31st, 2015 (Official Gazette No. 27752 dated April 1st, 2015).

I therefore request the issuance of the letter rogatories duly translated to the language of the receiving Country.

Panama, at the date of issue.

ATT. SIDNEY SITTON URETA