

OSPINA, DR. PETER HIBBERD AND ISRAEL TEJADA for the commission of the aggravated offence of swindle, falseness, illegal exercise of profession and unlawful association to commit offences.

MISTER DISTRICT ATTORNEY OF THE REPUBLIC:

We, INFANTE & PEREZ ALMILLANO, represented by EDNA RAMOS CHUE, acting on behalf and in representation of HILDA PIZA LUCOM. The hereinafter is to appear before your office in order to submit a formal criminal complaint RICHARD SAM LEHMAN, CHRISTOPHER RUDDY, VICTOR CROSBIE, JOSE ALVAREZ CUETO, AGUSTIN SELLHORN, ANDREA OSPINA, DR. PETER HIBBERD AND ISRAEL TEJADA for the commission of the aggravated offence of swindle, falseness, illegal exercise of profession and unlawful association to commit offences in detriment of WILSON CHARLES LUCOM and our client.

- I. THE PARTIES INVOLVED IN THIS CRIMINAL CHARGE ARE THE FOLLOWING:
 - 1. THE PLAINTIFF: HILDA PIZA LUCOM,
 - 2. THE DEFENDANT:

RICHARD SAM LEHMAN, CHRISTOPHER RUDDY, VICTOR CROSBIE, JOSE ALVAREZ CUETO, AGUSTIN SELLHORN, ANDREA OSPINA, DR. PETER HIBBERD AND ISRAEL TEJADA for the commission of the aggravated offence of swindle, falseness, illegal exercise of profession and unlawful association to commit offences, as well as any other offence that may result from the investigation in process.

II. THE PUNISHABLE ACTS:

The punishable acts in complaint constitute the offences of AGGRAVATED ASSAULT, contemplated in our Penal Code, II Book, Title IV, Article 190:

"One that by means of misleading procures an unlawful benefit for himself or for a third party in detriment of another, will be sanctioned with prison from 1 to 4 years or 50 to 200 days of fine. The sanction will be from 5 to 10 years of prison if the heritage damage exceeds the one hundred thousand dollars or if it is committed by legal representatives, managers or administrators in exercise of their functions, or if they are committed in detriment of the public administration or a charity center".

FALSENESS, contemplated in our Penal Code, II Book, Title VIII, Chapter 1, Article 265:

"One who partially or completely forges a deed, an authentic or public document in the manner that it can cause a detriment, he will be sanctioned with two to five years of

the sanction will be from 3 to 6 years in prison".

Article 266:

"The sanctions provided in the previous article are applicable to whom includes or has someone else include false declarations concerning a fact that a document must prove in the manner that in can result as detriment, in an authentic public deed or document".

ILLEGAL EXERCISE OF PROFESSION, contemplated in our Penal Code, Book II. Title VIII, Chapter V, Article 286.

"One who exerts a profession, for which it is required to have a special authorization, without having obtained the corresponding authorization, will be sanctioned with six months to two years of prison".

UNLAWFUL ASSOCIATION TO COMMIT OFFENCES, contemplated in our Penal Code, Book II, Title VIII, Chapter III, Article 242:

"When two or three persons associate or constitute a gang with the purpose of committing offences, each one of them will be sanctioned, for this only act, with 1 to 3 years.

For the promoters, heads or leaders of these unlawful associations, the sanction will be of 3 to 5 years of prison. The same sanction will correspond to those who provide financial, logistic support or who hire them to commit these offences..."

III. DATE AND LOCATION OF THE FACTS:

The offences were committed, mainly in the Panama Province and District, from the year 2003 to 2006, in a continuous manner.

FACTS THAT BASE THIS COMPLAINT:

FALSENESS:

FIRST: WILSON CHARLES LUCOM granted a will through Public Deed No. 6,646 dated June 20, 2005 which was modified through Deed No. 11,191 dated October 20, 2005 and No. 1,131 dated February 3, 2006 granted by the Second Circuit Notary of Panama, through which he appointed RICHARD SAM LEHMAN and CHRISTOPHER RUDDY as albaceas, and THE FUNDACION WILSON C. LUCOM TRUST FUND, as heir and HILDA PIZA LUCOM, ISABEL MARIA CLARK, LANNY CLARK, CASSANDRA CLARK, MAYO CLINIC OF ROCHESTER, MINNESSOTA, MELINDA ARIAS, HILDA ARIAS, MADELAINE ARIAS, GILBERTO ARIAS, MARGARITA ARIAS, NORAH GARNER, JAMES GIBBONS, ANN SMITH, WALTER GARNER, GARY ELKINS, CHRISTOPHER RUDDY, DR. PETER HIBBERD, MARIO BOYD, ANDREA OSPINA, TANIA TAMOS, ISRAEL TEJADA, EDILBERTO SOTO and THE FUNDACION END WAR TRUST.

JUDICIAL LAW OFFICE OF ALVAREZ, CROSBIE & ASSOCIATES, requested the opening of the Will in the Estate process of WILSON CHARLES LUCOM, which was granted by the Fourth Civil Court of the First Circuit of Panama, by dictating Resolution No. 1025/173-06 dated July 5, 2006.

THIRD: The deeds afore mentioned not only lack of formal omissions in it granting, but false declarations were inserted as follow:

- In said acts VICTOR CROSBIE was appointed as an interpreter and he does not have these faculties as such.
 - a. That each one of the documents was read and approved by WILSON CHARLES LUCOM, which results impossible given that he did not speak Spanish and this was stated by him at the time of the granting of this, and the other documents undersigned by him.
 - b. It was stated that the witnesses gave faith of his however there is no clear evidence that any of these witnesses, ALEXI GUERRA, ZORAIDA DE VERGARA AND JOEL LASSO, understood the English language.
 - c. By means of Public Deed #3881 dated April 21 of 2006 it is stated that the Notary gave faith that WILSON CHARLES LUCOM was in full use of his mental faculties and the document was then altered (it is important to mention that the defendants used these documents to try to move and in fact "disconnect" WILSON CHARLES LUCOM from the devices that were keeping him alive at the Centro Medico Paitilla, a few hours previous to his death fact that was filed in a separate libel).

AGGRAVATED SWINDLE

FIRST: RICHARD SAM LEHMAN, head attorney of WILSON CHARLES LUCOM had allegedly constituted the FUNDACION WILSON C. LUCOM TRUST FUND and the FUNDACION END WAR TRUST, to be the heirs of his fortune and this is the way it was established in the will, however these foundations did not exist at the time of the granting of this hasty public instrument.

SECOND: On June 2, 2006 WILSON CHARLES LUCOM passed away at the Centro Medico Paitilla, in somewhat confusing circumstances and a few days later RICHARD SAM LEHMAN, through the firm which is being sued BUFETE JURIDICO ADMINISTRATIVO ALVAREZ CUETO, CROSBIE & ASSOCIATES, represented by JOSE ALVAREZ CUETO, requested the opening of the testated will of WILSON CHARLES LUCOM based on the will included in Public Deed No. 6,646 dated June 20, 2005, which was modified through Deed No. 11,191 dated October 20, and No. 1,131 dated February 3, 2006 from the Second Notary of the Panama Circuit.

Fourth Court of the Civil Circuit appointed RICHARD SAM LEHMAN as albacea of the testated will of WILSON CHARLES LUCOM however said decision has been appealed by HILDA PIZA LUCOM'S attorneys and is presently pending, it was granted to avoid mayor detriment.

FOURTH: Apparently, making use of the resolution which appointed him as albacea based on the illegitimate will, RICHARD SAM LEHMAN carried out acts disposing of the properties, specifically of account #1010077045838 from the First National Bank in Palm Beach (Wachovia).

FIFTH: Lastly, in a paid publication published on page 51A of the La Prensa newspaper on Thursday, August 31, 2006 it mentions the existence and objectives of a FUNDACION WILSON C. LUCOM, with apparent beneficial purposes, the same does not even exist in Panama and only intends to pressure the real and only universal heiress, HILDA PIZA LUCOM, as well as the jurisdictional authorities that are involved in the processes, using misleading publicity.

SIXTH: RICHARD SAM LEHMAN, made use of the trust granted to him by WILSON CHARLES LUCOM and made him believe that he had constituted the FUNDACION WILSON C. LUCOM TRUST FUND and THE FUNDACION END WAR TRUST, which were allegedly mentioned by the testator as beneficiaries at the time of setting his last will.

SEVENTH: With the purpose of obtaining a benefit for himself or for a third party, RICHARD SAM LEHMAN, was appointed as albacea accruing substantial fees which indicates that he intended to manage the foundation, therefore he did not have the intention of honoring the last will of WILSON CHARLES LUCOM, given that he denied to pay the monthly expenses established in the will in favor of the widow, HILDA PIZA LUCOM.

All of these acts were executed with the collaboration of VICTOR CROSBIE, who mislead WILSON CHARLES LUCOM for many years as described hereinafter in the chapter regarding the illegal exercise of profession, in virtue of which he received the sum of \$159,730.90.

REGARDING THE ILLEGAL EXERCISE OF THE PROFESSION

EIGHTH: RICHARD SAM LEHMAN, who allegedly exerts the law practice in the United States of America, sent constant information sending legal instructions to Panama to be executed by VICTOR CROSBIE, who identified himself as WILSON CHARLES LUCOM'S attorney with the purpose of carrying out important legal transactions that involved disposing of the property and litigations regarding WILSON CHARLES LUCOM.

NINTH: VICTOR CROSBIE, has given numerous legal services to the corporation named Hacienda Santa Monica, S.A., although he does not possess competence to exert the law practice.

during the years 2003, 2004, 2005 and 2006, as we will see further on.

ELEVENTH: VICTOR CROSBIE has collected a total of one hundred and thirty-two (132) checks, distributed in the following manner:

Twelve (12) checks during the year 2003 which amount to \$11,670.00 under the concept of legal fees as detailed in the invoices received by the firm SELLHORN & ASSOCIADOS which justify said checks.

Thirty-six (36) checks during the year 2004 that amount to \$51,018.15 under the concept of legal fees.

Fifty-one (51) checks to pay legal fees during the year 2005 which amount to 61,914.75.

Thirty-three (33) checks during the year 2006 which amount to \$33.253.00.

(exhibit with check details)

TWELVETH: To carry out some of the legal transactions VICTOR CROSBIE operated through several persons, such as BUFETE JURIDICO ADMINISTRATIVO ALVAREZ CUETO, CROSBIE AND ASSOCIADOS, represented by JOSE ALVAREZ CUETO, who appears as VICTOR CROSBIE's partner in said firm. He also operated through the SELLHORN & ASSOCIADOS firm, represented by AGUSTIN SELLHORN who issued invoices for services given in the name of this law firm, through VICTOR CROSBIE.

THIRTEENTH: Among the selection of services offered by VICTOR CROSBIE he has acted on behalf of several processes promoted against HACIENDA SANTA MONICA, S.A. and vice versa, all of this as member of the BUFETE JURIDICO ADMINISTRATIVO ALVAREZ CUETO, CROSBIE & ASSOCIADOS firm, as shown in the letterhead which appears in different communications and many diligences carried out in several Courts of the Republic.

FOURTEENTH: At the same time VICTOR CROSBIE, acted as a public authorized interpreter, such as the time he did so before the Second Circuit Notary of the Republic of Panama in the instruments that are detailed as follow:

Public Deed No. 6,646 dated June 20, 2005 of the Panama Second Circuit Notary, Deed No. 11, 191 dated October 20, 2005 of the Panama Second Circuit Notary and Public Deed No. 1,131 dated February 3, 2006 of the Panama Second Circuit Notary.

FIFTEENTH: According to the certification issued, by the Fourth Court of General Business of the Supreme Court of Justice as well as the Department of Education, Mister VICTOR CROSBIE, does not presently possess any competence to exert the law practice in the Republic of Panama, neither does he possess the competence of a Public Authorized Interpreter.

FIRST: RICHARD SAM LEHMAN, WILSON CHARLES LUCOM'S attorney, making use of the trust the testator deposited in him, apparently convinced WILSON CHARLES LUCOM, by misleading him, to appoint him as albacea of his wealth and supposedly constituted the FUNDACION WILSON C. LUCOM TRUST FUND which was constituted as universal heir of WILSON CHARLES LUCOM'S estate and it is very possible that he intended to manage said foundation without any control whatsoever on behalf of HILDA PIZA LUCOM, sole beneficiary, as we can deduct from several electronic communications. It is presumed that RICHARD SAM LEHMAN is the head of this organization.

SECOND: VICTOR CROSBIE, acted as an interpreter, in the confection of the will and in said act carried out a set of false declarations, such as the fact that each one of the documents were read and approved by WILSON CHARLES LUCOM, which is impossible given that the testator WILSON CHARLES LUCOM is from St. Kitts and warned in his will that he did not understand the Spanish language.

THIRD: RICHARD SAM LEHMAN, who has a law practice in the United States of America, constantly sent information giving instructions of a legal nature to be executed in Panama by the alleged lawyer VICTOR CROSBIE regarding several commercial relations and judicial suits that involved WILSON CHARLES LUCOM.

FOURTH: To carry out some of the legal transactions VICTOR CROSBIE operated through several persons, such as BUFETE JURIDICO ADMINISTRATIVO ALVAREZ CUETO, CROSBIE AND ASSOCIADOS, represented by JOSE ALVAREZ CUETO, who appears as VICTOR CROSBIE's partner in said firm. He also operated through the SELLHORN & ASSOCIADOS firm, represented by AGUSTIN SELLHORN who issued invoices for services given in the name of this law firm.

FIFTH: JOSE ALVAREZ CUETO has collaborated with RICHAR SAM LEHMAN in WILSON CHARLES LUCOM'S estate procedures. This is corroborated by the fact that JOSE ALVAREZ CUETO, from the BUFETE JURIDICO ADMINISTRATIVO ALVAREZ, CROSBIE & ASSOCIADOS requested on behalf of RICHARD SAM LEHMAN the opening of the estate and consequently appointed RICHARD SAM LEHMAN as albacea, in the same manner on July 18, 2006 at 3:21 p.m. JOSE ALVAREZ CUETO received an appeal statement from SALVADOR MUNOZ, legal representative of HILDA PIZA BLONDET against Resolution no. 1025/173-06 dated July 5, 2006, appointing RICHARD SAM LEHMAN as albacea. In said resort is attached the evidence which states that VICTOR CROSBIE is not a licensed lawyer and that the BUFETE JURIDICO ADMINISTRATIVO ALVAREZ, CROSBIE & ASSOCIADOS firm did not exist at that time. Coincidently, the next day, RICHARD SAM LEHMAN withdrew a substantial amount of money from an account under the name of WILSON CHARLES LUCOM, deposited at the First National Bank in Palm Beach (WACHOVIA), for the amount of SIX HUNDRED FIFTY FIVE THOUSAND TWO HUNDRED AND FORTY-ONE DOLLARS AND TWENTY-FIVE CENTS (\$655,241.25).

SIXTH: RICHARD SAM LEHMAN, as head of the organization, with the support of VICTOR CROSBIE and JOSE ALVAREZ CUETO, with their several acts made

them up and that his assets were protected, which is totally untrue given that they have committed acts directed to avoid the compliance of what was supposed to be the last will expressed in by his client, WILSON CHARLES LUCOM.

SEVENTH: It is important to mention that in the last codicil or modification made to the will, which was made under the instructions of RICHARD SAM LEHMAN, he included ISRAEL TEJADA (who intended to facilitate WILSON CHARLES LUCOM's hospital transfer) as beneficiary of WILSON CHARLES LUCOM as well as ANDREA OSPINA, ISRAEL TEJADA'S ex-wife, which in turn was WILSON CHARLES LUCOM'S secretary and whom managed a checking account to which RICHARD SAM LEHMAN transferred funds to in order to carry out the legal transactions mentioned above and who referred VICTOR CROSBIE as lawyer and interpreter, who then appeared to lack competence of having either of the said professions.

EIGHTH: PETER HIBBERD, was WILSON CHARLES LUCOM's doctor and was appointed as beneficiary by him and coincidently was the doctor who was supposed to take care of him when he would have been transferred from the Centro Medico Paitilla.

NINTH: RICHARD SAM LEHMAN and CHRISTOPHER RUDDY, self-appointed themselves as "albaceas for medical purposes", (despite the fact that albaceas only act upon the demise of the grantor) and as responsible of the execution of a "will declaration" which is nothing else than an authorization to execute euthanasia or prevent the extension of life expectancy in critical health situations, all of this by means of the confections of Public Deeds which are numbered as follow:

- 1. Public Deed No. 3880 of the Panama Second Circuit Notary "By which WILSON CHARLES LUCOM, grants special power in favor of HILDA P. LUCOM, RICHARD S. LEHMAN and CHRISTOPHER RUDDY" dated April 21, 2006.
- 2. Public Deed No. 3881 of the Panama Second Circuit Notary "By which WILSON CHARLES LUCOM appoints his albaceas for medical attention purposes" dated April 21, 2006.
- 3. Public Deed No. 3882 of the Panama Second Circuit Notary "By which WILSON CHARLES LUCOM, carries out his free will declaration" dated April 21, 2006.

The penal code typifies this criminal conduct in Book II, Title VII, Chapter III, article 242, which reads as follow:

"When two or three persons associate or constitute a gang with the purpose of committing offences, each one of them will be sanctioned, for this only act, with 1 to 3 years.

For the promoters, heads or leaders of these unlawful associations, the sanction will be of 3 to 5 years of prison. The same sanction will correspond to those who provide financial, logistic support or who hire them to commit these offences.

The sanction will increase one third when the author possesses firearms without being legally authorized to do so"

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RICHARD LEHMAN	Coordination and misleading to take possession of the deceased's property, as well as contacting false attorneys to carry out procedures in Panama
CHRISTOPHER RUDDY	Appointed as albacea jointly with RICHARD LEHMAN, to manage the properties of WILSON CHARLES LUCOM, according to the will which is unlawful and false.
VICTOR CROSBIE	False attorney, who carried out all of the legal processes and instructions given by RICHARD LEHMAN, and who in addition acted as an interpreter in some of the deceased wills without having the competence of an authorized translator.
AGUSTIN SELLHORN	Practicing lawyer who allows VICTOR CROSBIE to act as a lawyer of his law firm, while he is not dully admitted to exert said profession.
JOSE ALVAREZ CUETO	Exerting lawyer, who allowed VICTOR CROSBIE to act as a lawyer of his firm being that his not fit to exert this profession.
ANDREA OSPINA	Personal Secretary of the deceased, followed instructions from RICHARD LEHMAN, in the criminal organization and also received wires on behalf of the same for the legal proceedings carried out by VICTOR CROSBIE.
PETER HIBBERD	Was the doctor of the deceased, also appointed as beneficiary, was the doctor who was supposed to attend him when he would be transferred from the Paitilla Hospital outside of the country.
ISRAEL TEJADA	Ex husband of ANDREA OSPINA and WILSON CHARLES LUCOM's driver, he was the one who contacted VICTOR CROSBIE, to act as a lawyer and received direct instructions from RICHARD LEHMAN.

V. REQUEST:

Based on the facts expressed above, we request that an investigation of the regulations, and that the corresponding sanction be imposed to the defendants.

VI. SPECIAL PETITION

Given that one of the conducts in this complaint constitutes an offence of aggravated swindle, and due to the fact that the damages exceed ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) and that it was executed by a legal representative and/or albacea whose position can be compared to a property administrator for which the penal

preventive detention of RICHARD SAM LEHMAN.

VII. EVIDENCE:

FUNDAMENTALS: Attached are the following:

- 1. Authenticated copy of Public Deed No. 14,113 dated august 16, 2006, by which HILDA ANTONIA PIZA BLONDET, grants General Power for INFANTE & PEREZ ALMILLANO to represent her in any lawsuit.
- 2. WILSON C. LUCOM'S death certificate.
- 3. Marriage certificate of WILSON C. LUCOM and HILDA PIZA ARIAS.
- 4. Simple copy of the negative certificate of the FUNDACION WILSON C. LUCOM
- 5. Simple copy of the negative END WAR TRUST
- 6. Certification issued by the General Secretary of the Supreme Court of Justice, in which is stated that VICTOR CROSBIE is not a lawyer.
- Certification issued by the Education Department which states that VICTOR CROSBIE is not a Public Authorized Interpreter.
- 8. Certification issued by the Ministry of Government and Justice which states that VICTOR CROSBIE is not a Public Authorized Interpreter.
- Authenticated copy of Resolution no. 1025/173-06 dated July 5, 2006 through which the testated estate of WILSON CHARLES LUCOM is open appointing RICHARD SAM LEHMAN as albacea, among other declarations.
- 10. Authenticated copy of Resolution no. 1227 dated august 31, 2006 through general protective measures are dictated, consisting on avoiding any type of management or disposition of properties in relation with the will of WILSON CHARLES LUCOM.
- 11. Authenticated copy of Public Deed No. 6646 of the Panama Second Circuit Notary "by which WILSON CHARLES LUCOM grants his last will" dated June 20, 2005.
- 12. Authenticated copy of Public Deed No. 11191 of the Panama Second Circuit Notary "by which WILSON CHARLES LUCOM grants his last will" dated October 20, 2005.
- 13. Authenticated copy of Public Deed No. 11191 of the Panama Second Circuit Notary "by which WILSON CHARLES LUCOM grants his last will" dated February 3, 2006.
- 14. Authenticated copy of Public Deed no. 3880 of the Panama Second Circuit Notary "By which Mister WILSON CHARLES LUCOM, grants special

- CHRISTOPHER RUDDY" dated April 21, 2006.
- 15. Authenticated copy of Public Deed no. 3881 of the Panama Second Circuit Notary "By which Mister WILSON CHARLES LUCOM appoints his albaceas for his medical care" dated April 21, 2006.
- 16. Authenticated copy of Public Deed no. 3882 of the Panama Second Circuit Notary "By which Mister WILSON CHARLES LUCOM makes a free will declaration" dated April 21, 2006.
- 17. Authenticated copy of Public Deed no. 4648 and 4649, both dated May 12, 2006, "By which mister WILSON CHARLES LUCOM, states his will regarding the funds in his savings account #04-01-02-004975-0 in Banco General.
- 18. Original copies of 131 drawn by WILSON LUCOM and/or PAOLA OSPINA, in favor of VICTOR CROSBIE and collected by him for the payment of professional legal fees detailed in the chart in the eleventh numeral of this complaint.
- 19. Newspaper clipping of the ad published in page 51A of the La Prensa newspaper dated Thursday, August 31, 2006 regarding the FUNDACION WILSON C. LUCOM.
- 20. Copy of the criminal complaint for offence against the life and personal integrity of WILSON CHARLES LUCOM.

REPORTS:

Have the following entities officiated:

- 1. The La Prensa newspaper, in order to request an authenticated copy of the payment receipt corresponding to the ad publication which appeared in page 51A of the Business and Economy Section on Thursday, August 31, 2006. As well as an authenticated copy of the order and/or publication request.
- 2. The Florida Bar, in order to certify that RICHARD SAM LEHMAN is fit to exert the law practice in said State. We request the confection of the corresponding rogatory letter and attending the provided by Law no. 32 dated august 1, 2006, by which modifications are made to the Judicial Code regarding International Law, that it will be allowed to us to receive the rogatory letter by immediate express courier.
- 3. First National Bank in Palm Beach (WACHOVIA) in order to certify the hereinafter:
 - a. The existence of the accounts detailed below:
 - b. Submit an authenticated copy of the last transactions of said account corresponding to the month of June of 2006.
 - c. Submit an authenticated copy of the withdrawal orders and/or any document that support said disposition acts reflected by the transactions carried out in said account forwarding WILSON C. LUCOM'S demise, as of June 2 until this date. We request that a rogatory letter be

by which modifications are made to the Judicial Code regarding International Law, that it will be allowed to us to receive the rogatory letter by immediate express courier.

- 4. Finance and Economy Ministry to request an authenticated copy of Mr. VICTOR CROSBIE'S income tax reports.
- 5. Fourth Circuit Civil Court of the First Judicial Circuit of Panama, to request an authenticated copy of the Open Testated will file of WILSON CHARLES LUCOM which credits some of the acts carried out by VICTOR CROSBIE in the BUFETE JURIDICO ADMINISTRATIVO ALVAREZ, CROSBIE & ASSOCIADOS firm
- 6. Second Circuit Judicial Court of Cocle, Civil branch, in order to request an authenticated copy of the file in the BUENAVENTURA VS. HACIENDA SANTA MONICA. S.A. case.
- 7. The Panama Second Circuit Notary in order to request an authenticated copy of the following public instruments: Public Deed No. 10553 dated October 5, 2005.

OCULAR INSPECTION

- We request that an ocular inspection diligence to the bookkeeping records of ALVAREZ, CROSBIE & ASOCIADOS, in order to determine the payments received by VICTOR CROSBIE, for legal professional fees.
- 2. We request that an ocular inspection diligence be carried out as well to the bookkeeping records of SELLHORN & ASOCIADOS, in order to determine the payments received by VICTOR CROSBIE, for legal professional fees.

Panama, September 11, 2006.

Infante & Perez Almillano

Edna Ramos Chue