



Superintendencia
de Bancos de Panamá

May 15, 2014
Circular N° SBP-DPC-FID-0047-2014

General Manager

Subject: OFAC List. Due Diligence. Ignacio Eduardo
Plata and others. Panamanian Corporations.
(Rule 12-2005)

Dear General Manager

The Department of the Treasury of the United States of America, through the Office of Foreign Asset Control (OFAC), has included in the Foreign Narcotics Kingpin Designation Act (the Clinton List) a list of persons and legal entities that must be treated, within their respective operations, with the reservations and measures designed to prevent the misuse of banking services to be provided.

Among the seven (7) people included in the list in May 2014, which is attached for your reference, is the Resident Agent, Ignacio Eduardo Plata Rivera, his son, Jorge Alberto Plata McNulty and three (3) members of his law firm: Margarita Ines Perez Fabrega, Vielka Judith Martinez Lasso and Maria Janette Mora Sanchez. The list also includes Marylu Omeara Navarro and Ali Hassan Cheaitelly Sahely (aka Alex), the son of Jorge Fadlallah Cheaitelli.

Among the legal entities included in this list are Berlin International, S.A.; Fundacion H.M.M.; CMF Internacional, Inc.; GCH & Sons, Co., Inc.; Yoruma Shipping Company, S.A.; Inversiones Omega Internacional, S.A.; Beauty Station, S.A.; Inmobiliaria Davitov, S.A.; Euro Financing, Corp.; Eurocambio Investment, S.A.; A.F.A.I. Corp.; Thea Holding & Co., Inc.; Inversiones Trol Panama, S.A.; Berlin Industries, Corp.

In connection with the above, we would greatly appreciate your providing the pertinent instructions to your staff, in order for them to analyze and report any transactions or operations carried out at your bank by or on behalf of any of the above people or legal entities, following the parameters and procedures established in Law 42 of 2000, the Banking Law and Rule 12 of 2005.

Best regards,

Gustavo A. Villa
Interim Superintendent

Enc.: A/S

MSV/mddec

"Velando por la solidez del Centro Bancario Internacional"