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REQUEST FOR ASSISTANCE

BY

THE PROSECUTOR OF THE INTERNATIONAL TRIBUNAL
FOR THE PROSECUTION OF PERSONS RESPONSIBLE FOR SERIOUS
VIOLATIONS OF INTERNATIONAL HUMANITARIAN LAW
COMMITTED IN THE TERRITORY OF THE FORMER YUGOSLAVIA
SINCE 1991

TO

THE GOVERNMENT OF
THE REPUBLIC OF CYPRUS

CONCERNING

THE PROVISION OF INFORMATION REGARDING
COMPANIES CONTROLLED BY SLOJODAN MILOŠEVIĆ

Carla Del Ponte, Prosecutor of the International Tribunal for the Prosecution of Persons Responsible for Serious Violations of International Humanitarian Law Committed in the Territory of the Former Yugoslavia since 1991, established pursuant to resolutions 808 and 827 (1993) of the Security Council acting under Chapter VII of the Charter of the United Nations, (hereinafter referred to as "the International Tribunal") presents her compliments to the Government of The Republic of Cyprus and has the honour of informing it of the following facts:

1. Article 18.2 of the Statute of the International Tribunal and Rule 39 of its Rules of Procedure and Evidence provide *inter alia* that in the conduct of an

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investigation the Prosecutor may collect evidence and undertake such other matters as may appear necessary for completing the investigation and the reputation and conduct of the prosecution at the trial, and that the Prosecutor may seek, to that end, the assistance of any state authority concerned.

2. Rule 40 of the Rules of Procedure and Evidence of the International Tribunal provides *inter alia* that in case of urgency the Prosecutor may request any State to seize physical evidence and take all necessary measures to prevent the destruction of evidence.
3. The Prosecutor has the honour of requesting that the Republic of Cyprus provide her with further detailed information about eight companies operating bank accounts in the Republic of Cyprus. In order that her request may receive due consideration, the Prosecutor hereby provides the following information.
4. On 24 May 1999, an indictment was confirmed by a Judge of the International Tribunal against Slobodan Milošević, Milan Milutinović, Nikola Šainović, Dragoljub Ojdanić and Vlastko Stojiljković for war crimes committed in Kosovo in 1999. In addition, the Prosecutor has opened, and is currently conducting, investigations (OTP-INV-05-2000 and OTP-INV-03-2000) into allegations that Slobodan Milošević (Milošević) is responsible for, *inter alia*, serious violations of international humanitarian law, including crimes against humanity and violations of the laws and customs of war, committed in Croatia from 1991 to 1995 and in Eastern Bosnia from 1992 to 1995. The prosecutor has announced that indictments will be prepared shortly as a result of these investigations.
5. On Sunday, 1 April 2001 Milošević was arrested on domestic charges and taken into custody by Officers from the Ministry of Interior of the Republic of Serbia. Milošević was charged with the offences of misuse of official position and organising to commit criminal acts under the Criminal Code of the Republic of Yugoslavia and the Criminal Code of the Federal Republic of Yugoslavia. These charges relate, in part, to allegations that Milošević, whilst serving in the capacity as the President of the Republic of Serbia to 17 May 1997 and subsequently serving in the capacity of the President of the Federal Republic of

CONFIDENTIAL

Yugoslavia ("FRY") until 5 October 2000, misused his official position to "obtain material and other benefits for himself, for a number of other persons and the Socialist party of Serbia and the President of the Federal Republic of Yugoslavia". Milošević committed the criminal act of "organising to commit criminal act" by "organising a group of the following federal officials: Mr Mihalj Kertes, Director of Federal Customs Agency, Mr Nikola Sainović, Deputy Prime Minister of the FRY, Mr Jovan Zibic, Deputy Prime Minister of FRY, and others in 1994 and in 1995, by agreeing with them and instructing them to violate and not implement federal regulations".

6. In the commentary with the charges numerous allegations were made, inter alia:

"Considerable amounts of the aforementioned funds were taken abroad for alleged acquisitions of equipment for the National Security Department. On 4 December 1997, as agreed with the Director of the Beogradska Bank, Borka Vucic, 7,010,000 German marks were disbursed and taken to the Beogradski Bank branch office in Cyprus. Furthermore, on four occasions, the secondly accused Kertes also travelled to Cyprus and carried hard currency allegedly for the National Security Department's need without any records on carrying the funds out of the country. These funds were taken out illegally and without any record whatsoever".

"A substantial part of the foreign exchange funds was paid out directly in the name of, or for the account of the MUP (Interior Ministry) of Serbia, the State Security Service. In this regard the first charged, Slobodan Milošević issued a special order to the second charged Mihalj Kertes that all requirements submitted by leaders of the service of that Service, and chiefly the head of that Service, had to be met by payment of the amount requested, and that this method of payment, remained in place throughout the time the second accused Mihalj Kertes was director of the Federal Customs Administration. On the basis of checks and inspections of the documents of the Federal Customs Administration, it was established that funds amounting to

CONFIDENTIAL

3

DM 38,000,000 paid on the basis of customs dues through the Belgrade Bank stockholders company in Belgrade were taken out of the FRY without the permission of the National Bank of Yugoslavia and credited to the Belgrade Bank at the BB COBU in Cyprus and then transferred on to the accounts of foreign companies."

7. The charges also discuss the recipients of the payments, which were only partially identified at the time of the arrest:

"For these payments the Belgrade Bank has so far made available for inspection only part of the documentation for an amount of about DM 6,500,000 while the remaining documentation is said to be in foreign banks and not accessible at present. On the basis of inspection of the documents made available it has not been possible to establish what the payments were used for. . . . *Large sums from these resources were taken out of the country allegedly to procure equipment for the needs of the State Security Service; and in accordance with this, and in agreement with Belgrade Bank chairman, Borka Vucic, sums totalling DM 7,010,000 were disbursed on 4.12.97 to be taken to the branch of the Belgrade bank in Cyprus.*" (emphasis added).

8. The charging materials included documents that traced the payment of DM 6.5 million, referred to in the above paragraph. These documents established that twenty-three payments were made from bank accounts held in the name of **Browncourt Enterprises Limited, Lamora Trading Limited and Verleon Management Limited** and all held with the Cyprus Popular Bank.

9. In response to the charges, on Monday, 2 April 2001 Milošević provided a three-page signed reply. In this reply Milošević stated, inter alia:
- "Those 'others' to whose benefit all this was done are exclusively our state and people, defence and security of our country and our economy"...
- "No-one stole or seized, nor was this a secret from everyone, the money (that) was provided through Beogradska Bank was for the needs of the economy, the most endangered social-economy hotspots, in times of crisis. *Those who were in need were aided and this was my personal orientation and directive.*" ... (Emphasis added.)

Referring to the assets spent on weapons, ammunition and other needs of the Army of the Republika Srpska and Republic Srpska Krajina, those expenses could not be shown in the Law on Budget, which is a public document, for the reasons that they were of the state interest and state secret. The same relates to the expenses for equipping of the security forces and, especially, special anti-terrorist forces; (and) they were provided with everything possible, starting from light weapons and equipment for the helicopter and other devices. ... and that was not published in public because it was a state secret in the same way that, until recently, it was not revealed what went to the Army of the Republic of Srpska....

10. On 15 December 2000, the current Governor of the National Bank of Yugoslavia, Mr. Miladjan Dinkic, wrote to Mr. Alexantia Alexentiou, the Governor of the Central Bank of Cyprus ("the letter"). In the letter Mr Dinkic stated, *inter alia*, "After the introduction of the political and economic blockade against the former Socialist Federal Republic (SFRY) in 1992, we believe that the majority of the foreign currency sent offshore was channelled at one point or another via banks in Cyprus (Beogradska and Vojvodjanska). In addition, we have also learned that financial institutions from the former SFRY, and later the Federal Republic of Yugoslavia (FRY), used offshore business units in Cyprus and other jurisdictions as fronts to hold accounts with banks in Cyprus in order to carry out a variety of financial transactions on behalf of parties related to the Slobodan Milošević regime and business enterprises controlled by or for Milošević and his regime" (emphasis added)...
11. On 13 April 2001, Governor Mladjan Dinkic stated in a letter to the Prosecutor, that, regarding certain accounts established in Cyprus, "... (We have probable reason to believe that the money deposited in these accounts has been illegally taken out from the Federal Republic of Yugoslavia."
12. Officials from the Serbian Ministry of Interior ("the officials") visited the Office of the Prosecutor of the ICTY between Monday 23 April and Wednesday 25 April 2001. During this visit, the officials stated *inter alia*, that:
 - i. In order to avoid the United Nations sanctions, the authorities of Yugoslavia had set up a number of companies and bank accounts based

in Cyprus and Greece. The actual controllers of these companies were concealed from the banking officials in Cyprus and Greece. This concealment was achieved by placing the names of individuals who had no knowledge of the companies, and who were, in effect, unwitting and unknowing participants in the scheme, on the official bank disclosure documents. These companies traded on behalf of Yugoslavian companies, however these companies appeared to third parties to be Cypriot or Greek companies; and

ii. Kerics had used several entities in his illegal scheme to transfer cash from the Yugoslavian Customs department to accounts held in the name of offshore (non-Yugoslavian) companies.

13. Pursuant to its ongoing investigation, the Office of the Prosecutor has identified 8 companies ("named companies") that the Prosecutor believes were set up under the instructions of Mr Vučić at the direction of Stobran Milošević. The names of these companies are: Antexol Trade Ltd ("Antexol"), Browncourt Enterprises Ltd ("Browncourt"), Cabcom Marketing Ltd ("Cabcom"), Hillsay Marketing Ltd ("Hillsay"), Lamoral Trading Ltd ("Lamoral"), Southmed Holdings Ltd ("Southmed"), Vericon Management Ltd ("Vericon") and Vantervost Overseas Ltd ("Vantervost"). These eight companies all operated bank accounts with banks located in the Republic of Cyprus and the Republic of Greece.

Browncourt Enterprises Ltd.

14. The Prosecutor has obtained the following information in relation to Browncourt:

- i. Corporate documents disclose that:
 - Browncourt was incorporated in Cyprus in June 1995 by the law offices of Tassos Papadopoulos and Co ("the law offices");
 - The law offices notified authorities that the beneficial owner of Browncourt was Radmila Budisin, a Serbian jurist working for the legal department of Bеоградска Banka, Belgrade.

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- The signatory to this account was Ms Mairy Merheje, an employee of the law offices;
- Ms Budisin was interviewed by investigators of the OTP and stated that:
 - Browncourt was created without her signature, knowledge or permission and she had no control of the company since its inception in June 1995;
 - She had no knowledge of nor ever gave permission for bank accounts to be opened in the name of Browncourt;
 - She was unaware that law firm of Tassos Papadopoulos ("Tassos Papadopoulos") or the law offices had established this or any other company in her name. While she knew Pambos Ioannides through his representation of Beogradska Bank in Cyprus, he never discussed with her or informed her of her "ownership" of Browncourt; and
 - She is the distant relative of Borka Vučić's deceased husband.

Antexul Trade Ltd.

- 15. The Prosecutor has obtained the following information in relation to Antexul:
 - i. The law offices established Antexul Trade Limited in 1992, naming Ljiljana Radenković as the beneficial owner;
 - ii. The law offices transferred ownership of Antexul from Ms Radenković to Ms Budisin (the owner of Browncourt) in 1995;
 - iii. Investigators from the OTP have interviewed Ms Radenković who stated that:
 - Since 1989 she has worked for the Anglo-Yugo Bank ("AY Bank") in London. Beogradska Bank, Belgrade is the majority shareholder of AY Bank;
 - During this period of time, Borka Vučić was the Executive Chairperson and the Chief Executive Office of Beogradska and the Executive Chairperson of the AY Bank;
 - In late 1995 or early 1996, Borka Vučić told her that in order to prevent the seizure of the assets of Beogradska, as a result of a large lawsuit, Vučić was planning to establish several trading

CONFIDENTIAL

- companies under different names and to transfer Beogradska Bank's liquid assets to the accounts of these companies;
- Radenković was told by Vukić to sign an undated document that referred to the establishment of a company in Cyprus known as Antexol. The document authorized Beogradska Banka, Offshore Banking Unit, Nicosia to handle all the affairs and transactions of the company;
- Ms. Radenković was taken to a law office in London for the signing of the document and believed the office to be associated with the Cypriot law firm, Tassos Papadopoulos and Co.;
- Ms. Radenković signed the document under threat of losing her job at AY Bank; and
- After this event, Ms. Radenković had no further discussion with any officials regarding Antexol or its management until 2001 when she was contacted by the OTP.

iv. Ms Budisin has stated to OTP investigators that she has no knowledge of the company Antexol being transferred to her in 1995 and this transfer was done without her signature, knowledge or permission.

Vantervest Overseas Ltd

16. The Prosecutor has obtained the following information in relation to Vantervest:

- i. Corporate Documents disclose:
 - Vantervest was incorporated in Cyprus in 1992 by the Cypriot law firm Tassos Papadopoulos and Co;
 - at the time of incorporation, the beneficial owner of this company was Mr. Budimir Costić;
 - in June 1995, the law offices notified the Central Bank of Cyprus that the new beneficial owner of this company was Ms Zagorka Corović;
 - and
 - Biographical records provided to authorities in 1995 listed Ms Corović's date of birth as 21/7/1914 or 81 years of age at the time of the transfer.

- ii. Ms. Zagojka Corović was interviewed by Belgrade authorities and stated that she:
 - Is the elder cousin of Borka Vučić;
 - Had no knowledge of Vantervest, Vericon or Hillsay or any other company being associated with her name;
 - Did not give permission for anyone to use her name as an owner of this or any other company; and
 - never controlled Vantervest, Vericon or Hillsay.

- iii. In her interview to the OTP, Ms. Bukljin has stated to OTP investigators that:
 - she is an acquaintance of Ms. Corović and that Ms. Corović is also a relative of Borka Vučić;
 - Ms. Corović received her legal training in Belgrade before immigrating to Brazil approximately 50 years ago and had recently returned to live in Belgrade, Yugoslavia; and
 - Ms. Corović is retired and lives a modest life in Belgrade, Yugoslavia.

- iv. Records previously provided by authorities from the Republic of Greece disclose that:
 - the authorised signatories to the accounts of Vantervest Overseas Trading Ltd were Pambos Ioannides and Nairy Merheje; and
 - on 31 March 1993, Mr Pambos Ioannides in his capacity as a director of Vantervest, wrote to the General Manager of the European Popular Bank and requested to open accounts in USD, DEM and CHF denominations.

Vericon Management Ltd.

17. The Prosecutor has obtained the following information in relation to Vericon Ltd:
 - i. records from the Government of Cyprus disclose that:
 - Vericon was incorporated in Cyprus by the law firm Tassos Papadopoulos in 1995;

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CONFIDENTIAL

- the letter of incorporation was signed by Nairy Merveje, an employee of the law firm Tassos Papadopoulos;
 - the law offices notified the Central Bank of Cyprus that the beneficial owner was Zagorka Corovic, the same beneficial owner as Vantervest; and
 - Vericon's authorised signatories are Pambos Ioannides and Nairy Merveje of the law firm Tassos Papadopoulos.
- ii. Documents supplied by authorities in the Republic of Greece reveal that on 20 July 1995, Mr Marios Ellides and Mr Theodoros Panayides, (members of the law offices) in the capacity as directors of Vericon requested to open bank accounts with the European Popular Bank;
- iii. Ms. Zagorka Corovic has no knowledge of Vericon.

Hillsay Marketing Ltd.

18. The Prosecutor has obtained the following information in relation to Hillsay :
- i. Records from the Government of Cyprus disclose that:
 - Hillsay was incorporated in Cyprus by the law firm Tassos Papadopoulos in September 1993;
 - The beneficial owner of Hillsay at the time of incorporation was Cybenco Trading Ltd;
 - Cybenco Trading Limited is a Cypriot International Business Enterprise ("IBE") whose share capital is owned by Mr George Karacolis of 6 Koridallou Valaoritou Street, Athens, Greece; and
 - On 2 April 1998 Tassos Papadopoulos notified the Central Bank of Cyprus that the beneficial ownership of Hillsay was transferred to Vericon. As noted above, the beneficial owner of Vericon is Ms Zagorka Corovic, who has stated she has no knowledge of any of these companies.
 - ii. Records obtained from the Cypriot authorities in relation to Cybenco Trading Limited disclose that:

CONFIDENTIAL

10

- The company's registered offices are at Chanteclaire Building, 2 Sofull Street, Nicosia, Cyprus. This is the same address as the law offices of Tassos Papadopoulos and Co;
- The executives of the company are recorded as Pambos Ioannides, Nairy Merhez and Evi Argyrou. These individuals are all associates of the 'Law Offices of Tassos Papadopoulos';
- iii. Documents supplied by authorities from the Republic of Greece reveal that on 12 November 1993, Mr Pambos Ioannides, in the capacity as a director of Hillsay wrote to the General Manager of the European Popular Bank and stated that Hillsay had resolved to open bank accounts with the European Popular Bank in USD, DEM and CHF denominations.

Lamoral Trading Limited

19. The Prosecutor has obtained the following information in relation to Lamoral:
- i. records from the Government of Cyprus disclose that:
 - Lamoral was incorporated in Cyprus by the law offices of Tassos Papadopoulos in May 1993;
 - The law offices identified Mrs Olga Nikic, Hosimina 37, Belgrade Yugoslavia as the beneficial owner of Lamoral at the time of incorporation;
 - Beobanka Banka vouched for Mrs Olga Nikic stating "(Olga Nikic) is known to us and we consider her financially sound, creditworthy and reputable and has always promptly responded to all financial obligations". This wording is identical to the wording used by Beobanka Banka to vouch for Zaprorka Corovic and Ms Lilijana Rudenkovic in the documentation provided to the Central Bank of Cyprus that recorded them as the beneficial owners of Antexol and Vantinvest. Ms. Budisin has stated to Office of the Prosecutor investigators that she was unaware of any such letter "vouching" for her had been prepared.
 - Bank accounts for Lamoral were opened with the Cyprus Popular Bank Ltd by the law firm Tassos Papadopoulos;

- On bank account opening documents, Mr Pambos Ioannides from the law offices of Tassos Papadopoulos, signed an application to open a bank account in the capacity as Chairman of Lamoral; and
 - The signatories to these bank accounts were "Pambos Ioannides, Nairy Merheje, Nicos Pappalsthion together with any one of Elena Mouskou, Costas Kermitzis or Julia Kyriakidou". These individuals were all employees of the law offices of Tassos Papadopoulos. Telephone instructions to operate the account could be given by Pambos Ioannides or Nairy Merheje.
- ii. Documents supplied by authorities from the Republic of Greece reveal that on 1 September 1993, Mr Pambos Ioannides and Mrs Nairy Merheje, in their capacity as directors of Lamoral, resolved to open bank accounts with the European Popular Bank in USD, DEM and CHF denominations. On 6 September 1993, Mr Pambos Ioannides wrote to the General Manager of the European popular Bank and requested that these accounts be opened;
- iii. Ms. Olga Nikić was interviewed by Belgrade authorities and stated that:
- She was an employee of Boobanka;
 - From 1992 to 1993 she worked at Beogradska Banka, Cyprus;
 - When she returned to Belgrade from Cyprus a courier delivered documents to her with a directive from Beogradska Banka executive, Slobodan Acimović stating that she should sign the documents, which she did;
 - She had no knowledge of Lamoral and was unaware that she was the beneficial owner of such a company; and
 - She had never controlled or knowingly given others control of Lamoral.

Southmed Holdings Limited

20. The Prosecutor has obtained the following information in relation to Southmed:

- i. records provided by the Central Bank of Cyprus disclose that:
 - Southmed was incorporated in Guernsey on 23 April 1993 and established in Cyprus by the law firm Tassos Papadopoulos in December 1993;
 - Under Cypriot law, as Southmed is incorporated in a foreign jurisdiction there is no requirement to forward the names of the beneficial owner(s) of the company to the Central Bank of Cyprus;
 - Bank accounts for Southmed were opened with the Cyprus Popular Bank Ltd by the law firm Tassos Papadopoulos;
 - On bank account opening documents Mr Pambos Ioannides, from the law firm Tassos Papadopoulos signs an application to open a bank account in the capacity as Chairman of Southmed; and
 - The signatories to these bank accounts were "Pambos Ioannides, Nairy Mervejs, Nicos Papaefstathiou together with any one of Elena Mouskou, Costas Kemitzis or Julian Kyriakides". These individuals were all employees of the Offices of Tassos Papadopoulos; and
- ii. An examination of the banking records provided by the Republic of Cyprus by investigators from the Office of the Prosecutor reveals that many of the transactions conducted by this company were performed by, or done at the request of, Ms Borja Vucic.

Cabcom Marketing Limited

21. The Prosecutor has obtained the following information in relation to Cabcom: records provided by the Government of Cyprus disclose that:
 - i.
 - Cabcom was incorporated in the British Virgin Islands on 28 February 1997;
 - Under Cypriot law, as Cabcom is incorporated in a foreign jurisdiction there is no requirement to forward the names of the beneficial owner(s) of the company to the Central Bank of Cyprus;
 - Bank accounts for Cabcom were opened with the Cyprus Popular Bank Ltd by the law firm Tassos Papadopoulos; and

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The signatories to these bank accounts were "Marios Ellides or Kyriakos Theorides together with any one of Elena Mouskou or Juliana Kyriakides". These individuals were all employees of Tassos Papadopoulos.

27. Based on the information set forth in this request the prosecutor believes that:
- Slobodan Milošević was the overall architect of the financial and economic transfer of money from the government of the FRY;
 - He directed certain financial activities and required a closely-knit group to carry out his financial plans;
 - Three individuals who worked closely with Milošević in his financial directives were Nikola Šainović, Borka Vučić and Mihalj Kertes, all of whom were directly associated with the accounts described herein;
 - At the behest of the Milošević regime, Ms Borka Vučić sought legal counsel of the law offices of Tassos Papadopoulos to establish the eight named companies described in paragraph 13 and to open bank accounts for these companies with the Cyprus Popular Bank in Cyprus and the European Popular Bank in Greece;
 - The nominated owners of the eight named companies had no knowledge of the companies they owned nor the financial transactions these companies performed. This was done so that the true owners and controllers of those companies could not be easily established;
 - The de facto controller of these named companies and the SDF and the financial transactions undertaken by these companies was Ms Borka Vučić. The de facto owner of the companies was the Milošević regime;
 - The funds transferred to bank accounts held in the name of the named companies came from funds under the de jure control of the Central Bank of Yugoslavia but under the de facto control of the Milošević regime;
 - The transferred funds also included customs receipts from the Republic of Serbia and the Federal Republic of Yugoslavia, illegally diverted by Kertes at the direction of Milošević for the use of special un-named groups; and

CONFIDENTIAL

14

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The purposes behind the setting up of the eight named companies and the opening of bank accounts by these entities in Greece and Cyprus was to provide untraceable money for the benefit of Milošević and others and to provide funding for people of Serbian descent living in the Republic of Bosnia and Herzegovina and the Republic of Croatia.

- 23 The Prosecutor believes that an examination of the records maintained by the law office of Tassos Papadopoulos relating to the incorporation of the eight companies named in paragraph 13, Cybenco Trading Limited and Beogradska Banka a.d. and its subsidiary Beogradska Banka d.d Cyprus Offshore Banking Unit (BB COBU) will provide further evidence of the Milošević regime's wartime funding arrangements, including funding of the Armies of Srpska and the Army of the Republic Srpska Krajina and paramilitaries.

THE PROSECUTOR THEREFORE REQUESTS THAT the relevant authorities of the Republic of Cyprus provide to her, within 60 days of the date of this Request, copy of the following documents:

- i. Copies of all documents, including documents that are kept in electronic format, that are:
 - located within the law offices of Tassos Papadopoulos and Co.;
 - or
 - were sent to the law offices of Tassos Papadopoulos and Co., or
 - were prepared by personnel associated with the law offices of Tassos Papadopoulos and Co., including, but not limited to the personnel: Ms Nairy MERHEJE, Mr Pambos IOANNIDES, Mr Marios ELIADES, Mr Theodoros PANAYIDES, Mr Nicos PAPAEPSTATHIOU, Ms Elena MOUSKOU, Mr Costas KEMITZIS or Ms Juliana KYRIAKIDOU;
- and**
- relate to, any of the following companies ("the companies") or persons ("named persons");
 - Antexol Trade Ltd,
 - Browncourt Enterprises Ltd
 - Cabcom Marketing Ltd
 - Hillsay Marketing Ltd
 - Lamoral Trading Ltd
 - Southmed Holdings Ltd
 - Vericon Management Ltd
 - Vantervest Overseas Ltd
 - Cybenco Trading Ltd

CONFIDENTIAL

15

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in context below

- Beogradska Banka d. d. (Cyprus Offshore Banking Unit (BB COBU))
- Beogradska Banka a. d.
- Ms Borka Yucic
- Ms Ljiljana Radenkovic
- Ms Radmila Budisin
- Ms Zagorka Corovic
- Olga Nikic

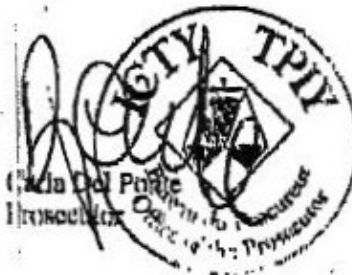
AND

Relate to the period 1 January 1990 until 31 December 2000.

Documents specifically sought by this request include, but are not limited to, copies of:

- A. instructions related to the above named companies or individuals received by or sent to the law offices of Tassos Papadopoulos and Co concerning:
 1. the incorporation of the companies;
 2. opening related bank accounts;
 3. conducting related financial transactions;
 4. naming or identifying an individual as a beneficial owner;
 5. changing the name of the nominated beneficial owner;
 6. dissolving or liquidating the companies;
 7. the identity of all individuals who provided instructions to instigate or defend law suits on behalf of the named companies
- B. notes or records kept in relation to the companies or named persons, including:
 1. minutes of meetings;
 2. diary notes;
 3. telephonic notes;
 4. correspondence;
- C. billing records in relation to work connected with the companies or named persons.

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