

From: "Marc.Kensington" <[REDACTED]>
To: Karyna Shuliak <[REDACTED]>
Cc: Alex Peto <[REDACTED]>
Subject: Re: Bin Palace
Date: Tue, 26 Feb 2019 14:42:21 +0000

Dear Karyna,

You are right, the world has changed. I am afraid not being able to provide the requested tax opinion. The vendor is not an actor and Christie's is not allowed to act as a lawyer. This should be the job of your lawyers and will take time. This is the reason why the final contract is not signed with the other potential buyers. They might need half a month or more to finish their due diligence.

The BVI mother company of Pamur will receive the funds. It's bank is LGT Bank in Vaduz as mentioned in my last mail. The contract will be signed by the trustee of the BVI company. We are aware that the money laundering regulation requests that buyer and vendor are clearly identified. This is not a problem and the vendors bank is asking same information.

About the 6 years old title deed, I just applied to get a new one. Our notary checked it online (access only for notary): it is still clear. Anyway, a title deed with the exact date of the transaction is requested and will be provide.

Kindest regards

Marc LEON

Partner

KENSINGTON

Luxury Properties Sarl

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Le sam. 23 févr. 2019 à 17:44, Karyna Shuliak <[REDACTED]> a écrit :

Dear Marc,

Thank you for your response.

EFTA00552188

1. To fully research the potential undisclosed liabilities of pamur will take time.
2. Is your vendor willing to provide a tax opinion that no tax is owed on transfer or capital gains and there is no obligation or disclosure of money being received outside of Morocco when the only asset is Moroccan?
3. Is your firm or Christies willing to stand behind the transaction, re title, or tax guarantees, employment, agriculture or any local or state claim?
4. If not, what structure can you propose that doesn't obligate us to accept a property and a company with unknown claims and virtually unlimited liability?
5. The property title deed you sent only shows no liabilities as of 6 years ago?
6. Where do you expect the money to be sent?and to what entity? BVI, Lichtenstein, who signs on behalf of this transaction?
7. I assume you are aware that under new intl banking regulations, the ultimate owner, ie your vendors name will most likely be required to be disclosed (anti money laundering, sanctions, tax disclosure). The world financial system has changed since your vendor built this property. Look forward to your suggestions and answers. Your fees would be paid to the company or to your firm directly?

Thank you.
Best regards,
Karyna

> On Feb 22, 2019, at 11:11 AM, Marc.Kensington <[REDACTED]> wrote:

>

> Dear Karyna,

>

> You will find attached some documents of the property Bin Ennakhil in Marrakech:

>

> - Statutes of Pamur Anstalt SA Liechtenstein

> - Titre deed of the property in Marrakech owned by Pamur Sa

> - Building permit

> - Residential permit

>

> The vendor offers the following procedure

>

> - Formal binding offer for the purchase of Pamur Anstalt shares, subject to a full due diligence

> - Please confirm also our fees

> - Transfer of a 10 % deposit on an escrow account of The Haze Trust to open at LGT Bank Vaduz

> - Reception of all the legal documents of Pamur Anstalt SA and it mother company

> - The staff in Marrakech is employed by a tiny Moroccan company that should also be checked

> - Due diligence of Pamur, it mother company and the local tax statement of Pamur in Morocco (a notary can provide a quitus fiscal, which means that all the taxes are paid)

> - The vendor doesn't want to provide a liability guarantee. Therefor he reduced his sale price

>

> Could you please confirm that this way to procede is appropriate ?

>

> Yours sincerely

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>

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> <Residential permit.pdf>

> <Building permit.pdf>

> <Property title deed.pdf>

> <Pamur Statutes.pdf>