

THE REPUBLIC OF SLOVENIA
THE LOCAL COURT IN LJUBLJANA

Mali trg 6, Ljubljana
CRIMINAL DEPARTMENT

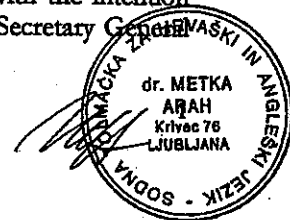
Case No.: I Kpd 90/2006
Date: October 27th, 2008

SUBJECT: Request to the competent authorities of the American federal state of Delaware for information and documentation on founders, current shareholders and proxies of the off-shore company GNN INC. 2316 Baynard Boulevard, Wilmington, Delaware USA.

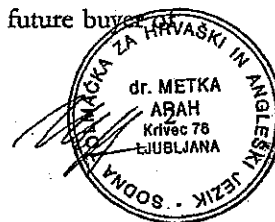
There is a pre-trial criminal process in course against the suspect Mirko Jelenič, born on [REDACTED] a citizen of the Republic of Slovenia, having permanent residence in [REDACTED] The Republic of Slovenia, and against the suspect Janko Jurca, born on [REDACTED] a citizen of the Republic of Slovenia, having permanent residence in [REDACTED]

[REDACTED] The Republic of Slovenia, based on the requirement for particular investigative acts of the District State Prosecutor's Office in Ljubljana, No. Kt (1) 2849/06, from February 5th, 2007. Mirko Jelenič is suspected of committing two criminal offences of criminal support at committing the criminal offence of breach of trust under the first paragraph of the Article 220 of the CC with reference to Article 27 of the CC.

There exists a reasonable suspicion that Mirko Jelenič as a representative of the economic interests of another person, misused the power with the intention that another person gains economic benefit, as he has, as a Secretary General

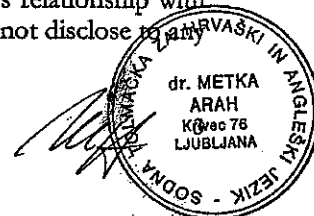


of the Slovenian Red Cross (SRC) being responsible under Article 3 of the Individual Contract on Employment and under Article 38 of the Statute of the Slovenian Red Cross for a lawful operation and as a person in charge for executing the financial plan of the SRC, thereby having competence and liability for usage of financial means and for execution of the actual payments and, consequently, being authorised for representing economic benefits of the SRC, concluded a contract on business cooperation No. RK-GNN 1/2000 from April 3rd, 2000 with an off-shore company GNN Inc, Delaware, USA (GNN Inc), and an annex to this contract from May 30th, 2000, in relation to the real estate agency and other services, and afterwards by concealing data and pieces of information from the members of the Main Committee of the SRC, he also never explicitly informed members of the Supervisory Committee on the concrete business deal with the company GNN Inc, and by taking advantage from the confidence they had in him due to his capacity of secretary general of the non-profit humanitarian organisation, as well as the circumstance that he himself actually took decisions on all important matters in SRC, while his decisions were subject to only formal confirmation by committees of the SRC, he did mislead the members of the Main Committee of the SRC, that in relation to the company GNN Inc it dealt with an actual and actually executed business deal of the real estate agency in realization of the sale of the piece of land by Klinični center, k.o. Šentpeter, because of which on February 27th, 2001, they adopted a resolution of acceptance of his report on realization of the activities on the sale of the piece of land and to sign and execute the contract with GNN Inc, although in relation to the money order for commission he knew that the company GNN Inc did not comply with the contractual obligations and did not engage in research for SRC and did not make any market analysis referring to the search for the most favourable buyer of the piece of land at Klinični center, k.o. Šentpeter, respectively, and did not contribute that, based on the deed of sale from December 7th, 2000, the piece of land was bought by ALSLORK d.o.o., given that the buyer, ALSLORK d.o.o., the vendor, SRC, and a co-founder of the vendor, SLORK d.o.o., were connected and interdependent subjects, having the same representatives in the bodies of the said subjects, with a seat at the same address, in spite of knowing it in a moment of signing the contract between SRC and GNN Inc, that to GNN Inc it was an apparent and fictitious business deal, respectively, as searching and contacting potential buyers was carried out by himself and by Janko Jurca, respectively, as assistant manager of the company SLORK d.o.o., of which he himself was a general manager, and for which it was clear until May 4th, 2000 at the latest, that they intended to establish, together with a company Alpine Baugesellschaft m.b.H., representatives of which came to negotiations directly on the seat of SRC and SLORK d.o.o., a future buyer of



the piece of land, the company ALSLORK d.o.o., because of which the agency of searching for the buyer from the side of the off shore company GNN Inc was not necessary at all and did not take place, whereby it could not be entitled to a payment of the commission, in June of 2001 did order the employees of SRC Darja Horvat and Marjanca Vukadinovič, following his order, for paying an invoice of the company GNN Inc No. 8027-1G/GNN, to sign a transfer order dated June 13th, 2001, wherefore there was, on the same day, from the account of the Slovenian Red Cross, to the account of GNN Inc opened at Kreditbank Ferlach in Klagenfurt, transferred the amount of 250.000,00 DEM (in counter value of 27.907.575,00 SIT and 116.456,25 EUR, respectively), and with such an action Mirko Jelenič on June 16th, 2001, gained for the company GNN Inc an economic benefit in the amount of 250.000,00 DEM (in counter value of 27.907.575,00 SIT and 116.456,25 EUR, respectively) and it was his intention to acquire it, whereby he impaired the Slovenian Red Cross for the stated amount.

There exists a reasonable suspicion that Janko Jurca intentionally assisted Mirko Jelenič at committing the criminal offence as described above, when he gave at his disposal the means for performing the criminal offence and, during its performance, concealed the criminal offence and instruments by which it had been performed, and the traces of the criminal offence as he, in capacity of the assistant manager in the company SLORK d.o.o., the general manager of which was Mirko Jelenič, and as a proxy in the company ALSLORK d.o.o., but above all as a member of the Executive and Main Committee of the Slovenian Red Cross, in the period of the criminal offence described above, when Mirko Jelenič kept members of the Executive and Main Committee of the Slovenian Red Cross informed and administered misleading and incomplete reports on the course of the sale of the piece of land, he supported his statements in front of the other members and concealed the circumstance that the whole procedure of selling the piece of land was actually conducted by them themselves, with Mirko Jelenič through the company SLORK d.o.o. and that the contract on business cooperation with the company GNN Inc represents a fictitious contract wherefore the agency and searching for the buyer by the off shore company GNN Inc was not at all necessary and did not take place, whereby it could not be entitled to the payment of the commission, however, with such actions from the point of view of his function that he had in companies SLORK d.o.o. and ALSLORK d.o.o. and as a member of the committees in SRC and, consequently, with an access to all the relevant data in relation to the procedure of selling the piece of land, knowing all the subjects collaborating in it and information on the fictitious business relationship with the company GNN Inc and its actual owners, whom he did not disclose to any



other member of the SRC, he intentionally assisted him so that Mirko Jelenič could, in June 2001, on the ground of their previous activities, order a payment of the commission to the company GNN Inc in the amount of 250.000,00 DEM (in counter value of 27.907.575 SIT and 116.456,25 EUR, respectively), which was from the side of employees of the Red Cross Darja Horvat and Marjanca Vukadinovič, on the basis of the signed payment order from June 13th, 2001, executed on the same day.

In relation to the foregoing and due to the necessities of this pre-trial criminal proceeding we request on the basis of reciprocity to provide us data and documentation on the founders, current share holders and proxies of the off-shore company GNN INC. 2316 Baynard Boulevard, Wilmington, Delaware, USA.

We look forward to your prompt reply and thank you for your cooperation.

Respectfully,

The Judge of the Local Court:
Marko Češnovar

(The Seal: The Republic of Slovenia,
Local Court in Ljubljana)

(signature - illegible)

Enclosure:

- Extract from the provisions of the Criminal Code being used in this criminal case;

