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District Public Prosecutor's Office
in Koszalin
ul. Gen. Władysława Andersa
75-950 Koszalin

Warsaw, August 18th, 2006

file no: V Ds. 12/05
V Oz 18/05

REQUEST
of the District Public Prosecutor in Koszalin
for legal assistance in a criminal case

District Public Prosecutor's Office in Koszalin investigates the case no. V Ds. 12/05 regarding measures taken in 2004 that could have prevented or significantly disturb confirmation of criminal origin of at least PLN 1,000,000 by "Vlad Vladyslav Hubenko" based in Koszalin, ul. Korczaka 2a, and in case of avoiding the taxation by Vladyslav Hubenko – i.e. crime under article 299 paragraph 1 of the Criminal Code and article 54 paragraph 1 of the Fiscal Code (Attachment No. 1).

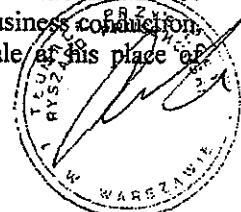
According to the evidence gathered so far, Kredyt Bank S.A. kept personal accounts for Vladyslav Hubenko (in PLN and in USD).

According to the analysis of banking personal accounts of Vladyslav Hubenko, until September 2004 these accounts were not used. Since September 2004 until the end of December 2004, one of them, kept in the USA was credited by assets from Hunter Universal LLC, 15 East North Street Dover de, 19901 Kent (United States of America), as "payment for consulting and marketing services". The total amount of the money transferred amounted to USD 373,707.80. The Latvian bank RIETUMU BANK based in Riga kept the account of Hunter Universal LLC, and Chase Manhattan Bank was the intermediary in assets transfer. At the same time the said account was credited by assets from Balmoral Import and Export LLC (to this end we have prepared a separate request for legal assistance in a criminal case no. DOJ 182-23513). The assets gathered were in part paid Vladyslav Hubenko in cash, and partially transferred to his personal account kept in PLN, for the purpose of further transfers of established businesses operating in Poland.

The probability of the occurrence of crime involving money laundering and taxation crimes is justified by numerous transfers of assets from abroad coming from unclear sources, very brief payment titles, frequent cash out-payments of the money transferred, transfers of assets from personal accounts for business payments.

The findings of the investigation also indicate that since April 2002 Vladyslav Hubenko has been conducting business "Vlad Vladyslav Hubenko" in Koszalin, ul. Korczaka 2. For the purpose of the Revenue Office in Koszalin, the scope of the business was established as "wholesale, market research".

Comparison of the revenue notified with the Revenue Office with the assets circulation in the accounts kept in PLN in favor of "Vlad Vladyslav Hubenko" in Koszalin shows significantly larger turnover of assets in the said accounts (about PLN 1,000,000). It should also be emphasized that Vladyslav Hubenko achieved high revenues during his business operation, without any employment agreements, as well as conduction of wholesale of his place of



residence, where the company is based. The aforesaid circumstances prove that the notified value of the due goods and services tax has been underestimated, the actual revenue has been concealed irrespective of conduction of business to a large extent.

This justifies the suspicion of money laundering in two ways. The first way involves the "fictional account" method, i.e. opening of an account for the purpose of a small number of transactions with large amounts in a short time. Until September 2004, both personal and business accounts of Vladyslav Hubenko seemed frozen, and afterwards there were numerous transactions made on them, involving large even amounts.

The other method involves "mixing" of revenue coming from illegal sources with that from legal transactions. Part of the financial flows in these accounts seem authentic, especially those involving payments for the goods. Simultaneous acceptance of payments to the personal accounts and their further transfer to the accounts of variable companies under very brief payment titles raise doubts and indicates to an intent of concealing of the actual turnover on the accounts.

Therefore, to clarify the significant circumstances of the case, please gather information about **Hunter Universal LLC, 15 East North Street Dover de, 19901 Kent (United States of America)** in particular the following:

1. Since when has this business been operating?
2. What is the object of its business?
3. Does Hunter Universal LLC cooperate with Vladyslav Hubenko, or "Vlad Vladyslav Hubenko" based in Koszalin?
4. What is the nature of cooperation between the aforementioned companies?
5. Whether during the period between September 2004 and the end of December 2004 Hunter Universal LLC transferred any assets to Poland, to the account of Vladyslav Hubenko, if so, how many times, what was the amount concerned, and under what title?

Obtaining information about Hunter Universal LLC, based in the United States of America, 15 East North Street Dover de, 19901 Kent and about its possible relations with Vladyslav Hubenko is necessary to evaluate the material collected so far.

Attachment: 1 on 1 page

Yours sincerely,

Deputy District Public Prosecutor
Marian Ślizień
(-) *signature illegible*

Round official stamp with the national emblem of the Republic of Poland inside, and the following circumscription: District Public Prosecutor's Office in Koszalin

WZ/EJ

