

Darren Carabott

From: Karl Cini - Nexia BT <karl.cini@nexiabt.com>
Sent: Wednesday, 21 October 2015 18:32
To: Mossack Fonseca & Co. (New Zealand)
Cc: Leydelises de Mossack - LTS Consultant; Juan Carlos Martínez - Executive Assistant; Luis Quiel - Lawyer
Subject: RE: TILLGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Working on that

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Regards

Karl Cini

Partner | Tax and International Client Services

Nexia BT

The Penthouse, Suite 2, Capital Business Centre, Entrance C, Triq taz-Zwejt, San Gwann
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From: Mossack Fonseca & Co. (New Zealand) [mailto:NewZealand@mossfon.com]

Sent: 20 October 2015 17:54

To: Karl Cini - Nexia BT

Cc: Leydelises de Mossack - LTS Consultant; Juan Carlos Martínez - Executive Assistant; Luis Quiel - Lawyer

Subject: RE: TILLGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Hi Karl,

Can we also have the letter for Mr. Mizzi and wife?

Saludos / Kind regards,

Daniel León

Executive Assistant

MOSSACK FONSECA & CO. (NEW ZEALAND) LIMITED



From: Karl Cini - Nexia BT [<mailto:karl.cini@nexiabt.com>]

Sent: martes, 20 de octubre de 2015 10:15 a.m.

To: Mossack Fonseca & Co. (New Zealand)

Cc: Leydelises de Mossack - LTS Consultant; Juan Carlos Martínez - Executive Assistant; Luis Quiel - Lawyer

Subject: RE: TILGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Hi Daniel

Attached

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Regards

Karl Cini

Partner | Tax and International Client Services

Nexia BT

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From: Mossack Fonseca & Co. (New Zealand) [<mailto:NewZealand@mossfon.com>]
Sent: 20 October 2015 15:13
To: Karl Cini - Nexia BT
Cc: Leydelises de Mossack - LTS Consultant; Juan Carlos Martínez - Executive Assistant; Luis Quiel - Lawyer
Subject: RE: TILGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Hi Karl,

Can we have a signed copy of the letter before the end of your business day?

Saludos / Kind regards,

Daniel León
Executive Assistant
MOSSACK FONSECA & CO. (NEW ZEALAND) LIMITED



From: Mossack Fonseca & Co. (New Zealand)
Sent: lunes, 19 de octubre de 2015 08:47 a.m.
To: 'Karl Cini - Nexia BT'
Cc: Leydelises de Mossack - LTS Consultant; Juan Carlos Martínez - Executive Assistant; Luis Quiel - Lawyer
Subject: RE: TILGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Dear Karl,

Many thanks for your email below.

Could you please let me have a signed copy of the proposed letter so that I can revert to our NZ director?

Saludos / Kind regards,

Daniel León
Executive Assistant
MOSSACK FONSECA & CO. (NEW ZEALAND) LIMITED



From: Karl Cini - Nexia BT [<mailto:karl.cini@nexiabt.com>]
Sent: sábado, 17 de octubre de 2015 11:33 a.m.
To: Mossack Fonseca & Co. (New Zealand)
Cc: Leydelises de Mossack - LTS Consultant; Juan Carlos Martínez - Executive Assistant; Luis Quiel - Lawyer
Subject: RE: TILGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Dear Daniel

I obtain clarification on the intended operations of the underlying companies. In essence the panama companies will be used as holding companies for operations that will be conducted in the sectors of :

- Recycling
- Remote gaming

These underlying entities will be set up in other jurisdictions and the panama company will have a part stake in these entities. Recycling business will be undertaken in India, Dubai and other Gulf countries. I wish to bring to your attention that the UBO was already involved in such activities before his political appointment.

Funds for these operations will come from existing profits generated from the UBO's business, to which I already referred to in my earlier explanations.

Re comfort letter would the following be acceptable for the purposes of providing additional comfort as to the source of funds ?

Dear Sir

I write in relation to your request for comfort on the source of funds of Mr. Keith Schembri. We can confirm that we have been acting as auditors of Mr. Schembri's group of companies for 20 years acting also as his personal tax advisor. In this regard we can confirm that all tax declarations for both the group of companies and Mr. Schembri personally have been filed and the audit reports of the companies were always unqualified.

We are confident that the funds generated by Mr. Schembri's business and reflected in all tax declarations over the years are more than sufficient to substantiate the investment that is being purported to be made in the various activities indicated in our correspondence.

Should you require any additional assistance please do not hesitate to contact us.

Regards

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Regards

Karl Cini

Partner | Tax and International Client Services

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From: Mossack Fonseca & Co. (New Zealand) [<mailto:NewZealand@mossfon.com>]

Sent: 08 October 2015 16:38

To: Karl Cini - Nexia BT

Cc: Leydelises de Mossack - LTS Consultant; Juan Carlos Martínez - Executive Assistant; Luis Quiel - Lawyer

Subject: RE: TILGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Hi Karl,

It has been a while since your last email relating to these trusts, so hope all is going well with you.

When do you think we may receive the requested additional information/documentation? We are delayed with the filing of the IR607 forms of these trusts with Inland Revenue, and we are also afraid that the proof of address documents may be expiring in the interim.

We appreciate your prompt comments, and hope we can finalize this soon.

Many thanks and best regards,

Daniel León

Executive Assistant

MOSSACK FONSECA & CO. (NEW ZEALAND) LIMITED



MOSSACK FONSECA

From: Mossack Fonseca & Co. (New Zealand)

Sent: jueves, 17 de septiembre de 2015 09:48 a.m.

To: 'Karl Cini - Nexia BT'

Cc: Leydelises de Mossack - LTS Consultant; Juan Carlos Martínez - Executive Assistant; Luis Quiel - Lawyer

Subject: RE: TILGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Many thanks Karl!

Saludos / Kind regards,

Daniel León

Executive Assistant



From: Karl Cini - Nexia BT [<mailto:karl.cini@nexiabt.com>]
Sent: jueves, 17 de septiembre de 2015 09:33 a.m.
To: Mossack Fonseca & Co. (New Zealand)
Cc: Leydelises de Mossack - LTS Consultant; Juan Carlos Martínez - Executive Assistant; Luis Quiel - Lawyer
Subject: RE: TILGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Noted Daniel.

I am working to get a full picture of the intended operations.

Regards

Karl Cini

Partner | Tax and International Client Services

Nexia BT

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From: Mossack Fonseca & Co. (New Zealand) [<mailto:NewZealand@mossfon.com>]

Sent: 17 September 2015 15:44

To: Karl Cini - Nexia BT

Cc: Leydelises de Mossack - LTS Consultant; Juan Carlos Martínez - Executive Assistant; Luis Quiel - Lawyer

Subject: RE: TILGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Hello Karl,

I hope this email finds you well.

Is it possible that while decision is taken in respect to the banks, we receive the missing information/documentation asked below by our NZ Lawyer so that we can go ahead and file the IR607 forms for both trusts with Inland Revenue?

The trust deeds were signed on 22 July 2015, and the trustee is obliged to file the above-mentioned forms within the next 30 days as of the execution of the deeds, but for that, the Due Diligence must be in order and approved.

We thank you for your kind assistance, and look forward to hearing from you.

Best regards,

Daniel León

Executive Assistant

MOSSACK FONSECA & CO. (NEW ZEALAND) LIMITED



MOSSACK FONSECA

From: Mossack Fonseca & Co. (New Zealand)

Sent: viernes, 04 de septiembre de 2015 09:19 a.m.

To: 'Karl Cini - Nexia BT'

Cc: Leydelises de Mossack - LTS Consultant; Luis Quiel - Lawyer; Juan Carlos Martínez - Executive Assistant; Adrián Dixon - Executive Officer

Subject: RE: TILGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Hi Karl,

I hope this email finds you well.

We have sent all the certified Due Diligence documentation to our NZ Director, and his comments are as follow:

“We look forward to receiving the further information in respect of the joint venture that the two settlors will be entering into, together with your advice in respect of the source of funds that will be introduced to this structure. Whenever a PEP is involved, it is important that due diligence is conducted on the source of funds, irrespective of the level at which these funds are introduced, and to identify any funds that may be connected to the PEP’s political activities or role. As the profits from the joint venture will be the source of funds for the trust structure, it is important that we receive full details in respect of the funds that will be introduced into the joint venture, and also details of the amounts that will be settled”

Besides the above, we will require a letter from Nexia BT confirming that due diligence has been conducted on the source of funds e.g. that you are satisfied that they have been included in the relevant tax declarations in the relevant jurisdiction; that you are confident that the position of KM’s wife n was an arm’s length appointment, and that we do not need to be concerned by her appointment.

Having all the above elements I think we should have fulfilled the Due Diligence requirements from our NZ Director.

We thank you for your kind assistance, and look forward to hearing from you soon.

Many thanks and regards,

Daniel Leon
Executive Assistant
MOSSACK FONSECA & CO. (NEW ZEALAND) LIMITED



From: Karl Cini - Nexia BT [<mailto:karl.cini@nexiabt.com>]
Sent: sábado, 29 de agosto de 2015 08:11 a.m.
To: Mossack Fonseca & Co. (New Zealand)
Cc: Leydelises de Mossack - LTS Consultant; Luis Quiel - Lawyer; Juan Carlos Martínez - Executive Assistant
Subject: RE: TILGATE INC./ 2438957/ HEARNVILLE INC./ 2438996/ LQ/ jcm.

Dear Daniel

Below please find my comments in relation to the questions put forward by the Trustees.

Negative publicity regarding the amount of remuneration for KM's wife

As you might expect, there will always be 'attacks' made on ministers by the opposition party. The appointment of Ms. Mizzi, which was made by the Prime Minister, was confirmed by Malta Enterprise, which is the Maltese entity responsible for inward investment into Malta.

In a statement, Malta Enterprise said that Sai Mizzi is an Envoy of the Maltese Government with responsibility for promoting Asian investment in Malta and Maltese exports to the same region. She was engaged on August 26 for a definite period by Malta Enterprise. The countries she will target include China, Japan, South Korea, Indonesia, Malaysia, Thailand, Vietnam and Singapore.

She operates mainly from Shanghai. She is not involved in any energy related projects

"Envoys are not appointed through public calls. This is in fact not the first time that a Maltese government has appointed a special envoy with a specific mission related to investment promotion, nor is it the first time that these envoys were contracted through Malta Enterprise. Her salary and conditions are in line with those applicable in Malta's foreign service," Malta Enterprise said.

It said that Mrs Mizzi, who is a Maltese citizen, holds a first degree in International Trade from Dalian, China, pursued postgraduate studies at the Beijing Foreign Language University and has a Master's degree in Investment and Finance from the University of Nottingham.

She specialises in business development, international investment and trade promotion, market research and project management.

She has in the past developed business plans in various industrial sectors to access the Asian markets and also supported the development of tourism promotion.

A few years ago, Mrs. Mizzi had also project managed the first version of the Visit Malta websites for the Japanese and Chinese markets. She also carried out market analysis for international companies pursuing opportunities in China and in Asia. She worked with Big Four audit companies for a number of years as well as with international export firms in Asia and Europe.

There were no enquiries made in this regard, but simply political references made by the opposition party. Mrs. Mizzi still holds such a post with Malta Enterprise.

Source of funds for Rotorua Trust

As also explained in the CV of KM, he was for many years involved in professional services both locally and abroad, as a partner in a firm. As a point of clarification, the underlying entity of the Trust is still non-trading and hence no major funds are expected to be directly 'put' into the trust, but only funds generated by this underlying entity will be eventually channeled into the Trust.

Negative coverage regarding the tender process for supply of paper to the government shortly after the settlor's appointment as Chief of Staff

As you may see in the CV submitted for KS, he is a shareholder in the largest paper wholesaler on the island with over 75% of the market. He has been in this business since 1995, a business which generates over Eur10million in turnover per annum. His company has been winning tenders for the supply of paper way before the recent change in Government (2013) when he became chief of staff. While he has of course, for political reasons, stepped down from any director position, he still holds his shareholding in this group of companies.

It is hence expected and justifiable that such a leading company would win such a tender. The strength of the business also amply justifies the source of funds that will be put into the Trust). As a point of clarification, the underlying entity of the Trust is still non-trading and hence no major funds are expected to be directly 'put' into the trust, but only funds generated by this underlying entity will be eventually channeled into the Trust.

Activities of the underlying entities

Both KS and KM will be involved as shareholders in a structure that is totally not related to their areas of work. The underlying entities of the Trusts will hence act as a vehicle of extracting the profits from this venture, since from a commercially sensitive perspective they cannot appear as direct shareholders, either personally or via holding entities. I want to stress the fact that under our legislation, PEPs are openly allowed to hold shareholdings in other businesses, as I believe is also the case in most modern jurisdictions. I am currently compiling a more detailed structure of the activities of the mentioned structure and the relative flow of funds up to the Trust.

While I hope that the above provides the required clarifications please do not hesitate to contact me if you require anything else.

Regards

Karl Cini

Partner | Tax and International Client Services

Nexia BT

The Penthouse, Suite 2, Capital Business Centre, Entrance C, Triq taz-Zwejt, San Gwann
SGN3000, Malta

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