

WALCH & SCHURTI

ATTORNEYS AT LAW LTD
RECHTSANWALTE A G

ERNST .J. WALCH, DR. JUR., MCJ¹
ANDREAS SCHURTI, DR. JUR. HSG, MCL, HEE¹
ALEXANDER APPEL, DR. JUR., LL.M.²
MORITZ BLASY, DR. JUR., LL.M.^{2,3}
MARINA A. HAASE-SAIDANI⁴
ANDREAS VOGEL, DR. JUR.²

WOLFGANG FURNSCHUSS, MAG. JUR.²
MARION KRANZ, W.AG. JUR.²
BARBARA WALCH, DR. JUR., LL.M.²

- ¹ also admitted to the New York Bar
² also qualified in Austria
³ also admitted as Solicitor (England and Wales)
⁴ Rechtsanwältin in Deutschland

ZOLLSTRASSE 2
P.O.B. 1611
FL-9490 VADUZ
LIECHTENSTEIN

WWW.WALCHSCHURTI.NET

TELEFON +423 237 20 00
+41 81 750 11 90

TELEFAX +423 237 21 00
+41 81 750 11 91

Handelregister des Fürstentum Liechtenstein
Resistenznummer: 0002.490.382-4

By Courier

10 July 2015
EJW/AVO/ gka

Holtz, Slavett & Drabkin
Igor S. Drabkin, Esq.
315 S. Beverly Dr., Suite 515
Beverly Hills, CA 90212
U.S.A.

Also by Telefax

No. : +1 310 774-3904

Dear Colleague:


In the above-mentioned matter enclosed please find the Final Order of the Liechtenstein Tax Administration in the administrative assistance proceedings in tax for the U.S. Department of Justice (DOJ) regarding your client and Ingelo Foundation. The Liechtenstein Tax Administration will grant administrative assistance and send documents regarding Ingelo Foundation to the DOJ.

We are sending you the Final Order on behalf of our client Orbis because the Liechtenstein Tax Administration has requested our client to forward a copy to your client.

As explained in our letter to your client of 2 June 2014, it is the policy of our client to advise clients to participate in the Offshore Voluntary Disclosure Program (OVDP) to resolve pending tax issues, if any. Apparently your client has indeed participated in the OVDP. Hence, we assume that she does not oppose the transfer of documents to the DOJ.

If you have any questions, please do not hesitate to contact my partner Dr. Ernst Walch or the undersigned.

Sincerely yours,
Walch & Schurtti Attorneys at Law Ltd


(Dr. Andreas Vogel)

Enclosure: mentioned