

September 12th, 2022

Ms. Brenda Medina
International Consortium of Investigative Journalists
1800 M Street, N.W. Front 1 # 33019
Washington, DC 20033
United States of America

Dear Ms. Medina,

This communication is in reply to your letter of September 2, 2022.

Although industry standards have changed over the years, and thus we are constantly improving our AML/CFT manual, policies and procedures, the distinctive record of this firm and our conspicuous absence from negative news, as a preponderance of investigative reports have shown, are not fortuitous. They reflect the sound and conservative practices that we have consistently strived to apply over decades in managing client relations. It is a record that we are proud of; and a reputation earned with dedication.

In line with applicable laws and regulations, our AML/CFT manuals and policies apply a risk-based approach to customer due diligence. Client risk is assessed using a scoring model and methodology that weigh several risk factors, including types of client and structures, types of business or industry sector, association to politically exposed persons, and geographic footprint, among others. Our CDD processes and procedures require us not only to obtain information directly from clients, but also to use search tools, such as World-Check and other means, to independently verify information provided by clients.

In the case of higher-risk businesses, it is not infrequent for us to further seek the advice or opinion of independent and reputable colleagues in the jurisdiction of the client, as part of an enhanced due diligence process. Client risk is assessed at the time of on-boarding, and periodically thereafter, by licensed Compliance Officers, using a risk scoring model. Political factors and loss of business opportunities play no role at all in our decision to accept, maintain or terminate a client relation; on the contrary, politically exposed persons are immediately considered high-risk clients and subject to enhanced due diligence. Asserting or implying otherwise, in writing, would be a libelous statement.

We fully cooperate with competent authorities in all requests of information, and suspicious activities reports are timely filed by our Compliance Officers directly with regulators, as required by applicable laws and regulations.



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To your question, we have no relations with Farkit Trading Corporation, Bombo Holdings Corp, Foucher Holding Inc or Fundación Colchagua since mid-2010, when we ceased to act as registered agent of these entities, as evidenced in public filings.

It is information of public record that Farkit Trading Corporation was incorporated in 1985. And, although we are not allowed to address specifics of your questions, we can state that our CDD records do not reflect a relation between this corporation and any individual mentioned in your letter at that time.

Our CDD records are kept in compliance with applicable laws and regulations, as they have evolved over time, and do not indicate that any of the above entities, or any of their respective directors, shareholders or beneficial owners were indicted or convicted of criminal charges involving: (i) money laundering, (ii) financing of terrorism, (iii) financing the proliferation of weapons of mass destruction, (iv) corruption of government officials or (v) tax evasion, during the time we acted as registered agent.

Although we are not allowed to address specifics of your questions, regarding your references to the year 2006, please note that public records indicate that, at that time, the focus of the businesses of the beneficial owners of the above entities was not in high-risk sectors.

Carlos Cardoen Cornejo is not a client of this firm.

Code of ethics and professional duties do not allow us to share any further information with you. We trust that you will use the information on this letter responsibly.

Yours truly,
ARIAS, FABREGA & FABREGA



Fernando A. Arias