

# **EXHIBIT 39**

Court File No. M48342, C63309, C63310  
Court File No.: CV-12-9808-00CL

**COURT OF APPEAL FOR ONTARIO**

BETWEEN:

DANIEL CARLOS LUSITANDE YAIGUAJE, BENANCIO FREDY  
CHIMBO GREFA, MIGUEL MARIO PAYAGUAJE PAYAGUAJE,  
TEODORO GONZALO PIAGUAJE PAYAGUAJE, SIMON LUSITANDE  
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PAYAGUAJE and DELFIN LEONIDAS  
PAYAGUAJE PAYAGUAJE

Plaintiffs/Appellants

and

CHEVRON CORPORATION, CHEVRON CANADA LIMITED and CHEVRON  
CANADA FINANCE LIMITED

Defendants/Respondents

**MOTION RECORD OF THE MOVING PARTY**

**DATE: October 10, 2017**

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**TAB 1**

Court File No. C63309, C63310  
Court File No.: CV-12-9808-00CL

**COURT OF APPEAL FOR ONTARIO**

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## **NOTICE OF MOTION**

**(Returnable October 11, 2017)**

**CERTAIN OF THE PLAINTIFFS**, represented by Peter Grant and Diane Soroka, will make a motion to the Court of Appeal on October 11, 2017 at 10:00 a.m. or as soon after that time as the motion can be heard, at Osgoode Hall Court House, 130 Queen Street West, Toronto, Ontario.

### **PROPOSED METHOD OF HEARING:**

The motion is to be heard:

- in writing under subrule 37.12.1(1) because it is;
- in writing as an opposed motion under subrule 37.12.1(4);
- orally

### **THE MOTION IS FOR:**

- (a) An order abridging the time for service and validating service of this notice of motion and motion record, if necessary, so that the motion is properly returnable on the date indicated above;
- (b) An order permitting the moving plaintiffs to adduce further evidence of their impecuniosity; and
- (c) Such further and other relief as this Honourable Court deems just.

### **THE GROUNDS FOR THE MOTION ARE:**

- (a) On September 21, 2017, Epstein JA, in chambers, ordered that the plaintiffs post security for costs for this appeal (the "Decision");
- (b) In the Decision, Epstein JA found that insufficient evidence of impecuniosity was led by the plaintiffs;
- (c) Rule 56.07 permits the court to review a decision on security for costs at any time;

- (d) Additional evidence is available demonstrating, on a balance of probabilities, that the moving plaintiffs are impecunious;
- (e) The Decision was premised on the assumption that the moving plaintiffs cannot demonstrate that they are impecunious;
- (f) The moving plaintiffs, due to their impecuniosity, will be unable to proceed with this appeal if they are required to post the substantial security for costs ordered by Epstein JA in the Decision and will likely result in the termination of this important litigation without a consideration of the merits or the justice of their case;
- (g) The moving plaintiffs, as they are impecunious, should be allowed to have their appeal decided on its merits rather than on the basis of a security for costs order that they cannot pay;
- (h) Rules 1.04(1), 1.04(2), 1.05, 2.01(1), 2.03, 37, 56.01, 56.05, 56.07, 61.06, and 61.16(2) of the *Rules of Civil Procedure*, RRO 1990, Reg. 194;
- (i) Section 134(4)(b) of the *Courts of Justice Act*, RSO 1990, c C.43; and
- (j) Such further and other grounds as counsel may advise and this Honourable Court may permit.

**THE FOLLOWING DOCUMENTARY EVIDENCE** will be used at the hearing of the motion:

- (a) The motion records on the motion to vary the order for security for costs filed by the parties before this Court;
- (b) The Affidavit of Patricio Salazar Cordova, sworn October 10, 2017 and exhibits thereto; and
- (c) Such further and other evidence as counsel may advise and this Honourable Court may permit.

**DATE: October 10, 2017**

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Appellants/Moving Party

-and-

**CHEVRON CORPORATION et al.**  
Respondents/Responding Party

Court File No.: M48342, C63309, C63310

**ONTARIO  
COURT OF APPEAL**

PROCEEDING COMMENCED AT TORONTO

**NOTICE OF MOTION**

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Hortencia Viveros Cusangua



**TAB 2**

Court File No. M48342, C63309, C63310  
Court File No.: CV-12-9808-00CL

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Plaintiffs/Appellants

and

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CANADA FINANCE LIMITED

Defendants/Respondents

**AFFIDAVIT OF PATRICIO SALAZAR CORDOVA**

I, Doctor Patricio Salazar Córdova, of the City of Cumbayá, Ecuador, MAKE OATH AND SAY:

1. I am a lawyer, licenced to practice law in Ecuador. I am fluently bilingual in English and Spanish.
2. I have been directly involved in this case since early 2015.
3. I am not authorized nor permitted to waive solicitor-client privilege, and nothing in the affidavit can be taken to constitute such a waiver.
4. I obtained my law degree from SEK International University, in Quito, Ecuador in July 1999.
5. I obtained my Doctor of Jurisprudence from SEK International University, in Quito, Ecuador in July 2000.
6. I also attended The University of Birmingham, UK, where I obtained an MBA in Public Service in December 2005.
7. I have been practicing law in Ecuador since July, 1999. Attached hereto and marked as Exhibit "A" is a true copy of my Curriculum Vitae.
8. I am also a member of the board of directors of the Quito Chamber of Commerce, and have held this position for approximately three years.
9. I am counsel for the Amazon Defence Front ("FDA") and the ten plaintiffs who have retained Peter Grant as counsel in Canada. Their other legal counsel, in Ecuador, are Angel Cajo, Agustin Salazar, and I work closely with them.
10. Since I have been working with the FDA, I have travelled to the Amazon region, where

the plaintiffs reside, on several occasions. I am familiar with the communities and the Amazon region from the time I have spent there with plaintiffs and other community members affected by the environmental pollution (“Affected People”).

11. Over the time I have spent with the Affected People in the Amazon region, it has become clear to me that all of them have very limited financial resources. I have met hundreds of Affected People on those trips and had community meetings. With few exceptions, the people live on subsistence existence. Many of the Affected People have dirt floors in their homes; they sleep on a mattress on the dirt floor; and they do not have insurance or access to medical treatment. They travel on dirt roads, and work in fields, with no access to an adequate water supply.
12. I also have meetings with representatives of the Affected People in Quito and Cumbayá on a weekly basis, as well as phone calls.
13. In Ecuador, information regarding income tax returns of individuals and entities are a matter of public record.
14. I have completed a search of the income tax filings of the forty-seven plaintiffs named in this matter. Two of the plaintiffs do not even have a taxpayer number, and thus they have not filed returns. Attached hereto and marked as Exhibit “B” are true copies of the ten plaintiffs’, who are my clients and that of Mr. Peter Grant, income tax searches completed on the *Servicio de Rentas Internas*, the website for the Internal Revenue Services in Ecuador. Attached hereto and marked as Exhibit “C” are true copies of the remaining thirty-seven plaintiffs’ income tax searches completed on the *Servicio de Rentas Internas*, the website for the Internal Revenue Services in Ecuador.
15. The search provides evidence that only three of the plaintiffs meet the threshold of

\$11,920 USD. Below that threshold, they are not required to file tax returns.

- 16. The table also shows any exit tax payable on any monies an Ecuadorian sends overseas, as a 5% exit tax is levied. None of the representative plaintiffs have sent money overseas, as no amounts are listed in the table.
- 17. There are three plaintiffs who have filed income tax returns, and therefore, they are above the threshold. However, they are very close to the threshold, as the top tax payable are is less than \$239 USD. Attached hereto and marked as Exhibit "D" is a true copy of the current threshold income tax table of Ecuador, setting out the tax payable for different incomes.
- 18. According to Ecuadorian law, to be eligible for a loan from any financial institution, an Ecuadorian would have to disclose his/her income tax declaration in order to prove a source of income for repayment of the loan. This cash flow would allow a person to obtain a loan in proportion to their income, by establishing the ability to repay the loan from their income.

SWORN BEFORE ME at the City of  
Toronto, in the Province of  
Ontario, this 10<sup>TH</sup> day of  
October, 2017.



A Commissioner for Taking Affidavits  
Within Ontario

Christina Shiwsankar  
a Commissioner, etc. for the  
Province of Ontario  
while being a licensed Paralegal

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)  
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PATRICIO SALAZAR CORDOVA

This is Exhibit "A" referred to in the  
affidavit of PATRICIO SALAZAR CORDOVA  
sworn before me at TORONTO, ON  
this 10<sup>TH</sup> day of OCTOBER 2017.

  
A Commissioner for taking Affidavits for Ontario

Christina Shiwsankar  
a Commissioner, etc. for the  
Province of Ontario  
while being a licensed Paralegal

## CURRICULUM VITAE

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### DR. PATRICIO SALAZAR CÓRDOVA

#### PERSONAL INFORMATION

**Passport Number:** 1707814354  
**Nationality:** Ecuadorian  
**Civil Status:** Married  
**Date of Birth:** 26 October 1975  
**Address:** Chimborazo S3-43 y Velasco Ibarra, Conjunto Pietralba, Casa 5, Cumbayá  
**Phone number:** 00 593 22041124, Cell. 0999468923  
**E-mail address:** patriciosalazarcordova@gmail.com

#### EDUCATION

Degree: *MBA Public Service*, December 7<sup>th</sup> 2005, International Development Department, The University of Birmingham, UK.  
Birmingham, September 2004 – December 2005.  
Subject of dissertation: The Electric Sector in Ecuador.

Degree: *Doctor in Jurisprudence*, February 21st 2001, Faculty of Social and Juridical Science, SEK International University.  
Quito, October 1993 - July 2000.  
Subject of the doctoral thesis: International Commercial Arbitration.

Degree: *Lawyer*, July 28th 1999, Faculty of Social and Juridical Science, SEK International University.  
Quito, October 1993 – July 1999.

Degree: *Bachelor of Juridical Science*, Faculty of Social and Juridical Science, SEK International University.  
Quito, October 1993 – July 1998.

#### COURSES

The University of Birmingham, *Business Management English*  
Birmingham, UK, August 2004 – September 2004

SEK England, *Cultural Studies*.  
London, UK, January 2000.

Harvard Law School, *Program of Instruction for Lawyers*.  
Cambridge Mass. USA, June 1998.

## PROFESSIONAL BACKGROUND

### **Personal Law Office**

Legal Counsel, Administrative Law, Tax Law, Human Rights and Environmental Law, Real Estate, Commercial, Negotiation and Intellectual Property, Trust and other structures. November 2010, to present.

### **TROLIBIT**

*General Manager/Share holder*

Real Estate

Responsibilities: Outline, develop and administrate the company related to Real State Business in Ecuador through the acquisitions of properties, building of commercial stores and finally letting them.

July 2006 to present

### **MIDLAND ATALNTIC LLC**

*Managing Member*

Real Estate

Responsibilities: Outline, develop and administrate the company related to Real State Business in Florida USA, through the acquisitions of Single Family Homes, and finally letting them.

October 2010 to present

### **CHAMBER OF COMMERCE OF QUITO**

*Member of the Board of Directors*

Commerce and Industry

Responsibilities: as part of the board involved in the administration of the Chamber by assisting to board meeting twice a month.

April 2015 to present

### **CHAMBER OF INDUSTRY & COMMERCE**

#### **ECUADOR & GREAT BRITAIN**

*Member of the Boar of Directors*

Commerce and Industry

Responsibilities: as part of the board, contribute to establish and achieve the goals of the Chamber by periodically assisting to the board's meetings every month and events as Director. Represent the Chamber before the International Centre for Arbitration and Mediation

July 2008-June 2010, July 2010-June 2012, July 2012-June 2014

### **BRUZZONE & SALAZAR ABOGADOS**

*Associate Partner/General Manager*

Law Firm

Responsibilities: Director Trade Area. Alternative Dispute Resolution Methods. Administrative Law, Constitutional Law, Tax Law, Corporate Law, Civil Procedure and Intellectual Property.

As General Manager responsible for managing all issues related to IT, HR, Finance, Marketing, accounting, and sales.

May 2003 to October 2010.

### **DEXICORP**

*General Manager*

Real Estate

Responsibilities: Outline, develop and administrate the company related to Real State Business through the acquisitions of properties, building of commercial stores finally letting them with income over \$ 700.000.00 for the year 2005. Activities mainly in Ecuador and subsidiary on Argentina.

March 2003- June 2004; July 2005 December 2006.



**GRUPO KFC-ECUADOR/VENEZUELA***In-house Lawyer, Manager  
of the Legal Department*

Business Group, Services, Fast Food, Real State, Electricity generation and Industry in Ecuador and Venezuela.

Responsibilities: Legal issues, Negotiation (Mergers and acquisitions), Real Estate, Administration.

July 2005 December 2006.

**SAN FRANCISCO UNIVERSITY***Lecturer*

Introduction to the Law

Responsibilities: teach, evaluate and promote students

August 2005 – December 2005.

**GRUPO KFC-ECUADOR***In-house Lawyer, Manager  
of the Legal Department*

Business Group, Services, Fast Food, Real State and Industry.

Responsibilities: Manage the Legal Department, Trade Law, Corporate Law, Intellectual Property, Tax Law, Administrative Law, Labour Law, Negotiation.

New stores, manage and negotiate Real Estate projects.

June 2001 – July 2004.

**PROFILE CONSULTORES***Junior Lawyer*

Law Firm-Consultants

Responsibilities: External consultant for Deloitte &amp; Touché on the Project of Diagnosis and Proposal of the Financial System for the Superintendence of Bank of Ecuador.

Assistance to the development of the Intellectual Property Department of the Firm.

February – June 2001

**PONCE, FERNÁNDEZ DE CORDOBA & SIMON** *Associate Partner*

Law Firm

Responsibilities: Trade Law, Corporate Law, Intellectual Property, Tax Law, Administrative Law, Labour Law, Negotiation, Civil Law, Constitutional Law, Civil Procedure Law.

April 1999 – February 2001.

**SEK INTERNATIONAL UNIVERSITY***Lecturer*

Administrative Law

Responsibilities: teach, evaluate and promote students

January 2001 – July 2001.

**SEK INTERNATIONAL UNIVERSITY***Assistant Professor*

Civil Law, Assets

Responsibilities: teach and evaluate students

October 2000 – July 2001

**UNIVERSIDAD CATOLICA DE QUITO, (PUCE)** *Assistant Professor*

Inheritance Successor Law

Responsibilities: teach and evaluate students

October 1999.

**QUEVEDO & PONCE***Legal Assistant*

Law Firm

Responsibilities: Civil Law, Civil Procedure Law, Administrative Law, Constitutional Law, Corporate Law, Trade Law, Human Rights (Interamerican Court of Human Rights, Case Suárez Rosero), Labour Law, Criminal Law, Transit Law.  
May, 1995 – April 1999.

**FUNDACIÓN ANTONIO QUEVEDO**

*Assistant to the Director*

Arbitration and Mediation Centre.

Responsibilities: Statutes, Regulations, Ethic Code, list of arbitrators and mediators and approval of the foundation of the Centre.

October 1997 – March, 1999.

**SEK INTERNATIONAL UNIVERSITY**

*Internship*

Free Assistance Centre.

Responsibilities: Civil Law, Civil Procedure Law, Labour Law, Criminal Law and Transit Law.

October 1997 – January 1998.

**SEK INTERNATIONAL UNIVERSITY**

*President of the Student Union*

Responsibilities: Represent the student community and liaison with authorities on Congress, Round Table Seminars and debates in Quito and other cities of the Country


November 1998 – October 1999.

**Languages:**

Spanish: mother tongue.

English: spoken and written.

This is Exhibit ".....B....." referred to in the  
affidavit of Patricio Salazar Cordova  
sworn before me at TORONTO, ON  
this 10<sup>TH</sup> day of OCTOBER.....2017

  
.....  
A Commissioner for taking Affidavits for Ontario

Christine Shivanikar  
a Commissioner, etc. for the  
Province of Ontario  
while being a licensed Paralegal



**CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS**  
 Desde: 2016

**Búsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales**

Ruc, Cédula, Pasaporte		Apellidos y Nombres		Tipo de Contribuyente	
0200266003		AZANTA MILAN SEGUNDO ANGEL		PERSONA NATURAL	

Consultas de Impuesto a la Renta y Salida de Divisas

Formulario	Impuesto a la Renta Causado		Impuesto a la Salida de Divisas	
	Año Fiscal	Valor Impuesto a la Renta Causado	Año Fiscal	Valor Impuesto a la Salida de Divisas*
107	2016	\$ 5.71	2016	\$ 0.00
107	2015	\$ 24.50	2015	\$ 0.00
107	2014	\$ 0.00	2014	\$ 0.00
102	2013	\$ 26.36	2013	\$ 0.00
107	2012	\$ 0.00	2012	\$ 0.00
107	2011	\$ 0.00	2011	\$ 0.00
107	2010	\$ 0.00	2010	\$ 0.00
107	2009	\$ 0.00	2009	\$ 0.00
107	2008	\$ 0.00	2008	\$ 0.00
107	2007	\$ 0.00	2007	\$ 0.00
107	2006	\$ 0.00	2006	\$ 0.00
107	2004	\$ 0.00	2004	\$ 0.00
107	2001	\$ 0.00	2001	\$ 0.00
107	2000	\$ 0.00	2000	\$ 0.00

Registros

\*Formulario / Tipo de Declaración:  
 102 Declaración del Impuesto a la Renta Causado, Mensual  
 107 Formulario Impuesto a la Salida de Divisas



SRI

SERVICIO DE RENTAS INTERNAS

CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

Desconectado

Búsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales

Consultas de Impuesto a la Renta y Salida de Divisas

1520011492001	RUC, Cédula, Pasaporte	Apellidos y Nombres	Tipo de Contribuyente
		TANGUILA GREFA FRANCISCO VICTOR	PERSONA NATURAL

Impuesto a la Renta Causado		Impuesto a la Salida de Divisas	
Formulario	Año Fiscal	Año Fiscal	Valor impuesto a la Salida de Divisas*
107	2002	2002	\$ 0.00
			\$ 0.00

\* Información respaldada por terceros. Sujeto a verificación

Esta información se encuentra respaldada en la base de datos del SRI. La misma que ha sido consultada en base a los datos ingresados por el contribuyente, asociado a la fecha de inscripción. Cualquier inconsistencia deberá ser reportada en el correo más cercano al ingresado al sitio de contacto del contribuyente de acuerdo a los datos ingresados en el formulario.

Para el correcto funcionamiento de este Sitio Web se requiere Internet Explorer 7.0 o superior.



CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

Impuestos y Aduanas

Busqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales

Consultas de Impuesto a la Renta y Salida de Divisas

RUC, Cédula, Pasaporte	Apellidos y Nombres	Tipo de Contribuyente
1500166524	CHIMBO TANGUILA ROSA TERESA	PERSONA NATURAL

Impuesto a la Renta Causado		Impuesto a la Salida de Divisas	
Formulario	Año Fiscal	Año Fiscal	Valor Impositivo a la Salida de Divisas*

Valor Impositivo a la Renta Causado		Valor Impositivo a la Salida de Divisas*	
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Regresar


Formulario / Tipo de Declaración: 102 Declaración del Impuesto a la Renta Mensual

107 Referencia Ecuatoriana en Relación de Experiencia

\* Información reportada por terceros, sujeta a verificación

Esta información se encuentra registrada en la base de datos del SRI. La misma que no podrá ser utilizada por terceros para fines distintos a los autorizados. En caso de encontrar algún error, favor de comunicarse con el SRI a través de la oficina más cercana a su domicilio. Para más información, favor de visitar la página web: <http://www.sri.gub.ec>

Para el correcto funcionamiento de este SDO, Web se requiere: Internet Explorer 7.0 / Firefox 1.5 (o superiores)



**SERVICIO DE RENTAS INTERNAS**

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**CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS**

Impuestos

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**Búsqueda de Impuesto a la Renta y Salida de Divisas-Personas Naturales**

<b>Rol:</b> 1707027178	<b>Apellido y Nombre:</b> REASCOS REVELO MARIA CLELIA	<b>Tipo de Contribuyente:</b> PERSONA NATURAL
<b>Rol:</b> Cédula, Pasaporte		

**Impuesto a la Renta Causado**

<b>Formulario:</b>	<b>Año Fiscal:</b>	<b>Valor Impuesto a la Renta Causado</b>
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**Impuesto a la Salida de Divisas**

<b>Año Fiscal:</b>	<b>Valor Impuesto a la Salida de Divisas*</b>
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Regresar

Convención / Tipo de Declaración:  
100 Declaración de Impuesto a la Renta Extranjera Anual  
107 Retención Efectuadas en Relación de Dependencia

\* Información requerida por terceros sujetos a verificación

Esta información se encuentra registrada en la sede del fisco del SRI de monto que sea por periodo de las Formas de las retenciones pagadas por el contribuyente, emisoras y agente en relación  
Cualquier información debe ser recibida en la oficina más cercana al domicilio del contribuyente en Chile o en el exterior EL DIFÍCIL DE CONTACTO de manera especial para: [rita@serviciorentas.cl](mailto:rita@serviciorentas.cl)

Para el correcto funcionamiento de este S to Web se requiere: Internet Explorer 7.0 / Firefox 4.0 o superiores

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Sistemas MIT-2003 y Santiago, Edit. Alhambra | 1700 SRI SRI (774.774) | Política de Privacidad | Copyright © 2010 SRI



CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

Datos de búsqueda

Búsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales

Consultas de Impuesto a la Renta y Salida de Divisas

050015304091	RUC, Cédula, Pasaporte	PATARDN GUARACA HELEDCRO	Apellidos y Nombres	PERSONA NATURAL	Tipo de Contribuyente
Formulario		Año Fiscal	Valor impuesto a la Renta Causado		Impuesto a la Salida de Divisas
			Valor impuesto a la Renta Causado		Valor impuesto a la Salida de Divisas*

Regional

Formulario: Tipo de Contribuyente  
 101: Declaración del Impuesto a la Renta Personas Naturales  
 107: Retención Efectuadas en Retención de Dependencia  
 \* Información referida por terceros, sujeta a verificación

Esta información es suministrada automáticamente en la base de datos del SRI, la misma que es de carácter reservado y no debe ser divulgada a terceros. Para mayor información consulte el sitio web del SRI: <http://www.sri.gov.ec>

Para el consulto fue utilizado el año SRI. Véase el requerimiento en el Explorador 7.0. (Fiscal 1.5 (o superiores))





SRI

SERVICIO DE RENTAS INTERNAS

CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

DISEÑO: J. GARCÍA

Búsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales

Consultas de Impuesto a la Renta y Salida de Divisas

1771818972	Buc, Cédula, Pasaporte	REVELO LORE JOSE GABRIEL	Apellidos y Nombres	PERSONA NATURAL	Tipo de Contribuyente
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Formulario		Impuesto a la Renta Causado		Impuesto a la Salida de Divisas	
	Año Fiscal	Valor Impuesto a la Renta Causado	Año Fiscal	Valor Impuesto a la Salida de Divisas*	
107	2009	\$ 0.00	2009	2009	\$ 0.00
107	2008	\$ 0.00	2008	2008	\$ 0.00

Regresar

Formulario / Tipo de Declaración  
102 Declaración del Impuesto a la Renta Personas Naturales  
107 Retención Eficiencia en Resolución de Dependencia

\*Información reportada con terceros, sujeta a verificación

Esta información se encuentra registrada en la base de datos del SRI. La misma que es accesible por medios electrónicos para el contribuyente, empresario o agente de mercado. Cualquier inconsistencia deberá ser reportada en la oficina más cercana (Apoyados SRI) o al Centro de la Ciudad de Bogotá (CENTRO CONTACTO del SRI) por correo electrónico: [atencion\\_cliente@sri.gov.co](mailto:atencion_cliente@sri.gov.co)

Para el correcto funcionamiento de este Sitio Web de consulta, Internet Explorer 7.0.1 (versión 4.0 o superiores)



## SERVICIO DE RENTAS INTERNAS

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### CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

Muestre resultados

**Búsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales**

RUC: Ciudad, Pasaporte: **IPIALES CHICAIZA JOSE MIGUEL**  
 Apellidos y Nombres: **PERSONA NATURAL**  
 Tipo de Contribuyente: **PERSONA NATURAL**

Consultas de Impuesto a la Renta y Salida de Divisas

Impuesto a la Renta Causado		Impuesto a la Salida de Divisas	
Fundamento	Año Fiscal	Año Fiscal	Valor Impuesto a la Salida de Divisas*
102	2010	2010	\$0.00
102	2009	2009	\$0.00
107	2008	2008	\$0.00
107	2007	2007	\$0.00
107	2006	2006	\$0.00
107	2005	2005	\$0.00
107	2004	2004	\$0.00
107	2003	2003	\$0.00
107	2002	2002	\$0.00
107	2001	2001	\$0.00
			\$54.20

\* Información reportada por terceros, sujeta a verificación.  
 Este informe de consulta ingresa en la base de datos del SRI la misma que ha sido consultada de los contribuyentes por el contribuyente emisor o agente de retención.  
 Cualquier inconsistencia deberá ser reportada en la oficina más cercana (Agencia SRI) o a través de la opción SERVICIO DE CONTACTO del menú principal de nuestra página Web: <http://www.sri.gov.ec>

Regresar



SRI

SERVICIO DE RENTAS INTERNAS

CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

Impuestos

Búsqueda de impuesto a la Renta y Salida de Divisas Personas Naturales

Consultas de Impuesto a la Renta y Salida de Divisas

RUC, Cédula, Pasaporte	Apellidos y Nombres	Tipo de Contribuyente
020046925001	CAMACHO NARANJO HUGO GERARDO	PERSONA NATURAL

Impuesto a la Renta Causado		Valor Impuesto a la Renta Causado
Formulario	Año Fiscal	\$113,26
102	2016	

Impuesto a la Salida de Divisas		Valor Impuesto a la Salida de Divisas*
Año Fiscal	2016	\$9,00

Regresar

Formulario / Tipo de Declaración  
 102 Declaración del Impuesto a la Renta Personas Naturales  
 107 Declaración Efectuada en Población de Dependencia

\* Información reportada por terceros según a verificar.

Esta información se encuentra reportada en el caso de datos de SRI, la misma que ha sido tomada de las declaraciones de datos reportados por el contribuyente, empleado o agente de retención. Cualquier inconsistencia deberá ser reportada en el momento de la declaración de impuestos a la Renta y Salida de Divisas en el portal de SRI o a través de la línea de atención al cliente 0187 447 4477.

Para el correcto funcionamiento de este Sitio Web se requiere Internet Explorer 7.0 / Firefox 4.5.0 o superior.



CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

Dispositivo:

Búsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales

Consultas de Impuesto a la Renta y Salida de Divisas

178937673	178937673	Rodríguez Barchenes María Magdalena	Rodríguez Barchenes María Magdalena	PERSONA NATURAL
178937673	178937673	Rodríguez Barchenes María Magdalena	Rodríguez Barchenes María Magdalena	PERSONA NATURAL

Impuesto a la Renta Causado		Impuesto a la Salida de Divisas	
Año Fiscal	Valor Impuesto a la Renta Causado	Año Fiscal	Valor Impuesto a la Salida de Divisas*

Regresar

Formulario 7 Tipo de Declaración 102 Declaración del Impuesto a la Renta Personas Naturales 107 Declaración Efectuada en Relación de Dependencia

\* Información requerida por terceros, según se verifique

Esta información es reservada y publicada en la página web del SRI a través de la opción BÚSCA DE CONSULTAS de manera periódica de acuerdo a lo establecido en el artículo 107 del Decreto Ley N° 2.964 de 1979, con sus modificaciones.

Para el correcto funcionamiento de este sitio web te sugerimos utilizar Internet Explorer 7.0 o superior.



CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

Impuesto a la Renta y Salida de Divisas

Búsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales

RUC, Cédula, Pasaporte 0400975546	Apellidos y Nombres VIVEROS CUSANGUA MARIA HORTENCIA	Tipo de Contribuyente PERSONA NATURAL
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Consultar de Impuesto a la Renta y Salida de Divisas

Impuesto a la Renta Causado		Impuesto a la Salida de Divisas	
Formulario	Año Fiscal	Auto Fiscal	Valor Impuesto a la Salida de Divisas*

1 2 3 4 5 6 7 8 9 10 11 12

Represal

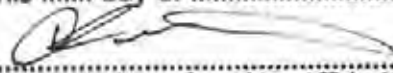
Formulario / Tipo de Declaración  
192 Declaración del Impuesto a la Renta Personas Naturales  
197 Retención Efectuada en Relación de Dependencia

\* Información autorizada por terceros, sujeta a verificación

Esta información se encuentra sujeta a las normas que rigen el impuesto a la renta y salida de divisas, en especial el artículo 192 del Código Tributario y el artículo 197 del Reglamento del Código Tributario. Para más detalles consulte el artículo 192 del Código Tributario y el artículo 197 del Reglamento del Código Tributario.

Para el concepto de Impuesto a la Renta y Salida de Divisas consulte el artículo 192 del Código Tributario y el artículo 197 del Reglamento del Código Tributario.

This is Exhibit "C" referred to in the  
affidavit of PATRICIO SALAZAR CORDONA  
sworn before me at TORONTO, ON  
this 10<sup>TH</sup> day of OCTOBER 2017.



.....  
A Commissioner for taking Affidavits for Ontario

Christina Shiwsankar  
a Commissioner, etc. for the  
Province of Ontario  
while being a licensed Paralegal



SRI

SERVICIO DE RENTAS INTERNAS

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

16/05/2014 14:24

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of  
Income Tax and  
Exit of Currencies

Form	RUC, Certificate, Passport	Surnames and names	Type of taxpayer
21004SR2001		LUSTANDE YANGJAE DANIEL CARLOS	NATURAL PERSON

Income taxes Caused		Value of the Income Tax Caused
Form	Fiscal year	
102	2014	\$ 108.85
107	2013	\$ 0.00
107	2012	\$ 0.00
107	2011	\$ 0.00

Exit Tax		Value Exit Tax*
Fiscal year		
2014		\$ 0.00
2013		\$ 0.00
2012		\$ 0.00
2011		\$ 0.00

To return

\*Form: Type of Declaration  
102 Declaration of the taxpayer's income tax  
107 Declaration made in favor of Dependence

\*Information received by third parties, subject to verification

This information is a response to the SRI's calculation, which has been taken from the forms and attachments filed by the taxpayer, employer or withholding agent. Any inconsistencies should be reported to the nearest office of the SRI's Agencies or through the CONTACT MAIL, located in the main menu of the website: <http://www.sri.gov.ec>







SERVICIO DE RENTAS INTERNAS

SRI

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Disconectado

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of  
Income Tax and  
Exit of Currencies

1500353121001 RUC, Certificate, Passport, Surnames and names, NATURAL PERSON, Type of taxpayer

PAYAGUAJE MIGUEL MARIO

Form		Fiscal year		Income taxes Caused		Value of the Income Tax Caused		Exit tax	
107		2013				\$ 0.00		2013	\$ 0.00
107		2012				\$ 0.00		2012	\$ 0.00
107		2009				\$ 0.00		2009	\$ 0.00
107		2002				\$ 0.00		2002	\$ 0.00
107		2001				\$ 0.00		2001	\$ 0.00

Form: 107, 107, 107, 107, 107

Totales

Form: Type of Calculator  
102 Declaration of the Personal Income Tax  
107 Withholding made in Retention of Dependence

Information reported by third parties, subject to verification.

This information is searched in the SRI database, when the search results from the Internet or by other means, and by the Ministry of Justice or other entities, for any requirements through the CONTRACT 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1040, 1041, 1042, 1043, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1104, 1105, 1106, 1107, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 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Natural person	Identity	<a href="#">Click on the icon: Padlock</a>	
RUC	RUC		
Identification card	Business name		
Passport	* Surnames and names		

PIAGUJE PAYAGUAGE TEODORO SC

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CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

10/25/2018 10:47

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

150025006291	RUC, Certificate, Passport	Surnames and names LUSITANDE YAIGUALJE SIMON	Type of taxpayer NATURAL PERSON
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Income Taxes Caused		Exit Tax	
Form	Fiscal year	Fiscal year	Value Exit Tax *

To return

Form: Type of Declaration  
10: Declaration of the Return of Income Tax  
10P: Information made in Relation of Dependence

\* Information reported by and parent, subject to verification

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CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Electronique

Consultation of  
Income Tax and  
Exit of Currencies

Natural person  
 RUC

Society  
 RUC

Identification card  
 Business name  
 Passport

Surnames and names

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CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Libre consultado

Search for Income Tax and Exit of Foreign Exchange Individuals

Doc, Certificate, Passport	Suriname and names	Type of taxpayer
2100045273	PAYAGUAJE JAVIER PAGES	NATURAL PERSON

Consultation of Income Tax and Exit of Currencies

Form	Income Taxes Caused		Exit Tax
	Fiscal year	Value of the Income Tax Caused	
102	2016		\$ 35.82
102	2015		\$ 0.00
102	2014		\$ 0.00
102	2013		\$ 0.00
102	2012		\$ 0.00
102	2011		\$ 0.00
102	2005		\$ 0.00

\* The Income Statement has not yet been submitted  
 \* The Income Statement has not yet been submitted

de 4 de 11

To return

Form, Type of Declaration, Calculation of the Personal Income Tax for Including made in Return of Dependence

\* Information reported by third parties subject to verification

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CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Disponible en

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

2100045224	Ric; Certificate; Passport	FINAGUAJE FERMIN FINAGUAJE	Summaries and names	NATURAL PERSON	Type of taxpayers
Form 107	Fiscal year 2009	Value of the Income Tax Caused	5 0 0 0	Fiscal year 2008	Value Exit Tax* 5 0 0 0

Form 107: Type of Distribution, Declaration of the Personal Income Tax, 107: Withholding made in Relation of Expenditures

\*Information reported by the parties related to verification

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CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

15/03/2014

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of  
Income Tax and  
Exit of Currencies

1500165716091	RUC, Certificate, Passport	PAYAGUAJE PIAGUAJE LUIS AGUSTIN	Surnames and names	NATURAL PERSON	Type of taxpayer
Form	Fiscal year	Income Taxes Caused	Value of the Income Tax Caused	Fiscal year	Exit Tax Value Exit Tax *

Yes No (E) (E)

To exit

Form: Type of Decision  
100: Calculation of the Foreign Income Tax  
101: Withholding made at Source of Expenses

\* Information provided by the taxpayer, subject to verification

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CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Unauthenticated

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

1500256021	RUC, Certificate, Passport	Surnames and names LUSITANDE YAGUAJE REINALDO	Type of taxpayer NATURAL PERSON
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Income Taxes Caused	
Form	Fiscal year
Value of the Income Tax Caused	
Exit Tax	
Fiscal year	Value Exit Tax *

To return

Form Type of Taxpayer  
1500256021  
1500256021

\* Information reported by third parties, subject to verification

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CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Desconectado

Consultation of  
Income Tax and  
Exit of Currencies

Click on the images Ballboots

- Natural person
  - RUC
  - Identification card
  - Passport
  - Surnames and names
- Society
  - RUC
  - Business name



AGUINDA SALAZAR MARIA VICTORIA

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No results found for this search

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CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Descargar

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of  
Income Tax and  
Exit of Currencies

150024069201	Ric, Certificate, Passport	GREFA HUATATZCA CARLOS	Surnames and Name	NATURAL PERSON	Type of taxpayer
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Income Taxes Caused		Exit Tax	
Folio	Fiscal year	Value of the Income Tax Caused	Fiscal year
107	2016	\$ 0.00	2016
107	2015	\$ 0.00	2015
107	2014	\$ 0.00	2014
107	2013	\$ 0.00	2013
107	2012	\$ 0.00	2012
107	2011	\$ 0.00	2011
107	2010	\$ 0.00	2010
107	2009	\$ 0.00	2009

Folio / Type of Declaration  
100 Declaration of the Personal Income Tax  
107 Withholding made in Favor of Dependence

\* Information reported by third parties, subject to verification

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To return



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

1590000581

Search for Income Tax and Exit of Foreign Exchange Individuals

1590000581	RUC, Certificate, Passport	Surnames and names	Type of taxpayer
		AQUINDA SALAZAR CATALINA ANTONIA	NATURAL PERSON

Income Taxes Caused	
Form	Value of the Income Tax Caused
Fiscal year	Exit Tax
	Value Exit Tax *

To return

Form / Type of Taxation  
000 Declaration of the Personal Income Tax  
107 Withholding made in Favor of Dependents

\* Information provided by third parties. Subject to verification

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CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Discompu S.A.

Search for Income Tax and Exit of Foreign Exchange Individuals

1600915089	Ruc, Certificate, Passport	Surnames and names	Type of taxpayer
		AGUINDA AGUINDA LIDIA ALEXANDRA	NATURAL PERSON

Consultation of Income Tax and Exit of Currencies

Income Taxes Caused		Exit Tax	
Folio	Fiscal year	Fiscal year	Value Exit Tax*
107	2016	2016	\$ 0.00
107	2015	2015	\$ 0.00
107	2014	2014	\$ 0.00
107	2013	2013	\$ 0.00
107	2012	2012	\$ 0.00
107	2011	2011	\$ 0.00
107	2010	2010	\$ 0.00

Value of the Income Tax Caused

\* Information reported by third parties, subject to verification.

This information is recorded in the SRI database which has been taken from the forms and/or attachments filed by the taxpayer, employer or withholding agent. Any inconsistencies should be resolved through the CONFIRMA SOLICITUD process in the near future. Our website: <http://www.sri.gob.pe>

To return:



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

16/03/2016

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of  
Income Tax and  
Exit of Currencies

1600370153001

Rac, Certificate, Passport: AGUINCA AGUINCA CLIDE RAMIRO

Surnames and names: AGUINCA AGUINCA CLIDE RAMIRO

Type of taxpayer: NATURAL PERSON

Form	Income Taxes Caused		Exit Tax	
	Fiscal year	Value of the Income Tax Caused	Fiscal year	Value Exit Tax*
107	2016	\$ 0.00	2016	\$ 0.00
107	2015	\$ 0.00	2015	\$ 0.00
107	2014	\$ 0.00	2014	\$ 0.00
107	2013	\$ 0.00	2013	\$ 0.00
107	2012	\$ 0.00	2012	\$ 0.00
107	2011	\$ 0.00	2011	\$ 0.00
107	2010	\$ 0.00	2010	\$ 0.00
107	2009	\$ 0.00	2009	\$ 0.00
107	2008	\$ 0.00	2008	\$ 0.00
107	2004	\$ 0.00	2004	\$ 0.00
107	2001	\$ 0.00	2001	\$ 0.00

To return

\*Form: Type of Certificate  
107: Individual Income Tax  
107: Withholding taxes in Relation of Dependence



SRI

SERVICIO DE RENTAS INTERNAS

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

08/06/2014

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of  
Income Tax and  
Exit of Currencies

1800203546	Rec. Certificate, Passport	CHIMBO YUMBO LUIS ARMANDO	Supernumerary and names	Type of taxpayer
				NATURAL PERSON

Income Taxes Caused		Exit Tax	
Form	Fiscal year	Fiscal year	Value Exit Tax*
197	2004	2004	\$ 0.00
			\$ 0.00

\* Information reported by third parties, subject to verification.  
 The information is recorded in the SRI database, which has been taken from the home area of statements filed by the taxpayer, employer or withholding agent.  
 Any inconsistencies should be reported to the nearest office of SRI (Aguafina) or through the CONTACT US link, shown in the main menu of our website: <http://www.sri.gov.ec>

To return





CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

MACROINFORMACION

Search for Income Tax and Exit of Foreign Exchange Individuals

1500518865	RUC: Certificación / Pasaport	Summaries and names	Type of taxpayer
		GREFA TRAGULUA BEATRIZ MERCEDES	NATURAL PERSON

Income Taxes Caused		Exit Tax
Form 107	Fiscal year 2014	Fiscal year 2014
		Value of Exit Tax *
		\$ 0.00

Consultation of Income Tax and Exit of Currencies

\* Informator provided to the parties, subject to verification.  
 This information is provided in the SRI database which has been taken from the forms and / or attachments filed by the taxpayer, employer or withholding agent.  
 The information should be verified in the related SRI systems, or through the CONTACT MAIL system in the main menu of our website: <http://www.sri.gov.ec>

For the proper functioning of this website requires Internet Explorer 7.0 (minimum 4.0 is required)



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

15/03/2016

Search for Income Tax and Exit of Foreign Exchange Individuals

Ruc, Certificate, Passport	Suppant's and names	Type of taxpayer
152066872001	GREFA TANGUILLA LUCIO ENRIQUE	NATURAL PERSON

Consultation of Income Tax and Exit of Currencies

Form	Income Taxes Caused		Exit Tax	
	Fiscal year	Value of the Income Tax Caused		Fiscal year
107	2016	\$ 0.00	2016	\$ 0.00
107	2015	\$ 0.00	2015	\$ 0.00
107	2014	\$ 0.00	2014	\$ 0.00
107	2013	\$ 0.00	2013	\$ 0.00
107	2012	\$ 0.00	2012	\$ 0.00
107	2011	\$ 0.00	2011	\$ 0.00
107	2010	\$ 0.00	2010	\$ 0.00
107	2009	\$ 0.00	2009	\$ 0.00
107	2008	\$ 0.00	2008	\$ 0.00
107	2007	\$ 0.00	2007	\$ 0.00
107	2006	\$ 0.00	2006	\$ 0.00
107	2005	\$ 0.00	2005	\$ 0.00
107	2004	\$ 0.00	2004	\$ 0.00
107	2003	\$ 0.00	2003	\$ 0.00
107	2002	\$ 0.00	2002	\$ 0.00
107	2001	\$ 0.00	2001	\$ 0.00
107	2000	\$ 0.00	2000	\$ 0.00

To return



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Publicaciones S.A.

Search for Income Tax and Exit of Foreign Exchange Individuals

Form	RUC, Certificate, Passport	Surnames and names	Type of taxpayer
150032876501		AGUINDA AGUINDA PATRICIO WUILSON	NATURAL PERSON

Consultation of  
Income Tax and  
Exit of Currencies

Form	Income Taxes Caused		Exit Tax	
	Fiscal year	Value of the Income Tax Caused	Fiscal year	Value Exit Tax
107	2010	\$ 0.00	2010	\$ 0.00
107	2011	\$ 0.00	2011	\$ 0.00
107	2012	\$ 0.00	2012	\$ 0.00
107	2013	\$ 0.00	2013	\$ 0.00
107	2014	\$ 0.00	2014	\$ 0.00
107	2015	\$ 0.00	2015	\$ 0.00
107	2016	\$ 0.00	2016	\$ 0.00
107	2017	\$ 0.00	2017	\$ 0.00
107	2018	\$ 0.00	2018	\$ 0.00
107	2019	\$ 0.00	2019	\$ 0.00

Form: Type of Declaration  
102 Declaration of the Personal Income Tax  
107 Withholding made in Relation of Currencies

To return



SERVICIO DE RENTAS INTERNAS



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

10/25/2018 10:51

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of  
Income Tax and  
Exit of Currencies

Ruc, Certificate, Passport

1900522187001

Surnames and names

CHIMBO YU-VEO PATRICIO ALBERTO

Type of taxpayer

NATURAL PERSON

Income Taxes Caused

Form	Fiscal year		Year of the Income Tax Caused	Value Exit Tax*
	2016	2017		
107	2016	2016	\$ 0.00	\$ 0.00
107	2016	2016	\$ 0.00	\$ 0.00
107	2014	2014	\$ 0.00	\$ 0.00
107	2013	2013	\$ 6.35	\$ 0.00
107	2012	2012	\$ 0.00	\$ 0.00
107	2011	2011	\$ 0.00	\$ 0.00
107	2010	2010	\$ 0.00	\$ 0.00
107	2009	2009	\$ 0.00	\$ 0.00
107	2008	2008	\$ 0.00	\$ 0.00
107	2007	2007	\$ 0.00	\$ 0.00
107	2002	2002	\$ 0.00	\$ 0.00
107	2001	2001	\$ 0.00	\$ 0.00
107	2000	2000	\$ 0.00	\$ 0.00

\*\* \* \*

to read



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Idioma: Español

Search for Income Tax and Exit of Foreign Exchange Individuals

150000026001	Ruc, Certificate, Passport	ALVARADO YUMBO FRANCISCO MATIAS	Surnames and names	NATURAL PERSON	Type of taxpayer
Form		Fiscal year	Income Taxes Caused		Exit Tax
			Value of the Income Tax Caused		Value Exit Tax *

To return

Form: Type of Declaration, ICC Declaration of the Personal Income Tax, 107 Information made in Relation of Absence

\* Information reported by user dated, subject to verification

This information is recorded in the SRI database, which has been taken from the forms and/or statements filed by the taxpayer, and/or by the taxpayer or authorizing agent. Any modifications should be reported to the nearest office of SRI Agencies, or through the CONTACT MAIL Service in the main menu of our website: <http://www.sri.gov.ec>



SRI

SERVICIO DE RENTAS INTERNAS

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

10/24/2018 10:00 AM

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

1000020251	RUC, Certificado, Pasaporte	GREFA CERDA OLGA GLORIA	Surnames and names	NATURAL PERSON	Type of taxpayer
Form	Fiscal year	Income Taxes Caused	Fiscal year	Exit Tax	Value Exit Tax*

To return

Form / Type of Document  
100 Consultation of the Personal Income Tax  
100 Information made in Relation of Dependence

\*Information reported by third parties, subject to verification.

This consultation is recorded in the SRI database, which has been taken from the source data, for the information provided by the taxpayer, employer or credit rating agent. Any information found to be incorrect in the master data (SRI database) or through the CONTRATO FISCAL will be reported through the SRI database. Información en español.



SERVICIO DE RENTAS INTERNAS

SRI

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

De: 06/05/2014

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

150030732001	RUC, Certificate, Passport	TANGUILA NARVAEZ NARCISA AIDA	Summaries and names	Type of taxpayer
				NATURAL PERSON

Income Taxes Caused	
Fiscal year	Value of the Income Tax Caused

Exit Tax	
Fiscal year	Value Exit Tax <sup>2</sup>

to return

Form Type of Declaration: Income Tax and Exit of Currencies Tax 407 (Information made in Relation of Dependence)

\* Submission required by third parties, subject to verification

This information is required in the SRI database when it is obtained from the forms and/or, as authorized, filed by the taxpayer, employer or withholding agent. Any inconsistencies should be reported to the nearest office of the SRI Agencies, or through the CONTACT US section on the main menu of our website: <http://www.sri.gub.ve>

For the proper functioning of the WebSite requires: Internet Explorer 7.0 - Firefox 4.0 (or higher)



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

14/08/2018 10:00:00 AM

Search for Income Tax and Exit of Foreign Exchange Individuals

1502059542001	Ruc, Certificate, Passport	YUMBO TANGUILA BERTHA ANTONIA	Surnames and names	NATURAL PERSON	Type of taxpayer
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Consultation of  
Income Tax and  
Exit of Currencies

Income Taxes Caused		Exit Tax	
Form	Fiscal year	Fiscal year	Value Exit Tax *

Form: Type of Declaration  
102 Declaration of the Personal Income Tax  
107 Withholding made at Retention of Declaration

\* Information reported by user selected, subject to verification.

This information is reported in the SRI, available, which has been taken from the forms and/or attachments filed by the taxpayer, employer or authorizing agent. Any irregularities should be reported to the administrative office (SRI Agrupación) through the TUN RUC MAIL, visible in the main menu of our website: <http://www.sri.gov.co>

To print





CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

1500142565

RUC, Certificate, Passport:

TANGUILA GREFA GLORIA LOCRECIA

Surnames and family:

NATURAL PERSON

Type of taxpayer:

Income Taxes Caused

Value of the Income Tax Caused

Exit tax

Fiscal year

Fiscal year

Value Exit Tax \*

\* Information required by third parties, subject to verification

This information is recorded in the SRI database, which has been taken from the forms and/or attachments filed by the taxpayer, employer or subcontractor. SRI is not responsible for the accuracy of the information. For more information, contact the SRI website: <http://www.sri.gob.ec>

To legal



SERVICIO DE RENTAS INTERNAS

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Electronical

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

04-00046590001	RUC, Certificate, Passport	VIVEROS CUSANGUA CELIA IRENE	Surnames and names	NATURAL PERSON	Type of taxpayer
<b>Income Taxes Caused</b>					
Form	Fiscal year	Value of the Income Tax Caused		Fiscal year	Exit Tax Value Exit Tax *

Form: Type of Declaration  
102 Declaration of the Person's Income Tax  
103 Withholding made in the Month of Residence  
\* Information received by third parties, subject to verification

This information is provided as the SRI database, which may have been taken from the forms and/or attachments filed by the taxpayer, employees or withholding agent. Any inconsistencies should be reported to the nearest office of the SRI, either in person or through the CONTACT MAIL option in the menu items of our website: <http://www.sri.gub.ve>

For the proper functioning of this website requires Internet Explorer 7.0 / Firefox 4.5 (at highest)

to file



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Descargar

Search for Income Tax and Exit of Foreign Exchange Individuals

166021106001 RUC, Certificate, Passport ALVARADO YUMBO LORENZO JOSE NATURAL PERSON

Consultation of Income Tax and Exit of Currencies

Income Taxes Caused		Exit Tax	
Form	Fiscal year	Value of the Income Tax Caused	Value Exit Tax *
107	2015	\$ 0.00	\$ 0.00
107	2014	\$ 0.00	\$ 0.00
107	2009	\$ 0.00	\$ 0.00
107	2007	\$ 0.00	\$ 0.00

\* Information reported by third parties, subject to verification.  
 Form / Type of Declaration:  
 107 Declaration of the Patrimonial Income Tax  
 107 Withholding made in Relation of Dependence

This information is recorded in the SRI database, which has been obtained from the form and / or statements filed by the taxpayer, employer or withholding agent. Any inconsistency should be reported to the nearest office of the SRI Agency, or through the CONTACT MAIL option in the main menu of our website: <http://www.sri.gub.ec>



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES  
 Consulta de impuestos y salida de divisas

Search for Income Tax and Exit of Foreign Exchange Individuals

1600224777	RUC: Certificatedly Passport	ALVARADO YUMBO FRANCISCO	Surnames and names	NATURAL PERSON	Type of taxpayer
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Consultation of Income Tax and Exit of Currencies

Income Taxes Caused	
Form	Value of the Income Tax Caused
Fiscal year	Fiscal year
	Value Exit Tax*

1 2 3 4 5 6 7 8 9 10

To return

\* Information reported by third parties, subject to retention.  
 This information is recorded in the OFI database which has been taken from the forms and attachments filed by the taxpayer, employer or withholding agent.  
 Any inconsistencies should be resolved in the interest of the SRI. For more information, please contact the SRI. \*Información reportada por terceros, sujeta a retención.  
 Esta información se registra en la base de datos OFI que se ha tomado de los formularios y anexos presentados por el contribuyente, empleador o retenedor.  
 Cualquier inconsistencia debe resolverse en el interés de la SRI. Para mayor información, comuníquese con la SRI.



SERVICIO DE RENTAS INTERNAS



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Discardability

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of  
Income Tax and  
Exit of Currencies

Form	RUC, Certificate, Passport	Surnames and names	Type of taxpayer
1800116165801		ALVARADO YULIBO FRANCISCO	NATURAL PERSON

Income Taxes Caused

Form	Fiscal year	Value of the Income Tax Caused
107	2008	\$ 0.00
107	2007	\$ 0.50

Fiscal year	Value Exit Tax*
2008	\$ 0.00
2007	\$ 0.50

To return

\* Information reported by the taxpayer, subject to verification.  
The individual is recorded in the SRI database under the identification code assigned by the taxpayer. Any individual not recorded in the SRI database should be reported to the relevant office of the SRI Agency for further information.

\* Information reported by the taxpayer, subject to verification.  
The individual is recorded in the SRI database under the identification code assigned by the taxpayer. Any individual not recorded in the SRI database should be reported to the relevant office of the SRI Agency for further information.



**CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES**

14-0000000000

**Search for Income Tax and Exit of Foreign Exchange Individuals**

Consultation of  
Income Tax and  
Exit of Currencies

1500000142	RUC, Certificate, Passport	TANGULA NARVAEZ LUISA DELIA	Surnames and Names	NATURAL PERSON	Type of taxpayer
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Income Taxes Caused	
Form	Fiscal year
Value of the Income Tax Caused	

Fiscal year	Exit Tax
Value Exit Tax *	

To enter

Form: Type of Declaration  
150 Declaration of the Person's Income Tax  
151 Information made in Relation of Dependence

\* Information recorded by third parties subject to verification

This information is recorded in the SRI database when the user has been identified as the taxpayer, employer or withholding agent. Any inconsistencies should be reported to the nearest office of SRI Adjuntos, or through the CONTACT MAIL, upon in the main menu of our website <http://www.sri.gub.ve>



SERVICIO DE RENTAS INTERNAS



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Disolución

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of  
Income Tax and  
EXIT of Currencies

15001413-0001	Rols, Certificate, Passport	Surnames and names	Type of taxpayer
		PYAHUALE PAVAHUALE ELIAS ROBERTO	NATURAL PERSON

Form	Income Taxes Caused		Exit Tax	
	Fiscal year	Value of the Income Tax Caused	Fiscal year	Value Exit Tax *
102	2015	\$ 6.11	2015	\$ 0.00
102	2014	\$ 127.47	2014	\$ 0.00
102	2013	\$ 11.51	2013	\$ 0.00
102	2012	\$ 0.00	2012	\$ 0.00
102	2011	\$ 0.00	2011	\$ 0.00
102	2004	\$ 238.86	2004	\$ 0.00
102	2003	\$ 119.22	2003	\$ 0.00

\* Information reported by third parties, subject to verification.  
This information is recorded in the SRI database, which has been taken from the Home and, for statements made by the taxpayer, employer or contracting agent.  
Any discrepancies should be reported to the request office - SRI Administrativa, or through the CONTACT MAIL, either in the main menu of our website: <http://sri.com.costarica.net>



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Search for Income Tax and Exit of Foreign Exchange Individuals

150224949	RUC, Certificate, Passport	CHIMBO PANGUILA LOURDES BEATRIZ	Sumames and names	NATURAL PERSON	Type of taxpayer
Form		Income Taxes Caused		Exit Tax	
Fiscal year		Value of the Income Tax Caused		Value Exit Tax *	

\* Information reported in the job database, which has been taken from the forms and documents filed by the taxpayer, employer or withholding agent. Any discrepancies should be resolved in the nearest office (SRI Regional) or through the CONTACT CENTER for the main menu: <http://www.sri.gub.ec>

Form / Type of Taxation  
 100 Declaration of Personal Income Tax  
 107 Accounting report in Ecuador of Residence  
 \* Information reported by third parties, subject to verification.

To return





SERVICIO DE RENTAS INTERNAS



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

1402787837001	RUC, Certificate, Passport	CORDOVA HUAYCA OCTAVIO ISMAEL	Summaries and Returns	Type of taxpayer
				NATURAL PERSON

Income Taxes Caused	
Form	Value of the Income Tax Caused
Fiscal year	

Exit Tax	
Fiscal year	Value Exit Tax *

Form, Type of Certificate, RUC, Certificate, Passport, 10% Retention made in Favor of Dependence

\* Information reported by third parties, subject to verifications

This information is recorded in the SRI database, which has been taken from the Returns and/or Attachments filed by the taxpayer, employer or withholding agent. Any inconsistency should be reported to the nearest office: SUN Aiguilones, through the CONTACT US button in the main menu of our website: <http://www.sri.gob.pe>

To return

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SERVICIO DE RENTAS INTERNAS

SRI

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Observaciones

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

183029552001	RUC, Certificate, Passport	PAYAGUAIE LUISIANDE GUILLERMO VICENTE	Surpnames and aliases	NATURAL PERSON	Type of taxpayer
Form 102	Fiscal year 2014	Year of the Income Tax Caused	\$ 118.94	Fiscal year 2014	Value Exit Tax \$ 0.00
<b>Income Taxes Caused</b>					<b>Exit Tax</b>

To return

Form/ Type of Declaration  
102 Declaration of the Personal Income Tax  
107 Withholding made in Payment of Dependence

\* Information received by third parties. Subject to verification.

This information is entered in the SRI database, which has been taken from the forms and / or statements filed by the taxpayer, employer or withholding agent. Any discrepancies should be referred to the relevant office: SRI Agencies or through the CONTACT MAIL option in the main menu of our website: <http://www.sri.gov.ec>



SERVICIO DE RENTAS INTERNAS



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

DISCOPECDET

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of  
Income Tax and  
Exit of Currencies

Identification	Rate, Certificate, Passport	Surnames and names	Type of taxpayer
1500280162001		PAYAGUAE ALFREDO DONALDO	NATURAL PERSON

Income Taxes Caused		
Form	Fiscal year	Value of the Income Tax Caused
107	2013	\$ 0.00
102	2009	\$ 0.00
102	2008	\$ 0.00

Exit Tax		
Fiscal year	Value Exit Tax *	To return
2013	\$ 0.00	
2009	\$ 0.00	
2008	\$ 0.00	

\* Information reported by third parties subject to verification.  
This information is recorded in the SRI database, which has been obtained from the forms and/or attachments filed by the taxpayer, employer or withholding agent.  
Any discrepancies should be resolved by the interested party (SRI Applicant) or through the CONTACT MAIL, under the main menu of the website <http://www.sri.gub.ve>



SERVICIO DE RENTAS INTERNAS



CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Documento 1

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

1500253005	Roc, Certificate, Passport	PAYAGUAJE PAVAGUAJE DELFIN LEONIDAS	Surnames and Names	NATURAL PERSON	Type of taxpayer
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Income Taxes Caused	
Form	Fiscal year
Value of the Income Tax Caused	
Fiscal year	Value Exit Tax *

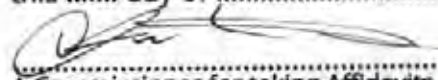
To return

Copy / Type of Document  
 107 - Consultation of Income Tax  
 107 - Information made in favor of Dependence  
 \* Information received by this system, subject to verification.

This information is included in the SRI database, which has been taken from the forms and/or attachments filed by the taxpayer, employer, employer or withholding agent.  
 Any considerations should be reported to the nearest SRI office, or through the CONTACTO MAIL, depending on the nature of the issue. [inform@wv.sri.gov.co](mailto:inform@wv.sri.gov.co)

For the proper functioning of this Website requires Internet Explorer 7.0 / Firefox 1.5 (or higher)

This is Exhibit "D" referred to in the  
affidavit of PATRICIO SALAZAR CORDONA  
sworn before me at TORONTO, ON  
this 16<sup>th</sup> day of OCTOBER 2017



A Commissioner for taking Affidavits for Ontario

Christina Shlyusker  
a Commissioner, etc. for the  
Province of Ontario  
While being a licensed Paralegal



**ecuador**  
ama la vida

Buscar



**SRI**  
...le hace bien al país

Inicio Información sobre Impuestos Impuesto a la Renta Tarifas

Inicio Información sobre Impuestos Impuesto a la Renta Tarifas

Personas naturales y sucesiones indivisas.- Para liquidar el Impuesto a la Renta en el caso de las personas naturales y de las sucesiones indivisas, se aplicará a la base imponible las siguientes tarifas:

Año 2017 - En dólares			
Fracción Básica	Exceso Hasta	Impuesto Fracción Básica	Impuesto Fracción Excedente
0	11.290	0	0%
11.290	14.390	0	5%
14.390	17.990	155	10%
17.990	21.600	515	12%
21.600	43.190	948	15%
43.190	64.770	4.187	20%
64.770	86.370	8.503	25%
86.370	115.140	13.903	30%
115.140	En adelante	22.534	35%

NAC-DGERGCG16-00000507 de 21/12/2016

Año 2016 - En dólares			
Fracción Básica	Exceso Hasta	Impuesto Fracción Básica	Impuesto Fracción Excedente
0	11.170	0	0%
11.170	14.240	0	5%
14.240	17.800	153	10%
17.800	21.370	509	12%
21.370	42.740	938	15%
42.740	64.090	4.143	20%
64.090	85.470	8.413	25%
85.470	113.940	13.758	30%
113.940	En adelante	22.299	35%

NAC-DGERGCG15-00003195 publicada en el S.R.O. 657 de 28/12/2015

Los beneficiarios de ingresos provenientes de herencias, legados, donaciones, hallazgos y todo tipo de acto o contrato por el cual se adquiera el dominio a título gratuito, de bienes y derechos, pagarán el Impuesto, aplicando a la base imponible las tarifas contenidas en la siguiente tabla:

Año 2017 - En dólares			
Fracción Básica	Exceso Hasta	Impuesto Fracción Básica	Impuesto Fracción Excedente
0	71.970	0	0%
71.970	143.930	0	5%
143.930	287.870	3.598	10%
287.870	431.830	17.992	15%
431.830	575.780	39.586	20%
575.780	719.710	68.376	25%
719.710	863.640	104.359	30%
863.640	En adelante	147.538	35%

Octubre 6 | EL SRI SUMA MÁS DENUNCIAS COMO PARTE DE LA LUCHA CONTRA LA DEFRAUDACIÓN TRIBUTARIA

Octubre 5 | AHORA LOS CONTRIBUYENTES PUEDEN SOLICITAR FACILIDADES DE PAGO POR INTERNET

- Guía práctica declaración de Impuesto a la Renta
- Campaña Impuesto a la Renta 2017
- Resumen principales cambios Reforma Tributaria
- Principales cambios tributarios producto del Código de Producción Comercio e Inversiones
- Ingresos de fuente ecuatoriana
- Exenciones
- Deducciones
- Tarifas
- Determinación del anticipo
- Retenciones en la fuente
- Preguntas Frecuentes
- Herencias Legados y Donaciones
- Crédito tributario y reclamos de devolución
- Informe de Cumplimiento Tributario (ICT)
- Certificados de declaraciones de retenciones por pagos hechos al exterior

Año 2016 - En dólares			
Fracción Básica	Exceso Hasta	Impuesto Fracción Básica	Impuesto Fracción Excedente
0	71.220	0	0%
71.220	142.430	0	5%
142.430	284.870	3.561	10%
284.870	427.320	17.805	15%
427.320	569.770	39.172	20%
569.770	712.200	67.662	25%
712.200	854.630	103.270	30%
854.630	En adelante	145.999	35%

NAC-DGERGCG15-00003195 publicada en el S.R.O. 657 de 28/12/2015

**Tablas de cálculo de Impuesto a la Renta 2017**

Incluye las tablas de cálculo de este impuesto tanto de períodos anteriores como del presente.



GOBIERNO NACIONAL DE LA REPÚBLICA DEL ECUADOR

**Presidencia**

El Presidente  
 La Presidencia  
 Palacio de Gobierno

**Vicepresidencia**

El Vicepresidente  
 La Vicepresidencia  
 Programas / Servicios

**Secretarías Nacionales**

Administración Pública  
 Comunicación  
 Gestión de la Política  
 Planificación y Desarrollo

**Secretarías**

Agua  
 Educación Superior, Ciencia,  
 Tecnología e Innovación  
 Desarrollo Amazónico  
 Gestión de Riesgos

**Ministerios Coordinadores**

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 Política Económica  
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**Ministerios**

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 Educación  
 Electricidad y Energía Renovable  
 Finanzas  
 Inclusión Económica y Social

Industrias y Productividad  
 Interior  
 Justicia, Derechos Humanos y  
 Cultos  
 Recursos Naturales no Renovables  
 Relaciones Exteriores y Movilidad  
 Humana  
 Relaciones Laborales  
 Salud Pública  
 Telecomunicaciones y de la  
 Sociedad de la Información  
 Transporte y Obras Públicas  
 Turismo



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 774 774  
 y desde Cuenca 04-2598-341

**DANIEL CARLOS LUISTANDE YAIGUAJE et al.**  
Appellants/Moving Party

-and-

**CHEVRON CORPORATION et al.**  
Respondents/Responding Party

Court File No.: M48342, C63309, C63310

**ONTARIO  
COURT OF APPEAL**

PROCEEDING COMMENCED AT TORONTO

**AFFIDAVIT OF PATRICIO SALAZAR CORDOVA**

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Llore, Maria Celia Reascos Revelo, Rosa Teresa Chimbo  
Tanguila, Maria Magdalena Rodriguez Bárcenas and María  
Hortencia Viveros Cusangua



**DANIEL CARLOS LUISTANDE YAIGUAJE et al.**  
Appellants/Moving Party

-and-

**CHEVRON CORPORATION et al.**  
Respondents/Responding Party

Court File No.: M48342, C63309, C63311

**ONTARIO  
COURT OF APPEAL**

PROCEEDING COMMENCED AT TORONTO

**MOTION RECORD OF THE MOVING PARTY**

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Tanguila, Maria Magdalena Rodriguez Bárcenas and Maria  
Hortencia Viveros Cusangua

# **EXHIBIT 40**

## **Funding Opportunity – Ecuador Litigation**

### **Summary**

The campaign to force Chevron to pay the \$12 billion Ecuador pollution judgment in Canada is entering a critical phase where a relatively modest amount of financial support can dramatically increase pressure on the company. We have worked tenaciously over the last several months in Canada to build a “dream team” of lawyers, indigenous leaders, and activists to press forward and positive results are clear. In recent weeks, we received our third consecutive appellate victory in Canada – a favorable dynamic similar to the one that existed when the underlying case was won in Ecuador in 2011.

Now, we need to take advantage of the recent successes to build even more momentum. The Ecuadorian communities are seeking bridge support of \$500,000 to increase pressure on Chevron. To be clear, our team operates with great efficiency – most of us work on a contingency fee basis. Chevron has outspent us on the order of 300:1 since the beginning of the case. That said, there are still significant expenses related to press outreach, organizing, travel, and legal fees that must be covered.

Support is needed in the following distinct areas:

- Building alliances in the AFN (confederation of 640 indigenous groups in Canada) for the collection of the full amount of the Ecuador judgment;
- Stepped-up legal work led by Canadian lawyers Peter Grant and Alan Lenczner to continue to garner powerful appellate court victories by re-framing the case as one that matters deeply to all Canadians and aboriginal groups;
- Ongoing advocacy work with environmental groups, media, and government officials to be led by former AFN National Chief Phil Fontaine and legendary Greenpeace Co-founder Rex Weyler;
- General activities to maintain existing pressure on the company, particularly via advocacy with Chevron shareholders;
- Support for a leading expert who will work with Steven Donziger to bring in a longer-term investment deal of between \$10 million and \$25 million.

### **Investment Structure**

Support can be structured either as a tax-deductible donation; as an 18-month bridge payable with a 10% interest rate payable upon the successful capital raise; or as an equity investment on same terms as our last round.

### **Alliance Between Indigenous Peoples of Canada and Ecuador**

Part of the funding will support the work of Canada's largest indigenous confederation on behalf of the Ecuadorian communities. Four major Ecuadorian indigenous community leaders have been invited to Ottawa as special guests of the national convention of the Assembly of First Nations (AFN) in Canada, scheduled to begin December 4. At the meeting, the leaders of both the national federations of Canada and Ecuador will a) announce a political alliance to hold Chevron accountable; b) explore a global boycott of Chevron over its refusal to pay the Ecuador judgment; c) lay the groundwork for a "Truth and Reconciliation" conference on the Ecuador pollution issue; and d) pass a resolution in support of collecting the judgment. One cannot overestimate the influence of the AFN in Canada, a country whose population is 10% indigenous and whose National Charter and judiciary support aboriginal rights to a much greater extent than in the United States.

Funding is needed for six people to travel from Ecuador to Ottawa for the AFN meeting; for a delegation of Canadian indigenous leaders from the AFN, including the current National Chief, to go to Ecuador; and to engage in advocacy and public education activities in Canada with aboriginal groups that are fighting various Chevron activities that are perceived as damaging to aboriginal rights, land title issues, and the environment.

### **Ongoing legal and advocacy work**

The funding also will be used to support the activities of the following individuals, all of whom are working at dramatically reduced costs but who bear travel and other expenses that must be covered:

**Peter Grant:** Peter Grant, the leading aboriginal rights lawyer in Canada, recently joined the legal team. Peter's impact is already being felt via a major court victory in Ontario Court of Appeal. Peter has argued almost every major indigenous rights case that has come to Canada's Supreme Court in the last three decades.

**Aaron Page:** Aaron is a U.S.-based lawyer who does critically important legal work in the U.S., Ecuador, and Canada. Aaron has been working on the matter for 12 years and is leading a number of important initiatives related to intensifying the pressure on Chevron in the legal and shareholder arenas.

**Rex Weyler:** Rex is an author and the co-founder of Greenpeace who has legendary reputation in Canada as an environmental activist and organizer.

**Patricio Salazar and Juan Aulestia:** Lawyer Patricio Salazar and longtime advocate Juan Aulestia manage issues related to law and government relations in Ecuador.

### **Case management and media**

Funds also will be used to cover media costs (including distribution of press releases); client relations, overall case management, fundraising, strategic planning and U.S.-based legal work (led by Steven Donziger); and to pay expenses involved in securing long-term funding from pools of capital to support the campaign for a period of years as necessary. Several large hedge funds have expressed interest in a major investment but the time horizon to close any such deal will be six to 12 months.

### **Capital raising**

We are committed to aligning strategically with capital partners who understand the urgency of settling the case, have best-in-class thinkers, and who appreciate the global repercussions on all indigenous groups given the magnitude of the judgment against Chevron. A portion of the funds will be used to pay expenses involved in securing long-term funding to support the campaign for a period of years if necessary. We have partnered with Katie Sullivan, who runs a family wealth business, to help lead the capital raise with Steven. Several large funds have expressed interest in a major investment. In building her business over the last 16 years, Katie has built deep relationships with networks of investment professionals.

### **Client relations and community organizing work in Ecuador**

Some funds also will be used to support the work of the Frente de Defensa de la Amazonia (FDA), the community-based organization in the affected area of Ecuador that is the legal entity that is collecting the judgment. The FDA represents the interests of all the indigenous peoples and farmer communities where Texaco operated. One of the group's founders, Luis Yanza, is a Goldman Prize winner.

### **November/December 2017**

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+1-917-566-2526

### **Disclaimer**

*Litigation finance transactions entail a high degree of risk, including the risk of loss of some or all invested capital. As potential judgments can be very high, defendants often will invest significant resources to defeat, reduce or merely defer potential payment obligations. Such measures can materially reduce the prospects of successful financial returns from financing high-profile, high-stakes litigation.*

*The information set forth in this overview provides only a brief summary of a complicated, multi-jurisdictional litigation with a long history. Efforts to enforce certain judgments have been time consuming, expensive, subject to reversal or appeal, and are likely to continue to be so. In addition, this litigation and related countersuits have resulted and in the future may result in conflicting determinations and judgments that may limit (a) the plaintiffs' ability to pursue claims, in particular jurisdictions, or at all; (b) the plaintiffs' ability to secure successful judgments or awards; as well as (c) the ability of certain parties to participate in any prospective recoveries.*

*Detailed information regarding the litigation described in this presentation, including without limitation information regarding the parties to the litigation, their respective agents and other interested parties, and the litigation and judgments involving such persons, will be made available to prospective investors prior to any investment by such persons. Prospective investors are strongly urged to carefully review any prospective litigation finance investment, and to discuss the risks associated with such investments with their legal and tax advisers.*

# **EXHIBIT 41**

### How New Capital Can Compress Time Frame

**Objective:** Raise risk pressure on Chevron to force settlement of Ecuador judgment at a meaningful price in the near future.

**Strategies** that need to be funded:

\*\*Identify Chevron pending projects in other countries and educate public and government officials there about risks of partnering with a company that does not respect court judgments. Cost to Chevron could be very high.

\*\*Mobilize indigenous groups and environmental NGOs around the world to join a call for a global boycott of Chevron until they pay the Ecuador judgment. Discourage governments from partnering with Chevron for not respecting local laws. Chevron could lose significant business.

\*\*Use public relations to paint company as a rogue actor around the world because of failure to comply with law in Ecuador and other places, like Australia.

\*\*Work with Chevron shareholders to pressure company management via shareholder resolutions and the like. Broaden approach from public pension funds to large private funds that have enormous leverage over management.

\*\*Launch enforcement action in another jurisdiction to seize Chevron assets. Make it feel like the risk is growing and is not contained to Canada (where it is high).

\*\*Launch other legal actions designed to pressure the company – including a defamation suit against company's star witness, who admitted lying in the RICO case; and, a shareholder derivative lawsuit against company management for misleading the markets about the risk from the judgment.

\*\*Step up media and publicity campaign to shine spotlight on company's human rights victims in Ecuador and the destruction of indigenous culture.

\*\*Truth and Reconciliation Conference with world leaders to be held in Calgary. Will put enormous pressure on Chevron to come to table if executed well.