

And it is with this character, with which on behalf of the Marketing Company, in

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ahead only mentioned sometimes as SAMANO , which I come to present Formal lawsuit, in the Ordinary Civil Way , for the claims and legal consequences manifested in this writing in the chapter corresponding, against the defendants that I need in the same way in the respective chapter, exercising the Promised Reward Payment Action and Compliance with Commercial Obligations Contracted by agreement unilateral manifestation of the will and by express provision of the Law Nigerian application in this matter for the reasons explained in the development of my demand.

To meet the requirements of numerals 1061, 1378 and 1380 of the Commercial Code hereinafter abbreviated as CC , in addition as ordered in article 322 of the Federal Code of Civil Procedures in hereinafter abbreviated only as CFPC , and even in the absence of both, what is available

number 267 of the local Code of Civil Procedures, hereinafter Abbreviated CPCJ , under protest to tell the truth, I manifest to you C. Judge: I. Court before whom it is promoted ; (1378 f. I CC, 322 f. I CFPC and 267 f. I CPCJ). I have already indicated it.

II.- Name of the actor, Widely authorized, authorized to notifications, and address to receive them ; (1378 f. II CC, 322 f. II CFPC and 267 f. II

CPCJ). I already pointed it out in the foreword of this demand brief.

The commercial company, called COMERCIALIZADORA Y SERVICIOS ADUANALES SAMANO SA DE CV , whose sole administrator is Mr. José Salazar Tinajero, through the undersigned. Lic. Joaquín Esparza Méndez, Lawyer

as I credit it with my electronic record and my copy of the professional license federal, which I will show in the first of the hearings, with which I certify that I require to act under the direction and sponsorship of another legal professional

Annex the simple copy of the constitutive deed, in addition to the Notarial Faith

of the notary who vows to have it in sight by granting it, the general power of attorney for lawsuits

and collections of the undersigned, copies of the RFC, of the Comercializadora, and the curp of the

subscribed since under protest to tell the truth I manifest that personally the subscribed I have no obligation to be registered in the Padrón del Sat.

III. The name of THE DEFENDANTS and the address in which each can be summoned ; (1378 f. III and 267 f. III CPCJ)

A) The commercial corporation, called: NIGERIAN NATIONAL PETROLEUM CORPORATION. Who is registered as a corporation of a mixed nature (Public-Private) in the WTO World Organization of Trade since January 1, 1995 and GATT member since 18 November 1960, organizations to which the state also belongs Mexican.

This corporation can be located at the official Address in the City from Mexico, through EXCMO. MR. ZHIRI JAMES GANA, Ambassador Extraordinary and Plenipotentiary of the Federal Republic of Nigeria at number

125 of Calle Diego Fernández de Cordova, in Col. Lomas Virreyes, Miguel Hidalgo CP 11000 Mexico City Delegation email

[info@embassyofnigeria.com.mx](mailto:info@embassyofnigeria.com.mx)

Or at your known address in the City of London, England, in the United Kingdom, UK Office, Duke Oil Services (UK) Ltd, Capitol House, 159

Hammersmith Road, London, W6 8BS, Phone +44 (0) 20 8735 9600, Fax +44

(0) 20 8748 1015, Telex 925509 Nigpt G, E-mail [Duke@nnpc-london.com](mailto:Duke@nnpc-london.com)

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Or, failing that, at its headquarters in the Federal Republic of Nigeria, "The Group General Manager", NNPC Towers, Herbert Macauley Way,

Business District, PMB 190, Garki, Abuja. Nigerian Fed Fed.

In which case I will request that through international cooperation summons by request that it be forwarded by the Federal Judicial Branch

B) The Ministry of Finance of the Federal Republic of Nigeria, with official name in English: MINISTRY OF FINANCES of the Republic Nigerian Federal. With legal domicile in this city of Mexico, equally way at the Nigerian Federation Consulate

Or at its headquarters in the Nigerian capital, Federal Ministry of Finance

(FMF), Ahmadu Bello Way, Central Business District, Abuja, Nigeria, PMB 14,

Abuja, Nigeria Abuja FCT 00234 Nigeria, <http://www.finance.gov.ng>

C) The Institute of Administration of the Federal Republic of Nigeria, With legal domicile in this city of Mexico, likewise in the Consulate

of the Nigerian Federation with official name in English: The

Nigerian Institute of Management (Chartered), [info@managementnigeria.org](mailto:info@managementnigeria.org)

Or at its headquarters in the Nigerian capital, 4, Kaltungo Street, Off Egbedi Close, Off Ladoke Akintola Boulevard, Garki 2 (Near Treasury House)

Garki, Abuja, FCT. Telephone: 08052597220

D) The Federal Government of the Federal Republic of Nigeria, through its Constitutional President. Muhamadu Buhari .

This Government can be summoned to trial at the official address in the Mexico City, through EXCMO. MR. ZHIRI JAMES GANA, Ambassador

Extraordinary and Plenipotentiary of the Federal Republic of Nigeria at number

125 of Calle Diego Fernández de Cordova, in Col. Lomas Virreyes,

Miguel Hidalgo CP 11000 Mexico City Delegation email

[info@embassyofnigeria.com.mx](mailto:info@embassyofnigeria.com.mx)

E) The Mr. Mele Kyari ; As a joint obligor, in his capacity as Director General (Management Director) of (COMD) Crude Oil Marketing

Division, of the Board of Directors (The Group General Manager) of the NNCP, (Nigerian National Petroleum Corporation)

With the same address as the first of the defendants pointing it out

for the same effects as inserted to letter, and / or the Fifth Floor, Block B, of the

NNPC Towers, on Herbert Macauley Avenue, in the Business Sector,

Business District, Garki, Abuja. In the Federal Republic of Nigeria. Phone:

+234 9 460 82501

To the previous ones I jointly do the following

IV. CLAIMS:

With its accessories; (1378 f. IV, 322 f. V CFPC and 267 f. IV CPCJ)

A) For the Payment of the Reward Offered by the Government of the Federal Republic of Nigeria, by law [SB. 233] WHISTLE

BLOWER PROTECTION BILL, 2008 , issued by NIM: Nigerian

Institute of Management and in charge of the Ministry of Finance, of the Federal Republic of Nigeria, with official name in English:

MINISTRY OF FINANCES of the Federal Republic of Nigeria,

NNPC, meaning the International Mercantile Corporation, Nigerian National

Petroleum Corporation, and in solidarity by Mr. Mele Kyari who, in his capacity as legal representative of the NNCP, received from  
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from my Principal: SAMANO SA DE CV directly from Sole Administrator of the same. The information that I bring to all mentioned above "Recover" the Amount of 48 million barrels of oil; Everyone's Claim, Consistent Promised Payment at 05% of the total market value of Oil recovered at the value Exactly that he had the day of his insurance by the Nigerian Government.

B) For the Payment of the Moratorium interest generated from the day of default on the part of the defendants, that is, from the 30 days after the summons in the judgment of each of them, Act that constitutes the effects of judicial requirement and up to the total liquidation of the previous benefit

C) For the payment of ALL expenses and costs of representation trips and efforts made, and continue to perform my represented, by the maintenance of the Offices in Nigeria, so that the information was within the reach of the Nigerian Government, to achieve assurance thereof, and collection of the promised Reward and ordered by Nigerian law, this until the end of trade conflict and the full settlement of what is claimed in the preceding paragraphs.

D) For the payment of ALL the expenses and costs of the present judgment that the breach of the defendant's obligation to pay has generated, from the day of expiration until the total settlement of the I owe that the defendants are sentenced.

V. FACTS ;

On which I base my petitions: (1378 f. V, 322 f. III CFPC and 267 f. V CPCJ)

1.- In the Certification inserted in the General Power of Attorney for Acts of Administration and Judicial Power for Lawsuits and Collections that I attach to this

demand, issued by the faith of Lawyer Verónica Aidé García Ayala, attached e functions to the Public Notary number 301 (Three hundred and one) of which he is the holder

Hector Luis Madrigal Martínez practicing in the city of Reynosa Tamaulipas, this notary had before her the first testimony of Act number

5210 (Five thousand two hundred and ten) thrown in the City of Reynosa in the State of

Tamaulipas of the United Mexican States, certification of which it shows how they pray the copies of it attached to the lawsuit, which on the thirteenth day of the month of December of the year 2011 two thousand eleven, before the

Carlos Sánchez Torres, Notary Public number 219 two hundred nineteen, from the fifth judicial district of that same State, legally a society that I represent, that is to say the MARKETER AND SERVICIOS ADUANALES SAMANO SA DE CV

In its third article it was established that his address is located in the Reynosa city, Tamaulipas, Mexico. Without prejudice to being able to establish

Agencies, Branches or Representations anywhere else in the Republic Mexican or abroad, and submit to conventional addresses.

Its corporate purpose is defined in its Fourth Article, among the main ones:

1.- Purchase, sale, import, export, consignment and commercialization of all kinds of supplies, equipment, machinery, tools, materials, articles, merchandise, and goods in general to final consumers, the

industry, commerce, service providers and public entities. ....

2.- Provide consulting and advisory services in trade matters Exterior

14.- In general terms, carry out and celebrate all kinds of acts legal and civil, commercial, administrative and any other contracts nature, related to its social objects.

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25.- Provision of professional services consisting of a) Planning draft and design of industrial and oil engineering.- b) .-...

26.- the commercialization of all kinds of materials, equipment, spare parts, tools for the oil industry and public and private sector companies in general.

27.- the purchase, sale, rent, import and export of all kinds of materials, equipment, spare parts, and tools for the oil industry, public and private companies in general.

28.- The provision of services to the oil industry, as well as to public and private companies and customers in general.

56.- Executing any legal act of commerce, or related industry with machinery, goods or commercial effects.

In Article six.- it is established that the company is a NATIONALITY MEXICAN.

This company is duly registered in the Folio Document electronic business number 2464 \* 2, from District II, Reynosa Tamaulipas, Registry and Cadastral Institute in the State of Tamaulipas.

On June 9, 2012, an assembly was held extraordinary where two of the partners sold some of their shares such as is recorded in the Notary Act of Public Deed number 1561 thousand five hundred sixty-one, passed before the faith of the Lawyer Verónica Aidé García

Ayala, attached and functions to the Public Notary number 301 (Three hundred and one) of

which is the holder of the Degree Héctor Luis Madrigal Martínez in exercise in the

Reynosa Tamaulipas city, with or that there was a redistribution of capital, in

the terms indicated in the attached simple copies, for legal purposes there is room

3.- In a short time, my client had an exponential increase of commercial activities, thanks to the effort of its Sole Administrator and partner

majority Mr. José Salazar Tinajero , who with his accurate administration, and

the right commercial movements quickly managed to avant-garde and be a spearhead in imports in the city of Reynosa Tamaulipas.

As a consequence of the geographical location, and other factors social, economic and even political, of the states bordering the border of our country, SAMANO TRADER AND CUSTOMS SERVICES SA DE CV, whom I refer to in the rest of this lawsuit as SAMANO , was breaking through the International community of commercial companies that

They are dedicated to the oil industry.

Among its main activities are consulting, construction of projects and structures for it, and the tender for the participation in the sale of hydrocarbons to the commission.

SAMANO, is a promoter of sales, oil, through the uses and customs of the company, and the trade industry World Oil Company, especially for liberal economies that allow a direct participation of legally established people in their places of

origin such as parastatal companies, oil managers in Venezuela, Panama, Dominican Republic, China and of course the Federal Republic of Nigeria (Federal Republic of Nigeria)

4.- Because we have offices in the state of Texas, United States United States of America and the good relations that SAMANO has with the Governments

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of Texas and the Federal Government of the United States of America, based on

trust and honesty with which, over the years my principal on North American soil in its commercial relations, is constantly required for advice and counseling from the largest Oil brokerage companies selling all types of crude oil.

One of our partners hired by SAMANO Mr. MARCO ANTONIO RAMIREZ, is our representative in the Republic of Nigeria, and He is currently residing in that country since FEBRUARY 2016.

5.- For all these reasons, being the sole Administrator SAMANO, on a promotional tour of various Central American countries, to projects for low-cost housing in the Dominican Republic we met a company that is dedicated to the commercialization of oil and its derivatives that

I request the advice of SAMANO, so that in the cordial relationships that we have with the Government of the Federal Republic of Nigeria, we could find out about the requirements to participate in the promotion and sale to Nigerian Oil commission that was stored in the Republic

Popular china

SAMANO is not only interested in serving as manager of these companies, which for commercial use and custom and for confidentiality professional that a Selling Promoter must keep regarding his clients, for ethical reasons, and especially of markets, keeping in reserve our client portfolio, so we decided to omit this data or specify which of the companies that appear in the documentation described throughout of this demand, they were the ones who sent us directly the communications that

now we exhibit and they were sent to us to do the research necessary to obtain for our advisers, the information to participate in the sale of that crude oil that was in the Tanks of China, and not only that, but in this vocation my own represented, was in agreements commercial with two other companies that prefer not to be mentioned, to

form a fund that would allow the purchase of all the oil stored in China to the Federal Republic of Nigeria.

It is common for companies that are dedicated to oil brokerage, are constantly in contact with the transport companies of the same in tanker ships, so SAMANO have like any another Crude trader, constant communication with these companies, 5.- It is in this way that without being able to specify the exact date of the shipments,

management requests, commercial inquiries that our clients, but that was carried out during the month of May 2015, my represented gathered and compiled the oil information that apparently the Nigeria's own government was promoting for sale.

First, SAMANO had knowledge that they were in the QINGDAO Port, Republic of China stored in a company of Income from oil containers called SS MARKAB STAR, deposited or stored in 5 container tanks, the amount of SIX MILLION Barrels of Crude, called Nigerian Ligth Crude (Export Grade), which It had been downloaded since May 16, 2015, what I call Powerfully the attention of the SAMANO Company. At that time that oil had been deposited there for more than three months, when the Nigerian crude oil sales are even held, with Oil still at on board tankers, without even needing to pour it into containers, in the case of this particular oil it was a movement too unusual.

Within the summary of the UNITED NATIONS CONFERENCE ON TRADE AND DEVELOPMENT TRADE AGREEMENTS, OIL AND ENERGY POLICIES, Published electronically in: [http://unctad.org/es/Docs/poitcdtsbd9\\_execsum.sp.pdf](http://unctad.org/es/Docs/poitcdtsbd9_execsum.sp.pdf),

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It is established: "... The strategic importance of oil trade in the The world economy has been such that in the past it has been treated as a case

especially, in a largely political context and outside multilateral rules of trade of the GATT. It looks like there has been a "gentleman's agreement" for such purposes. In any case, until 1980 almost all developing countries oil exporters were not contracting parties to the GATT (with the exception from Gabon, Indonesia, Kuwait and Nigeria). The general attitude of the countries

oil exporters seemed to indicate that these countries would have little to



gain and much to lose as members of the GATT given that, on the one hand, exported a product for which market access is not difficult, while on the other, being contracting parties to the GATT, they had to commit to comply with multilateral trade rules in relation to oil sector policies and the import regime in general

Therefore, there are strict protocols not only for handling but for sale of crude oil in the international free market, in the mixed market in which private is allowed to participate in the trade of this satisfier and is not, as in other economies exclusive monopoly of the State itself

For these reasons SAMANO, the company I represent, took on the task of going personally to the Chinese facilities, interviewing the Interested companies, as well as the transport companies, which sought to obtain

from the Nigerian Government an ATS, (Authorization to Sell) Authorization to Sell, and

obvious, with the Nigerian Government itself through our representative in that country Mr. Marco A. Ramírez

6.- During the month of May 2015, the company I represent, through the offers received and databases that are consulted, and the direct communication with the companies that had sent the information to SAMANO to investigate whether this oil stored in Chinese ports could realize as it appears from the attached series of documentation the present demand, that:

- Altogether they added at least 48 million barrels of crude that were unusually stored in various port tanks from China
- That of all of them its origin was NIGERIA.
- They had reached the ports and storage tanks in QINGDAO, Zhoushan and Rhizao, in China.
- In the industrial parks already mentioned in the previous paragraph.
- That they had the name of each of the companies they rented and tanks for oil transfer.
- The route he had followed
- Landing orders
- The certifications of having the crude oil protected, of different tank-owning companies
- From the identification of each one of these containers
- That each of those 48 million barrels, had the respective Authorization to sell ATS.
- But even so, for some inexplicable reason, no one had acquired

none of those lots of 2, 4 and up to 6, million barrels of oil  
All of this can be seen both in printed documents and in the  
series of source documents in PDF file, which are added to the demand, and  
which  
were described in the previous points  
They were quite contradictory, not usual, it was against all use  
custom and business logic more in the case of crude oil in high demand  
international.

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7.- As is a widely known fact, on May 29, 2016,  
the new President agrees to the presidency of the Federal Republic of Nigeria  
of the Republic, Lord Muhamadu Buhari, and announces among other things  
a  
zero tolerance policy and frontal attack on corruption.  
Our representative in Nigeria, Marco A. Ramírez, took on the task of  
investigate in the new cabinet of the Federal Government of that country,  
regarding the  
procedure to be followed for ATS renewals (Authorizations  
for sale of oil) granted by the former regime of the former President  
Goodluck Jonathan, whether it be to participate in the promotion or direct  
sale,  
reselling, or even if there is no other way, by acquiring some part to  
commercialize it, that's how SAMANO contacted Mr. Ahmed Hamma  
Saleh, friend of Marco A Ramírez to find the contact within the  
Nigerian Government to investigate the provenance of stored oil  
in China and get an authorization to participate in the sale of crude oil  
stored in china.  
In the words of Mr Ahmed we were informed that the Nigerian Government  
did not  
was aware of that oil and therefore the provenance was not  
<span style="fon