**ANNEX 1: FIRST CURACAO INTERNATIONAL BANK N.V. - SETTLEMENT PROCEDURE FOR CERTAIN CLIENTS, INCLUDING CLIENT CATEGORIES MENTIONED IN THE COURT RULING OF FEBRUARY 16, 2007**

The following categories of clients are mentioned in the court ruling in Curacao of February 16, 2007:

- Telecom and computer trading industry;
- Trust;
- Money Service Bureaus (MSBs);
- Politically Exposed Persons (PEPs); and
- Gaming

This settlement procedure will also apply for the following category of clients:

- All other clients who performed transactions for third parties such as Financial Service Providers (FSPs);
- In some cases conventional clients;
- All clients of whom requests for information were received from appropriate authorities;
- All account holders appearing in the criminal investigation file(s).

FCIB will perform the following settlement procedure:

1) Inform clients via this website of FCIB regarding the procedure for closing accounts and making payments of account balances and the contents of the Auditor's Report to be provided.
2) Classify the individual clients into the certain categories, including client categories mentioned in the court ruling in Curacao of February 16, 2007.
3) A help desk (compliance@firstcuracao.com) will be made available for the benefit of clients and auditors.
4) Transactions of the clients will be analyzed to identify possible unusual transactions.
5) Receive the completed Auditor's Report along with any other that may be specifically required information to satisfy FCIB's KYC/EDD requirements.
6) Send reminders to clients who have not fulfilled the documentation requirements including the Auditor's Report.
7) Request at random investigation files from auditors for review.
8) Perform on-site verifications at random.
9) Analyze the Auditors' Reports. Attention will be paid especially to deviations from the standard Auditor's Report and any possible supplementary remarks. The Auditor may be contacted in order to obtain an explanation before a definite qualification is given.
10) The Auditor's Report will be matched with the outcome of the internal KYC/EDD investigation.

11) The results of the above exercise would be documented separately.
12) Legal review of client files will be performed by attorney(s) at law as deemed necessary.
13) The results will be communicated to the Central Bank of Netherlands Antilles (BNA) for approval.
14) After BNA's approval is received, it is intended that 75% of the account balance(s) will be paid within 15 working days.
15) Communicate information on the settlement of the remaining balances at a later date.