

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

BSG RESOURCES LIMITED (in
administration),

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 19-11845 (SHL)

**DECLARATION OF LISA M. SCHWEITZER IN SUPPORT
OF VALE S.A.'S OPPOSITION TO THE MOTION OF THE
JOINT ADMINISTRATORS FOR A PROTECTIVE ORDER**

I, Lisa M. Schweitzer, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney duly admitted to practice before this Court, and I am a partner of the law firm Cleary Gottlieb Steen & Hamilton LLP ("Cleary Gottlieb"), counsel for Vale S.A. ("Vale"). I respectfully submit this declaration ("Schweitzer Declaration") in connection with *Vale S.A.'s Opposition to the Motion of the Joint Administrators for a Protective Order* ("Opposition").¹

2. Attached hereto as Exhibit A is a true and correct copy of "The Liechtenstein Foundation," an informational pamphlet published by Marxer & Partner, a law firm headquartered in Liechtenstein.

3. Attached hereto as Exhibit B is a true and correct copy of an article by Monica Mark, *The Panama Papers May Help Unravel the Corruption 'Deal of the Century,'* published by BuzzFeed News, dated April 7, 2016.

¹ Unless otherwise indicated, capitalized terms not defined herein have the meaning ascribed to them in Vale's *Initial Objection to the Joint Administrators' Verified Petition for Recognition of Foreign Proceedings Under Chapter 15 of the United States Bankruptcy Code*, ECF No. 29.

4. Attached hereto as Exhibit C is a true and correct copy of an article, *New evidence ties BSGR to company behind Guinea mine bribery*, published on the Global Witness website, dated August 15, 2013.

5. Attached hereto as Exhibit D is a true and correct copy of a press release, *Settlement of the Dispute between the Republic of Guinea and BSG Resources*, published by BusinessWire, dated February 25, 2019 (“BSGR Press Release”).

6. Attached hereto as Exhibit E is a true and correct copy of an article, *Mick Davis and the team ready to take on Beny Steinmetz’s former iron ore assets*, published in Issue 434 of Africa Intelligence, dated March 5, 2019.

7. Attached hereto as Exhibit F is a true and correct copy of an article by Neil Hume and David Sheppard, *Mick Davis Comeback Orchestrated by Beny Steinmetz’s Group*, published on the Financial Times website, dated April 15, 2019.

8. Attached hereto as Exhibit G is a true and correct copy of the Director’s Register of Litigation Solutions Limited, published by the Government of Bermuda’s online Registrar of Companies and last accessed on July 19, 2019.

9. Attached hereto as Exhibit H is a true and correct copy of the Director’s Register of Star West Investments Limited, published by the Government of Bermuda’s online Registrar of Companies and last accessed on July 19, 2019.

10. Attached hereto as Exhibit I is a true and correct copy of the Director’s Register of Americano Nickel Limited, published by the Government of Bermuda’s online Registrar of Companies and last accessed on July 17, 2019.

11. Attached hereto as Exhibit J is a true and correct copy of the Director's Register of Americano Nickel Finance Limited, published by the Government of Bermuda's online Registrar of Companies and last accessed on July 17, 2019.

12. Attached hereto as Exhibit K is a true and correct copy of the judgment and order in *BSG Resources Ltd. v. Vale SA and Ors* [2017] EWHC 760 (Comm) (Eng.).

13. Attached hereto as Exhibit L is a true and correct copy of an article by Thomas Biesheuvel, *Beny Steinmetz Puts Mining Company BSGR Into Administration*, published on the Bloomberg website, dated March 7, 2018.

14. Attached hereto as Exhibit M is a true and correct copy of an article, *Secret Dealings Tying UK Conservatives' CEO to Bribery Scandal Billionaire*, published on the Global Witness website, dated May 3, 2019.

15. Attached hereto as Exhibit N is a true and correct copy of an article by Barbara Lewis, *Administrators seek to return Steinmetz's mining firm BSGR to solvency*, published on the Reuters website, dated March 8, 2018.

16. Attached hereto as Exhibit O is a true and correct copy of an article, *Sarkozy the peacemaker between Conde and Diallo*, published in Issue 796 of Africa Intelligence, dated March 13, 2019.

17. Attached hereto as Exhibit P is a true and correct copy of an article by Franz Wild and Thomas Biesheuvel, *Mining Billionaire Ends Bitter Guinea Dispute After Months of Secret Negotiations*, published on the Bloomberg website, dated February 25, 2019.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 19, 2019,
in New York, New York.

/s/ Lisa M. Schweitzer
Lisa M. Schweitzer

Exhibit H



Published on Government of Bermuda (<https://www.gov.bm>)

[Home](#) > Star West Investments Limited (Maxwell L.H. Quin) - 51720

Company Name

Star West Investments Limited

Registration Number

51720

Directors

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First Name

Maxwell

Middle Name or Initial

L.H.

Surname

Quin

Address:

Victoria Place
31 Victoria Street
Hamilton
Bermuda
HM 10

First Name

Jozef

Middle Name or Initial

C.

Surname

Hendriks

Address:

34 South Road
Southampton
Bermuda
SN 01

First Name

Nicholas

Middle Name or Initial

John

Surname

Hoskins (alternate)

Address:

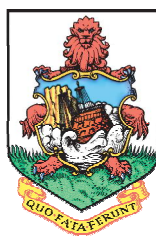
Victoria Place
31 Victoria Street
Hamilton
Bermuda
HM 10

Source URL: <https://www.gov.bm/51720/star-west-investments-limited-maxwell-lh-quin-51720>

Links

[1] <https://www.gov.bm/registrar-of-companies-directory>

Exhibit I



GOVERNMENT OF BERMUDA

Company Name

Americano Nickel Limited

Registration Number

50376

Directors

First Name	Middle Name or Initial	Surname
Jozef	Charles	Hendriks

Address:

34 South Road
Southampton
Bermuda
SN 01

First Name	Middle Name or Initial	Surname
Nicholas	John	Hoskins

Address:

Victoria Place
31 Victoria Street
Hamilton
Bermuda
HM 10

First Name	Middle Name or Initial	Surname
Marcos		Camhis

Address:

22A, Route de Gy
Meinier
Geneva
Switzerland
1252

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Exhibit J



GOVERNMENT OF BERMUDA

Company Name

Americano Nickel Finance Limited

Registration Number

50377

Directors

First Name	Middle Name or Initial	Surname
Maxwell	L.H.	Quin

Address:

Victoria Place
31 Victoria Street
Hamilton
Bermuda
HM 10

First Name	Middle Name or Initial	Surname
Kevin	John	Gold

Address:

5 Kingstown Street
London
United Kingdom
NW1 8JP

First Name	Middle Name or Initial	Surname
Dimitris		Paschos

Address:

Norwood Carriage House'
34 Pitts Bay Road
Pembroke
Bermuda
HM 06

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