

Opus & Best
LAW SERVICES, LLCGrand Central, 100 Park Ave., Suite 1600
New York, NY 10017
opusbest.com • +1 646 355 0845**Invoice**

Date	Invoice #
March 8, 2012	OPB-Mof-33B-12A

Bill To: **Mrs. Monica Rangel da Cruz****National Directorate of Petroleum
Revenue
Ministry of Finance
Dili, Timor-Leste**

	Project	Terms
	ICB-EOI-005-MOF 6-2012	Due upon receipt
Description	Rate	Amount
Final bill in respect of Transfer Pricing Analysis of the LNG arrangements between the Shippers and Owners and more particularly the CRC calculations contained in the amended PCSs 03-12 and 03-13 i in respect of Contract No: RFP-ICB-EO1-005-MOF 6-2012.		
Gross payment (being balance and full payment):		US\$800,000
Timor-Leste Withholding Tax @ 10 per cent (10%):		<u>(US\$80,000)</u>
Amount upon receipt of Invoice:		US\$720,000
TOTAL DUE (Seven Hundred and Twenty Thousand US Dollars only)		US\$720,000
Notes: Remittance by International Wire BUSINESS NAME Opus & Best LLC ADDRESS Grand Central, 100 Park Ave., New York, NY 10017, USA ACCOUNT NUMBER 456370399 BANK NAME JPMorgan Chase Bank, N.A. BANK ADDRESS 1 Chase Manhattan Plaza, New York, NY 10005, USA BANK ROUTING NUMBER 021000021 BANK SWIFT CODE CHASUS33		US\$720,000

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Invoice

Date	Invoice #
Dec. 7th, 2012	OPB-Mof-EOI-2A-006-12

Bill To: Mrs. Monica Rangel da Cruz

**National Directorate of Petroleum
Revenue
Ministry of Finance
Dili, Timor-Leste**

	Project	Terms
	ICB-EOI-006-MOF 11-2012	Due upon receipt
Description	Rate	Amount
Final & balance invoice for Interpretative Guidelines for Chapter IX (TDA) Regulations & Taxation of Bayu-Undan Contractors ACT (TBUCA) Regulations in respect of Contract No: RFP-ICB-EOI-006-MOF 4112012, dated November 14, 2012.		
Gross payment (50% of the contract sum) being balance and full payment.		US\$700,000
Timor-Leste Withholding Tax @ 10 per cent (10%)		<u>(US\$70,000)</u>
Balance upon receipt of Invoice:		US\$630,000
TOTAL DUE (Six Hundred and Thirty Thousand US Dollars)		US\$630,000
Notes: Remittance by International Wire BUSINESS NAME Opus & Best LLC ADDRESS Grand Central, 100 Park Ave., New York, NY 10017, USA ACCOUNT NUMBER 456370399 BANK NAME JPMorgan Chase Bank, N.A. BANK ADDRESS 1 Chase Manhattan Plaza, New York, NY 10005, USA BANK ROUTING NUMBER 021000021 BANK SWIFT CODE CHASUS33		US\$630,000

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Proposal To Provide Accounting / Tax Training Services to
Timor-Leste Ministry of Finance
January 10th 2013

Submitted by:
Fortunare (H.K.) Co., Ltd.

Background

- The Ministry of Finance (“MOF”) of the Government of Timor-Leste intends to initiate a program of training in the subjects of accounting and tax knowledge, within the context of Timor-Leste tax law, to certain of its personnel
- The objectives of the training program include the enhancement of the selected MOF personnel’s knowledge in the areas of accounting and taxation (including international tax concepts), so as to advance their ability in conducting tax audits of taxpayers doing business in Timor-Leste , so as to ensure compliance with the tax law of Timor-Leste

Proposed Program of Training

- The substantive training program will be a series of live training course sessions conducted in a classroom setting over a one (1) year period
- The course contents will include the following:
 - basic accounting and bookkeeping concepts
 - financial statements preparation the flow of accounting data in a commercial enterprise
 - basic taxation concepts, including international taxation
 - basic audit concepts and techniques, from the perspective as a auditor for the MOF
- The course contents will focus on application of the concepts to the interpretation and enforcement of Timor-Leste tax laws

Proposed Program of Training (continued)

- The one year training course will be divided into four (4) sessions with a duration of one to two weeks each, over a one year period, spaced approximately three months apart between the sessions. For example, if the first session should be held in April 2013, then the future sessions will be held in July 2013, October 2013 and December 2013
- It is anticipated that of the four sessions, two to three will be held in Timor-Leste, and one to two will be held in Hong Kong and/or Singapore

Proposed Program of Training (continued)

- The instructors for the training course will be carefully selected, and who will be experienced and knowledgeable in the subject matters, and may include professional accountant(s) and/or lawyer(s)
- All of the course related materials will be provided for (including custom designed course materials) for the MOF participants / students

Timing of the Training Course / Delivery

- Work will begin immediately in the development of materials, selection of course instructors, and arrangement for the HK training site
- Our target for is for the first training session to commence in April 2013 in Timor-Leste
- July 2013 and December 2013 sessions are to be held in Timor- Leste, and the October 2013 session to be held in Hong Kong. Alternatively, it may be possible that the December 2013 session may be held in Singapore instead of Timor-Leste

Fees

- The total fee including the cost of the instructors, course materials will be US\$1,000,000.
- The Hong Kong training facility fee will be based on actual cost. (Assuming that we can secure the facility at the “Joint Professional Services Center”, which is a modern and high quality building with conference room / classroom facility in Central Hong Kong, with a class size of up to 35 people, the cost will be approximately US\$25,000. The Joint Professional Services Center is co-managed by the HK Law Society and the HK CPA Society.)
- Above does not include the travel and living costs of the MOF participants
- Travel costs of the instructors: (To be included in total fee above ?) to be discussed with Bobby

Payment terms:

- | | |
|------------------------------|------|
| • Upon signing of agreement: | 25 % |
| • March 1 2013 | 30 % |
| • July 1 2013 | 30 % |
| • December 1 2013 | 15% |