

INTERNATIONAL CENTRE FOR SETTLEMENT OF INVESTMENT DISPUTES

ICSID CASE NO. ARB/16/42

OMEGA ENGINEERING LLC

and

OSCAR RIVERA

Claimants

v.

REPUBLIC OF PANAMA

Respondent

FIRST WITNESS STATEMENT OF JUAN CARLOS VARELA

7 October 2019

JUAN CARLOS VARELA

[REDACTED]
I, Juan Carlos Varela Rodríguez, residing at [REDACTED]
[REDACTED] hereby declare under oath the following:

1. I am, male, Panamanian, of legal age, an engineer and holder of personal identity card number: [REDACTED]
2. I was elected and held the office of President of the Republic of Panama from July 1, 2014 to June 30, 2019.
3. I have been informed that Mr. Oscar Rivera Rivera has stated that in 2013, while I was a presidential candidate, I asked him for a campaign contribution of six hundred thousand U.S. dollars (US\$ 600,000.00).
4. I hereby declare that the allegation that I requested six hundred thousand U.S. dollars (US\$ 600,000.00) from Mr. Oscar Rivera Rivera as campaign contribution, or in any other concept, is categorically false.
5. While it is true that I knew Mr. Oscar Rivera Rivera, I never requested any amount for my presidential campaign or for any other purpose.
6. If Mr. Oscar Rivera Rivera suspended his investments in Panama, it had absolutely nothing to do with my conduct as President of the Republic of Panama.
7. Any allegation regarding attacks on Mr. Oscar Rivera Rivera or his investments in Panama facilitated by me during my presidential term are totally unfounded and false.

In witness thereof, I submit this Affidavit in Panama, Republic of Panama, on the seventh (7th) day of the month of October of 2019.

(Signed)

Juan Carlos Varela Rodriguez

Id. Card No. [REDACTED]

I, Marlenis Velasco C, Notary Public Twelfth of the Circuit of Panama, holder of Personal Identity Card No. [REDACTED]

CERTIFY

That given the certainty of the identity of the person who signed the present document, his signature is authentic.

Panama, October 08, 2019.

(Signed) Witness

(Signed) Witness

(Signed) NORMA MARLENIS VELASCO C., Notary Public Twelfth

(Notarial Seal)

[Redacted text block containing multiple lines of blacked-out text]