

**UNDER THE CONVENTION ON THE SETTLEMENT OF INVESTMENT DISPUTES
BETWEEN STATES AND NATIONALS OF OTHER STATES AND THE
INSTITUTION RULES AND ARBITRATION RULES OF THE INTERNATIONAL
CENTRE FOR SETTLEMENT OF INVESTMENT DISPUTES, CHAPTER 11 OF THE
NORTH AMERICAN FREE TRADE AGREEMENT, AND
CHAPTER 14 OF THE UNITED STATES-MEXICO-CANADA AGREEMENT**

FINLEY RESOURCES, INC.
MWS MANAGEMENT, INC.
PRIZE PERMANENT HOLDINGS, LLC

Claimants

v.

THE UNITED MEXICAN STATES

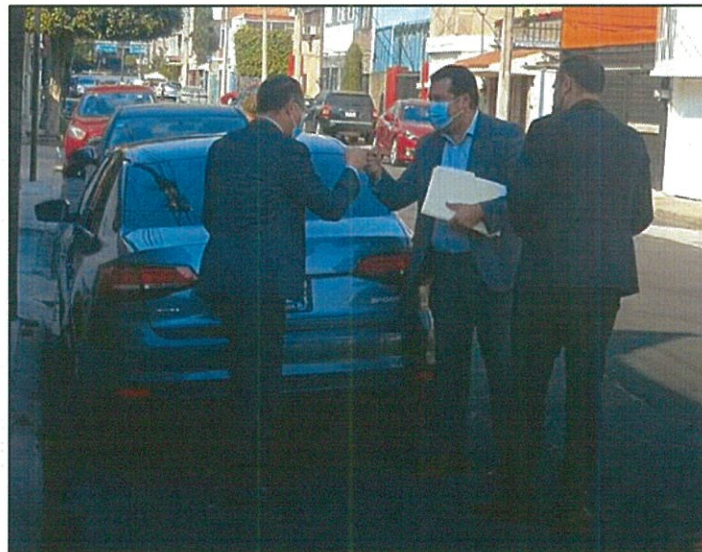
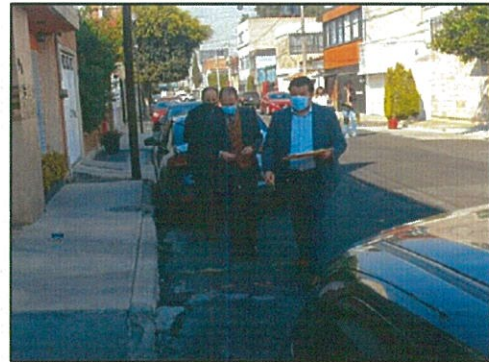
Respondent

STATEMENT OF CRISTINA VIZCAINO

December 18, 2021

1. My name is Cristina Vizcaino. I am the Managing Partner at the law firm Altec, Asesores Legales y Técnicos en Contratos Públicos, S.C. in Mexico City. My address is Corona Boreal 93, Col. Prado Churubusco, Del. Coyoacán, Ciudad de México, C.P. 04230.
2. I have been licensed to practice law in Mexico for nearly 25 years. My practice primarily consists of commercial litigation. Over the past few years, I represented the Claimants in this NAFTA/USMCA arbitration with some of their domestic litigation with Pemex. One representation involved the 821 Contract. However this representation ended.
3. On December 15, 2021, a group of four men appeared at my office in Mexico City. It was around 3 PM.
4. One of the men was a Pemex official. Another was a public notary. The other two men did not identify themselves, but their attire suggested they may be external lawyers for Pemex.
5. The Pemex official demanded that I acknowledge receipt of the “finiquito” of the 821 Contract.
6. I explained that I do not have the authority to receive and sign for these documents. My previous representation of the Claimants in their domestic litigation with Pemex does not change this fact. In response, the Pemex official told me that he obtained my contact information from Secretaría de Economía. I do not know how Secretaría de Economía obtained my contact information or why they were providing it to Pemex. Because the four men came uninvited, I asked them to leave my office.
7. They did not leave. Instead, they lingered in my office and tried to convince me to receive the “finiquito” documents. They then stayed outside for a while. Ultimately, they taped documents to my door.
8. As the Second Vice-President for the Barra Mexicana Colegio de Abogados, it goes against my ethical code to receive documents in the name of a client whom I no longer represent. I informed this to the notary and they removed the documents from my door.
9. On December 16, 2021, three men returned to my office. The Pemex official was an internal attorney and identified himself as Moises Romero Cordero. I had never met this man before. The second was a notary public. The third was a gentleman who was accompanying the notary public.

10. I asked why the men were at my office. They explained that after our encounter the day before they left a citation in my mailbox advising me that they would return. I did not know they had left the citation.
11. As with the previous day, I explained that I do not have the authority to receive documents on behalf of Claimants. I asked the men to leave. The men lingered outside of my office building for approximately 30 minutes. Then, they attached documents to my door and left. Here are a few pictures of these men outside my office:



12. Based on my experience with Pemex, I believe that Pemex will continue this behavior until they are ordered to stop.
13. I, Cristina Vizcaino, hereby affirm that the contents of this statement are true and correct to the best of my knowledge and belief. This statement was originally drafted in English. Because Spanish is my native language, the attorneys at Holland & Knight assisted me with the

preparation of this statement in English. To the extent that I am asked to testify, I intend to do so in Spanish.



Cristina Nizcaino

18/DECEMBER/2021
Date

Ciudad de México
Place