

G.M FUND

COLOMBIA - STAMPA

Telcon 3-28-02 Teacalis, (b)(7) following general advice of situation to RFK about a month ago)

(b)(6) (b)(7) (non FCPA expenses)

Check made out to G.M., 1016 for (b)(6) (b)(7) approved by Controller only (no CAO approval)

G.M. will use for Gastos de Representacion (check on tax implications) - will go to general overhead misc expenses.

G.M. keeps private ledger indicating recipient

G.M. gets and keeps written receipt from Victor

Only these expenses will go through this account

Qty Controller will compile list of (b)(6) (b)(7) transactions and provide to Turso (or his replacement) who will review entries in ledger kept by GM and receipts from (b)(7)

I will review for reasonableness quarterly (no documentation specified at this time)

RFK to be aware of magnitude and advised of significant changes

Teacalis will inform audit committee and EY Cinn (not Colombia)

Discuss with (b)(7) if monthly or biweekly

APPROVED PROCEDURE:

SUPPLIES BY

(b)(6), (b)(7)(C)

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