



**global witness**

**TO:**

**Star Petroleum**  
**Paseo de la Castellana, 42, 8ª ,**  
**28046 – Madrid**

**29 October 2014**

Dear Mr Lacasa,

We welcome your email dated 28 October 2014 responding to our report “Will Star Shine for South Sudan?”, which we will be putting on our website as you requested. We believe that our concerns regarding the negotiations between the government of South Sudan and Star Petroleum still stand.

Much of your email repeats points made in your earlier letters to us which have been fairly reflected in our report. Your letters including those points are already published in full on our website.

Your email raises some new information that we would welcome more details on.

- You state that Star Petroleum participated in a competitive process. The process you now refer to has not been open or public to Global Witness’ knowledge. We would welcome any additional information on this process, the jurisdiction in which it was held, and when.
- You state that our understanding of the ownership of Star Petroleum is wrong as of 2014. We said in our report that we derived information on ownership from your 2007 annual accounts, those being the latest publicly available. We would welcome any additional information on the current ownership structure.

Regarding Mr. Merino, you say that the Spanish Court has not given a definitive resolution but we assume you don’t dispute that he was found guilty of insider trading in 2010 shortly before his appointment as a Star Petroleum director for a second time. We refer to the El Pais article 30 April 2014, footnoted no. 8 in our report.

We disagree with your view that the disclosure of beneficial ownership is irrelevant to citizens. The reasons why this disclosure is very relevant are made clear in box 1 of p. 4 of our report.

Yours sincerely,

Emma Vickers  
Global Witness