

# International Centre for Settlement of Investment Disputes

1818 H Street, N.W., Washington, D.C. 20433, U.S.A.  
Telephone: (202) 458-1534 Faxes: (202) 522-2615/2027  
Website: www.worldbank.org/icsid

August 17, 2011

## By email

Commerce Group Corp. and  
San Sebastian Gold Mine, Inc.  
c/o Mr. John E. Machulak  
Mr. Eugene Bykhovsky  
Machulak, Robertson & Sodos, S.C.  
1733 North Farwell Avenue  
Milwaukee, Wisconsin 53202  
U.S.A.

Republic of El Salvador  
c/o Mr. Derek Smith  
Mr. Luis Parada  
Dewey & LeBoeuf LLP  
1101 New York Avenue NW  
Suite 1100  
Washington, D.C. 20005-4213

**Re: Commerce Group Corp. and San Sebastian Gold Mines, Inc. v. Republic of El Salvador  
(ICSID Case No. ARB/09/17) – Annulment Proceeding**

Dear Mesdames and Sirs,

Further to our letter of August 10, 2011, we now request Commerce Group Corp. and San Sebastian Gold Mines, Inc. to make an initial advance payment to the Centre of US\$150,000. The payment shall be made within 30 days in accordance with the information below:

**International Bank for Reconstruction and Development (IBRD) (Account holder)**

**Account:** IBRT A/C No. 2000192003489  
Wachovia Bank N.A., New York

**Reference:** ICSID Case No. ARB/09/17 – Annulment Proceeding – TF071744 - Payment from Applicants

**Swift Code:** PNBUS3NNYC

When making the payment, your bank should be instructed to include the **reference** text shown above in the payment details (remittance information) field of its SWIFT payment message. This will ensure prompt and accurate application of the funds received to the proper ICSID case escrow account. We also ask you to arrange to forward the details of your payment instructions by email to IBRD's Trust Funds Division at [TFremitadvice@worldbank.org](mailto:TFremitadvice@worldbank.org) with a copy to [mmontanes@worldbank.org](mailto:mmontanes@worldbank.org)

Sincerely yours,



Marco Tulio Montañés-Rumayor  
Secretary of the *ad hoc* Committee

cc: President of the *ad hoc* Committee