



Commander
Seventeenth District

PO Box 25517
Juneau, AK 99802 -5517
Staff Symbol: d
Phone: 907-463-2029
Fax: 907-463-2216
Email:

3860

MAR 27 2007

Rear Admiral Sergei Surin
Northeast Border Directorate
Coast Guard of the Federal Security Service of Russia
ul. Karla Marksa, 1/1
683032, Petropavlovsk-Kamchatskiy, Russia

Dear Admiral Surin:

In order to answer your questions posted on NPCGAS on March 7, 2007, my staff has conducted an inquiry and established the following facts about BELTOK HOLDINGS LLC and other businesses and individuals connected to it, as well as a vessel named JACQUL:

According to the State of Oregon, BELTOK HOLDINGS LLC ("BELTOK") was established in the State of Oregon on 14 November 2004, at 8407 NE Fremont St, Portland, Oregon. This location is currently being used as a small convenience store and is owned by a Hispanic male. Historically this address has been associated with an individual named W. RICK FLETCHER and multiple other, seemingly unrelated companies. The store owner said he has no specific information regarding BELTOK. Moreover, neither BELTOK nor any of its operations or personnel is located at 8407 NE Fremont Street, #229, Portland, Oregon.

BELTOK lists UNITRUST MANAGEMENT, LTD., ("UNITRUST") as its agent. Mailing address for UNITRUST is listed as 942 Windmere Drive NW, Salem, Oregon 97304. An individual named CHARLES F. MATHIAS, who does business as PACIFIC REGISTERED AGENTS, INC., is known to act as an agent for UNITRUST. It must be noted that, both, UNITRUST and PACIFIC REGISTERED AGENTS, INC., have the same address on record.

With the assistance of the Federal Bureau of Investigation (FBI), we were able to establish the following about MATHIAS and his connection to BELTOK:

MATHIAS is the President and Secretary of PACIFIC REGISTERED AGENTS, INC., whose business address is 942 Windemere Drive NW, Salem, Oregon, telephone numbers 1 (800) 535-4828, +1 (503) 362-2361 and fax +1 (503) 362-2361. He is self-employed as a Registered Agent in Oregon, and provides Registered Agent services in Arkansas, California, Colorado, Florida, Georgia, Idaho, Iowa, Kentucky, Montana, Minnesota, Nevada, North Dakota, Ohio, Oklahoma, South Dakota, Tennessee, Texas, Utah, and Washington. He obtains business primarily through his Internet website, www.pacificagents.com, but occasionally gets clients through certain Secretary of State offices.

He currently represents thousands of businesses, including nearly two thousand foreign (internationally based) business organizations. Some of his clients are actually other Registered Agents who use his address. One such Registered Agent is UNITRUST, which may be related to or the same as the entity known as UNITRUST CORPORATE SERVICES LIMITED, based in Ontario, Canada. An individual named ROMAN NIKITOUCHKIN is listed as the President of

UNITRUST MANAGEMENT LIMITED, mailing address for NIKITOUCHKIN is 1600 Steelers Ave, Suite 228, Concord, ON L4K 4M2, Canada.

MATHIAS never obtains more than very cursory information regarding his clients. While he has name and contract information, the State of Oregon requires very little in the way of documentation or information to make an initial filing on behalf of a company. Thus, MATHIAS has never, and will never (according to him), obtain the level of information sought by investigating agencies regarding the companies he represents. Once again, according to him, he does not need that level of specificity and therefore does not request it from his clients.

MATHIAS was unable to provide specific information regarding the activities or business of BELTOK. However, BELTOK has no personnel, operations, or physical plant at 942 Windemere Drive NW, Salem, Oregon, which is MATHIAS' business and residence address. That address is simply used for purposes of filing documents with the Oregon Secretary of State.

The Oregon Secretary of State documents filed on behalf of BELTOK show that its Principal Place of Business was identified as Akara Building, 24 De Castro Street, Wickhams Cay 1, Road Town, Tortola, British Virgin Islands. Its members/managers were identified as INTERNATIONAL CORPORATE GROUP LTS. And RC MANAGEMENT LTD., also using the same address identifies as BELTOK's principal place of business. That address is also used by multiple other, seemingly unrelated companies.

Further, in the course of our enquiry, my staff came across an Oregon corporation named BELTOK LLC. According to the State of Oregon, this corporation was formed on 12 February 2004 and dissolved on 09 April 2004. BELTOK LLC lists MERIDIAN COMPANIES HOUSE ("MERIDIAN"), located at 4825 Futura St, Eugene, OR 97404, mailing address 12260 Willow Grove Rd, Suite 1209E, Camden Wyoming, DE 19934, as its agent. MERIDIAN lists a company named REGISTERED AGENTS LLC, which shares the same address with the above mentioned UNITRUST MANAGEMENT LTD, PACIFIC REGISTERED AGENTS, INC., and lists CHARLES MATHIAS as its agent.

FBI identified an individual named W. RICK FLETCHER, CENTRAL DELAWARE CORPORATE SERVICES, 40B Commerce Street, Harrington, DE 19952 as having a connection to the above listed addresses.

With the assistance of the FBI, we were able to establish the following about the said individual:

FLETCHER is the founder and owner of CENTRAL DELAWARE CORPORTATE SERVICES ("CDCS"), telephone number +1 (877) 441-1956. Other addresses associated with Fletcher are CDCS are 12260 Willow Grove Rd, Bldg #2, Camden-Wyoming, DE; 835 Central Avenue, Suite 402-F, Hot Springs, Arkansas; 8407 NE Fremont Street, #229, Porland, Oregon; 4825 Futura Street, Eugene, Oregon. Fletcher is a Registered Agent and specializes in forming corporations and Limited Liability Companies (LLCs) in Delaware. Fletcher usually acts as the Registered Agent for the companies he forms in Delaware.

Under Delaware Law, a company can be legitimate corporation or LLC without having any physical presence in the State of Delaware. Furthermore, the State of Delaware does not require companies to disclose the identities of its owners or anything about the nature of its business activities. The State of Delaware requires very little in the way of documentation or information for the formation of companies. Delaware law only requires that the company have a designated Registered Agent to act as its representative within the state to accept legal process on behalf of the company.


FLETCHER forms the majority of corporations or LLCs for overseas businesses which are located in various countries. Fletcher primarily communicated with these overseas businesses via the Internet. Typically these businesses will resell the companies which Fletcher has formed for them to their own clients. Reselling corporations or LLCs is legal under Delaware law. Fletcher does not have any information regarding the principals or officers of the companies he forms nor does he have any knowledge regarding the activities of the companies he forms. Other businesses in the same industry as Fletcher will sometime use him to establish their presence in a particular state. For example, MERIDIAN, a company formation business which has several international officers, has used the address of 8407 NE Fremont Street, #229, Portland, Oregon, as a mailing or place of business address.

Therefore, due to lack of solid contact information, for the above outlined reasons, my staff has not able to contact BELTOK HOLDINGS LLC and obtain the information requested in your letter in points number 1 and number 5.

Vessel listed as CFS JACQUL, alternate spellings, as they appear on various documents provided by NEBD, of JACGUEL, JAQUEL and other alternate combinations do not appear in any Coast Guard, commercial and other proprietary databases. Therefore, my staff was unable to establish nationality, ownership and other pertinent information regarding this vessel. According to the FBI, an individual named Adi Maor is listed as one of the principals of MERIDIAN COMPANIES HOUSE mentioned above.

Due to lack of information regarding the vessel JACQUL, my staff is not able to provide information requested in numbers 3, 4, and 5 in your letter.

Sincerely,


S. L. HUDSON
Acting Chief of Staff
U.S. Coast Guard
By direction

Copy: Commander, 17th Coast Guard District (dl)
Kurt Ronnow, FBI, Portland Field Office
Richard Renken, Oregon Division of Finance and Corporate Securities