



State of Israel
Ministry of Justice
Jerusalem

To the Competent Authorities of the Federative Republic of Brazil

Supplemental Request for Legal Assistance in a Criminal Matter

1. In accordance with the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances of 1988, the State of Israel hereby requests that the authorities of the Federative Republic of Brazil (hereinafter: "**Brazil**") grant legal assistance and letters rogatory, in accordance with Brazilian law. This assistance is required in order to procure evidence relating to serious criminal offences, the details of which are set out below.
2. This Supplemental Request supplements the Request for Legal Assistance in a Criminal Matter in the matter of Israeli national Yosef Cohen, dated November 16, 2016, attached hereto (hereinafter: "**the Original Request**"). The details of the Original Request hereby is incorporated into this Supplemental Request.
3. This Supplemental Request is signed and submitted by the Director of the Department of International Affairs in the Ministry of Justice of the State of Israel, who is authorised to submit such requests on behalf of the State of Israel.

Supplemental Statement of Facts

4. As stated in the Original Request, the Israel Police are investigating suspicions that in 2016, Israeli national Yosef (a/k/a Joseph, a/k/a Yossi, a/k/a Yosi) Cohen, d/o/b January 19, 1954, Israeli identity number 051986669, Israeli passport number 14471661 (hereinafter: "**Cohen**") violated provisions of the Israeli law (the Penal Law of 1977, the Dangerous Narcotics Ordinance [New Version] of 1973 and the Prohibition against Money Laundering Law of 2000) in that he participated in a conspiracy to export large quantities of the dangerous narcotic cocaine from places in South America and import said narcotic into Israel, while also committing crimes of money laundering.

According to the evidence gathered to date, Cohen committed his crimes in conspiracy and with the participation of the following persons: **Amos Sulami** (d/o/b May 1, 1952, Israeli I.D. 051219590, Israeli passport 15093335); **Yaakov Israeli (a/k/a Jacob Israeli - d/o/b October 3, 1948, Israeli I.D. 000581496, Israeli passport 13490556); Phlpe Avner Menashe** (d/o/b November 12, 1958, Israeli I.D. 055536916, **apparently does not hold an Israeli passport-** (פג תוקף משנת 1985) 2482641 - פג תוקף- הדרכונים הישראליים שלו פגו תוקף- (פג תוקף משנת 2004) מספר דרכון 89395323, מס' זיהוי בוליביה 0069207, (פג תוקף משנת 2004) (פג תוקף משנת 2004) 8939535 (פג תוקף משנת 2004) 8939535); **Amir Yefet** (d/o/b March 29, 1970, Israeli I.D. 024926420, Israeli passport 21274707); **Moshe Famili** (d/o/b November 16, 1951, Israeli I.D 050832633, Israeli passport 13435601- אין פג תוקף משנת 2014); **Geva Sulami** (d/o/b July 19, 1987, Israeli I.D. 300943495, Israeli passports 11936634, 10937798 and 39004982); **Asam Hagag** (d/o/b October 21, 1974, Israeli I.D. 025814062, Israeli passports 10920169 and 21179588); **Uri Saadon** (d/o/b 17/8/63, Israeli I.D 058307281, Israeli passport 12776664); and **Nayef Abu Assa** (d/o/b March 29, 1981, Israeli I.D. 040896730, Israeli passports 21913224, 23376944 and 29003942). Said persons, along with **Cohen** will be referred to hereinafter as "**the co-conspirators**". As far as known to the Israeli authorities **Phlpe Avner Menashe** **יאות**, and Amir Yefet live in Bolivia.

5. Evidence has been gathered that six of the co-conspirators, made at least two shipments from South America to Israel of the dangerous narcotic cocaine in the respective amounts of 140 kilograms (which were seized by Israeli authorities at the port of entry) and 70 kilograms (which were distributed in Israel). Amos Sulami and Yaacov Israeli succeeded in importing into Israel from South America, in an additional shipment, two kilograms cocaine.
6. Additionally, attempts were made by the co-conspirators to import dangerous narcotics from South America into Israel, and those attempts, known to the Israeli authorities are as follows: a) between October 2015 and May 2016, at least 4 of the co-conspirators made two attempts to import into Israel dangerous narcotics from South America; b) from March 2016 onward, seven of the co-conspirators attempted to import cocaine from South America into Israel in the amount of 500 kilograms. As far as known to the Israeli authorities, the *modus operandi* of the co-conspirators was to export the narcotics from Bolivia into Brazil and export the narcotics from Brazil into Israel, sometimes via Jordan.
7. In 2016, the following co-conspirators arrived in Brazil a number of times: Amos Sulami, Yaacov (Jacob) Israeli, Nayef Abu Assa, Asam Hagag and Geva Sulami. (Cohen arrived in Brazil at least once during 2016). Some, if not all of the co-conspirators travelled from Brazil to Bolivia, in order to supervise the production of the cocaine to be exported via Brazil. Furthermore, Amir Yefet travelled regularly from Bolivia to Brazil **in order to deal with the financing of the narcotics shipments with money that was the fruit of previous narcotics shipments and sales.** (האם זה נכון? תוכלו לפרט יותר? חשוב לתת סקירה). (כללית של שיטת הלבנת הון, ככל האפשר).

על פי הראיות שיש בידנו- אנו רואים שעמוס, נאיף, יעקב ישראלי ומשה פמילי משקיעים כסף בעסקת הסמים (איננו יודעים מהו מקור הכסף שלהם). את הכסף הנ"ל מעביר אורי סעדון, בהוראתו של עמוס, לברזיל (באופן שהוא לא לגמרי ברור לנו, אך כן נוכל להגיד שלמיטב ידיעתנו אין תיעוד במערכת הבנקאית להעברת הכספים, אלא הוא מעביר זאת "כזיכוי"). אמיר יפת מגיע לברזיל ושם אוסף את הכסף ומעבירו לבוליביה (שם מגדלים את הסמים). יש לציין שגם פיליפ מנשה מודע להעברת הכספים, והם מגיעים גם אליו בסופו של דבר.

8. The Brazilian authorities conducted surveillance operations regarding this manner. According to information conveyed to the Israel Police, Amos Sulami, Geva Sulami and Amir Yefet were observed boarding a domestic Brazilian flight on June 10, 2016 (flight from Campinas to Corumba). Also during the surveillance conducted on June 10, 2016, Geva Sulami and Amir Yefet met with **Phlpe Avner Menashe** פלאפ אבנר מנאשה, entered an automobile driven by **Phlpe Avner Menashe** פלאפ אבנר מנאשה, and travelled with him from Brazil to Bolivia, entering Bolivia on the same day.
- 9.
10. On May 25, 2017 an indictment was filed in the District Court of Tel Aviv-Jaffa against the following co-conspirators: Amos Sulami, Yaakov Israeli, Moshe Famili, Uri Saadon and Yossi Cohen). On July 31, 2017 an indictment was filed also against Nayef Abu Assa. The court has been petitioned to join the two above indictments.

Purpose of this Supplemental Request

11. The purpose of this Supplemental Request is as follows: a) to request specific additional evidence for use in Israel's continuing criminal investigation and upcoming trial(s); b) to request the testimony of relevant Brazilian residents during the Israeli trial(s).

Details of the Request

The additional evidence sought:

12. Lists the entrances into Brazil and the departures from Brazil of all of the co-conspirators during the years 2015 and 2016. Please state which of these entrances and departures took place on the border between Brazil and Bolivia. Please note that Cohen's entrances and departures from Brazil, regarding the year 2016 only, were requested in the Original Request and not yet received. The Brazilian authorities hereby are requested to provide a list of Cohen's entrances and departures regarding both 2015 and 2016.

13. All **investigation reports** of the Brazilian authorities, including but not limited to **surveillance reports, photographs and videos**, relevant to this matter. As far as known to the Israeli authorities, Brazilian investigators conducted surveillance and took photos/videos on June 10, 2016; however, if surveillance was conducted on other dates as well, those reports and photos/videos also are requested.
14. Documents/information regarding the co-conspirators' air travel within Brazil **and between Brazil and Bolivia**; and their purchases of tickets for domestic flights **and flights between Brazil and Bolivia**, during the years 2015 and 2016.
האם יש להגביל בקשה זו לטיסות פנים וטיסות לבוליביה? האם ייתכן שהם טסו בין ברזיל
אנחנו מבקשים לדעת גם אם הם טסו בין בוליביה וברזיל. לבוליביה?

The testimony sought:

15. The Brazilian authorities are requested to ask the following persons whether they are willing and able to travel to Israel to testify before the Israeli court during the trial; if so, Israel requests their testimony in person before the court in Tel Aviv; if not, Israel requests their testimony in the afore-reference trial or trials by means of video conferencing:
- a) **A representative of the Golden Tulip Paulista Plaza Hotel**, located at Alameda Santos 85, 01419-000, Sao Paulo, who will be able to testify as to the information provided by the Brazilian authorities in response to the Original Request;
 - b) **A representative of the Brazilian authorities** who will be able to testify regarding the above requested information regarding the entrance into and departures from Brazil of the co-conspirators **and the domestic flights of the co-conspirators within Brazil**; **הוספתי טיסות פנים**;
 - c) **The investigators who conducted the relevant surveillance**, including but not limited to those who took the afore-referenced photographs.
 - d) **If information/documents will be gathered from airlines regarding domestic flights and flights between Brazil and Boliva, and the purchase of tickets**

for those flights, **representatives of those airlines** who will be able to testify regarding said information/documents.

לא ביקשתם עדות זו, אך ייתכן שיהיה צורך לכך? האם יש צורך בעדות בעניין טיסות בינ"ל?

Confidentiality

16. The Brazilian authorities are requested to maintain confidentiality in order not to jeopardize the on-going Israeli investigation.

Urgency

17. The Brazilian authorities are requested to grant this assistance in an urgent manner, as indictments already have been filed in Israel.

Supplementary

18. The assistance requested is necessary for the trial of the co-conspirators.

19. The State of Israel will submit any additional information, which the authorities of Brazil may require in order to enable them to accede to this Request.

20. Inquiries regarding the matters set forth in this request should be directed to Attorney Nina Mansur of the Department of International Affairs in the Office of the State Attorney. Her telephone number is 972-2-5419609, mobile phone number is 972-506216206, fax number is 972-2-5419644 and her e-mail address is NinaH@justice.gov.il.

21. The State of Israel takes this opportunity to express its appreciation to the Brazilian for their assistance in this case and to assure reciprocity.

Jerusalem, this ____ day of _____, 2017
, this ____ day of Elul, 5777

Yuval Kaplinsky
Director
Department of International Affairs
Office of the State Attorney
Ministry of Justice
State of Israel