## Earthsight | The Fixers | References | September 2022

- [1] In Portuguese. "veja que Deus faz as coisa certinha trouxe o cara na minha porta aqui", pp5, MP Estado do Paraná
- [2] Vvale, 'MP pede investigação de políticos e funcionários do IAP', 24 Jan 2017, available at: <a href="https://www.vvale.com.br/geral/mp-pede-investigacao-de-politicos-e-funcionarios-do-iap/">https://www.vvale.com.br/geral/mp-pede-investigacao-de-politicos-e-funcionarios-do-iap/</a> (accessed on 31 March 2022)
- [3] Pinnacle Floors, 'Indusparquet Brazilian Exotic Hardwood Flooring', undated, available at: <a href="https://www.originalhardwood.com/brands/indusparquet-hardwood-flooring/">https://www.originalhardwood.com/brands/indusparquet-hardwood-flooring/</a> (accessed on 1 Sept 2022)
- [4] Floor Covering News, 'IndusParquet: Building a brand with familiar products', 31 Jan 2011, available at: <a href="https://www.fcnews.net/2011/01/4900-2/">https://www.fcnews.net/2011/01/4900-2/</a> (accessed on 1 Sept 2022)
- [5] Testimony of General Manager of Masterpiso in court hearing claims he does not deal with the purchase of timber, and that this is done exclusively by Baggio. On another occasion in the same hearing he states that for 49 years, Baggio was the one dealing with purchases. This is also corroborated by testimony of the IP employee accused in the Sao Paulo case, who says Baggio was in charge of wood purchasing.
- [6] From court documents, Sonalio (fellow IAP agent who worked with Aleixo), asserted that the system was integrated to Sinaflor in May 2017. Until then, a forest engineer would inspect the area and, based on his report, IAP regional chiefs would issue the permit. This is what happened to the rural producer's permit that was signed by Aleixo in 2015. This was presented by prosecutors as being further indication that Aleixo's role at the environment agency and the knowledge of local suppliers he held as a result was crucial to his alleged involvement in the negotiations to help secure the bracatinga for Indusparquet.
- [7] Acao Penal (page 40) as part of the 1500 page document (in this case, page 1483)
- [8] US Congress Library, 'Brazil Improbity Law amended', 26 Oct 2021, available at: <a href="https://www.loc.gov/item/global-legal-monitor/2021-11-09/brazil-administrative-improbity-law-amended/">https://www.loc.gov/item/global-legal-monitor/2021-11-09/brazil-administrative-improbity-law-amended/</a> (accessed on 26 May 2022)
- [9] Brazilian Public Class Action Law No. 7,347/85; See New Directions for Public Civil Action in Brazil, May 2021. Available at:
- https://www.lickslegal.com/post/new-directions-for-public-civil-action-in-brazil (accessed on 1 Sept 2022)
- [10] Brazilian Improbity Law No. 8,429/1992. See: The Law Reviews, 'The Anti-Bribery and Anti-Corruption Review: Brazil' 10 Dec 2021, available at:
- https://thelawreviews.co.uk/title/the-anti-bribery-and-anti-corruption-review/brazil#:~:text=8%2C4 29%2F1992%20 (accessed on 1 Sept 2022)

[11] Law no. 12,846/2013. The Act imposes strict civil and criminal liability for bribery and makes it illegal to promise, offer, or give, directly or indirectly, an undue advantage to a public agent or to a related third person. See: Trench, Rossi e Watanabe, 'Brazil's Clean Company Act: How U.S., U.K., and Global Models May Influence Enforcement', 14 July 2014, available at: <a href="https://www.bakermckenzie.com/-/media/files/insight/publications/2015/10/global-issue-spotting-for-automotive-parts/brazilcleancompanyact.pdf?la=en">https://www.bakermckenzie.com/-/media/files/insight/publications/2015/10/global-issue-spotting-for-automotive-parts/brazilcleancompanyact.pdf?la=en</a> (accessed on 1 Sept 2022)

[12] According to the case filed by the State prosecutors, Aleixo was prosecuted for violating Brazil's Penal Code, articles 317 and 327. The article describes as prohibited conduct the act of using public office to request or receive an undue advantage. It is not necessary that the private individual accept the proposal, the request is sufficient for the crime to be characterized. The public servant may also be punished in the case of yielding, at the request or under the influence of a third party, even if not receiving an advantage. Baggio was charged under article 333 of the Code, which provides that the simple act of offering an undue advantage is a criminal offence. To characterize the crime it is not necessary that the bribe be accepted, the offer or promise is enough.

See: TJDFT, ACS, 'Corrupção passiva e corrupção ativa', undated 2019, available at: <a href="https://www.tjdft.jus.br/institucional/imprensa/campanhas-e-produtos/direito-facil/edicao-semanal/corrupcao-passiva-e-corrupcao-ativa">https://www.tjdft.jus.br/institucional/imprensa/campanhas-e-produtos/direito-facil/edicao-semanal/corrupcao-passiva-e-corrupcao-ativa</a> (accessed on 10 May 2022)

- [13] "Eles tão com pressa já me ligou essa semana pra você ter uma idéia umas três vezes sabe, até agora a pouco me ligou o outro comprador deles o EVANDRO se realmente saiu, eu falei com o seu ZÉ ANTÔNIO ele já pode fecha e até já deve ter fechado essa semana o pedido lá, só que daí eles tão ainda eles tão meio com receio, me perguntou de volta se deu certo, digo pode ficar sossegado".
- [14] "Ontem eu tentei falar com você desse detalhe que com certeza hoje o Zé Antônio vai me ligar, né... que ele tinha me ligado na quinta-feira".
- [15] "Já mande a propostinha da minha comissão também (risos)". Zé Antônio: "Isso com certeza, claro, claro, não nisso é logico, você pode fica nosso comprador na região porque eu to na expectativa que vai vende bem isso dai né, entendeu?"
- [16] "Vamos fazer o seguinte, mesmo que você ache o cara que tem a autorização, vamos passar pro Puzyna lá, eu prefiro que cada um cuide de uma linha"
- [17] "Eu vou pra Curitiba amanhã (...) vou pedir [para ele] fazer amanhã, que agora quem faz é tudo por Curitiba, daí eu vou estar lá amanhã no IAP daí o cara arruma". The person named is understood to be the civil servant in charge of uploading documents on Sinaflor system
- [18] Aleixo, as the investigation reveals, was also using not only his working hours but his office in the environment agency for the timber negotiations held to source wood for Indusparquet. On numerous occasions, the evidence suggests that he invited Puzyna and Granatyr to come to his office to discuss their deal.

- [19] o ZÉ ANTONIO me ligou não era nem oito horas pra você ter idéia (...) ele precisa porque o material que ele tem lá não é suficiente pra ele fazer o que ele combinou com os cara e ele ta preocupado.
- [20] DOF [Document of Forest Origin] is the term for a timber transport permit.
- [21] This information is also recorded in the court records.
- [22] Apart from the wood purchased from the rural producer's farm, Granatyr had also bought another 10m³ of bracatinga timber from another company that has not been investigated as part of this process.
- [23] "Nós sabemos muito bem disso, que a gente mexe com o Ibama muito tempo, obedece essa legislação, que jamais um funcionário público pode fazer. Mas a gente ignorava que ele era um funcionário público".
- [24] "Eu tinha falado com o Luiz para mandar mandeira também, mas não sabia de nenhuma ligação entre os dois".
- [25] In the court hearing, Baggio said: "As far as I remember, we bought (from Granatyr) earlier, 2 or 3 months earlier". [English translation] However, Ibama database reveals transactions that took place between Dec 2016 and March 2017
- [26] Judge Emerson Luciano Prado Spak
- [27] See: Bonde, 'IAP nomeia novo chefe regional para Londrina', 05 Mar 2015, available at: <a href="https://www.bonde.com.br/bondenews/parana/iap-nomeia-novo-chefe-regional-para-londrina-363462.html">https://www.bonde.com.br/bondenews/parana/iap-nomeia-novo-chefe-regional-para-londrina-363462.html</a> (accessed on 31 Mar 2022); See also: Gazeta Informativa, 'Prefeitura cogita criar consorcio para expedição de licencas ambientais', 30 Nov 2015, available at: <a href="http://www.gazetainformativa.com.br/prefeitura-cogita-criar-consorcio-para-expedição-de-licencas-ambientais/">http://www.gazetainformativa.com.br/prefeitura-cogita-criar-consorcio-para-expedição-de-licencas-ambientais/</a> (accessed on 31 Mar 2022); See also: Colmeia, 'Ibama e IAP realizaram a Operação Arrastao', 10 Sep 2015, available at: <a href="https://colmeia.am.br/ibama-e-iap-realizaram-a-operação-arrastao-na-represa-foz-do-areia/">https://colmeia.am.br/ibama-e-iap-realizaram-a-operação-arrastao-na-represa-foz-do-areia/</a> (accessed on 31 Mar 2022)
- [28] Witness 1, a timber trader, says: "After a while, Ze (Baggio) called me asking if I knew someone by the name of André Aleixo. At the moment, I couldn't remember. So, I tried to ask some friends if someone knew this person but no one did". (Passou um tempo, o Ze ligou para mim perguntando se eu conhecia uma pessoa com o nome de André Aleixo. Eu, no momento, não me recordei. Ai, fui tentar perguntar a uns amigos se alguém conhecia essa pessoa. E ninguém conhecia); Witness 2, a timber trader, says: "He (Baggio) called to ask about the wood, if I had it, and to ask about this André" (Ligou para perguntar sobre a madeira, se eu tinha, e para perguntar sobre esse André); Witness 3, a timber trader, says: "Ze Antonio (Baggio) asked me one day if I knew this person; I don't, I have never seen him" (O Ze Antonio perguntou para mim um dia se eu conhecia essa pessoa; eu não o conheço, nunca nem vi).

- [29] These three witnesses were also questioned by Indusparquet's lawyer about how Baggio is informally known in the industry, the use of expressions "my boss" or "my friend" and discussions around asking for or offering a commission when trading timber.
- [30] On Sep 26th 2016, Aleixo addressed Baggio as "my friend" [English translation] as included in the civil lawsuit.
- [31] Witness 4, from the sales department, says: "I receive an average of 30 calls a day" (Eu recebo uma media de 30 ligacoes dia); Witness 5, a receptionist/sales department assistant, says: "At the time I was at the reception, (Baggio received) about 30 (calls), apart from the mobile phone ones" (Na epoca em que eu ficava na recepcao, umas 30, for as do cellular); Alessandro Faria, MasterPiso manager, says: "I get at least 30 calls a day" (Eu recebo cerca de no minimo 30 ligacoes diarias). Following the hearing, Earthsight discovered that one of these employees, witness 4, also appears as a shareholder of a company Indusparquet opened in Mato Grosso.
- [32] The Nature Conservancy, 'The Atlantic Forest', undated, available at: <a href="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/">https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/</a> (accessed 2 July 2022)
- [33] The Nature Conservancy, 'The Atlantic Forest', undated, available at: <a href="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="https://www.nature.org/en-us/get-involved/how-to-help/places-we-protect/atlantic-forest/#:~:text="ht
- [34] Mittermeier, R., Turner, W., Larsen, F., Brooks, T. and Gascon, C. (2011) 'Global Biodiversity Conservation: The Critical Role of Hotspots'. In: Zachos, F., Habel, J. (eds) Biodiversity Hotspots. Springer, Berlin, Heidelberg. Available at: https://doi.org/10.1007/978-3-642-20992-5\_1
- [35] Mittermeier, R., Gill, P., Hoffmann, M., Pilgrim, J., Brooks, J., Mittermeier, C.J., Lamourux, J. and Fonseca, G. (2005) Hotspots revisited: earth's biologically richest and most endangered terrestrial ecoregions. CEMEX, Washington
- [36] World Resources Institute, 'The Other Brazilian Rainforest: Why Restoring the Atlantic Forest Can Help Tackle Climate Change', 14 August 2019, available at: <a href="https://www.wri.org/insights/other-brazilian-rainforest-why-restoring-atlantic-forest-can-help-tackle-climate-change">https://www.wri.org/insights/other-brazilian-rainforest-why-restoring-atlantic-forest-can-help-tackle-climate-change</a> (accessed 1 Sept 2022)
- [37] SOS Mata Atlântica Foundation and Inpe (2022) Atlas dos Remanescentes Florestais da Mata Atlântica: Período 2020-2021, Technical report, SOS Mata Atlântica Foundation: São Paulo.
- [38] SOS Mata Atlântica Foundation, 'DESMATAMENTO NA MATA ATLÂNTICA CRESCE 66% EM UM ANO', 24 May 2022, available at:

https://www.sosma.org.br/noticias/desmatamento-na-mata-atlantica-cresce-66-em-um-ano/ (accessed 1 Sept 2022)

[39] Both Puzyna and Granatyr corroborated Aleixo's statement that he planned to leave his job at the environmental agency. The conversations recorded by the wiretaps however do not appear to corroborate this claim. Further, it appears irrelevant as the negotiations occurred while he was still in office. Granatyr, for his part, said he was surprised when both Aleixo and Puzyna changed their minds only a few months after visiting a small property where the timber was not thick enough to be sawn and, therefore, would not work for what Indusparquet was expecting to receive. The negotiations, he explained, went ahead without Aleixo and Puzyna's help. This contradicts what was recorded by the authorities. In addition to the wiretaps, the testimony of one of the witnesses called by the Public Prosecutor's Office weakened the argument that Granatyr was the only one of the defendants to negotiate with Indusparquet. rural producer of the farm where the bracating logs for Granatyr's mill were finally sourced (as transport permits show), was questioned about a phone call on November 7 2016, when he contacted Aleixo informing that the trucks wouldn't be able to leave his farm because of heavy rain. He stated, damningly, that he had called Aleixo because he could not reach Granatyr or Puzyna This is further indication that Aleixo was involved in negotiations despite the involvement of Puzyna to intermediate.

## [40] Jusbrasil

on 4 Apr 2022

https://www.jusbrasil.com.br/topicos/10598684/artigo-317-do-decreto-lei-n-2848-de-07-de-deze mbro-de-1940

[41] Casa e Jardim, 'Conheca empresas e designers que trabalham com madeira certificada', 10 Jun 2021, available at: <a href="https://revistacasaejardim.globo.com/Casa-e-Jardim/Arquitetura/Revestimento/Madeira/noticia/2">https://revistacasaejardim.globo.com/Casa-e-Jardim/Arquitetura/Revestimento/Madeira/noticia/2</a> 021/06/conheca-empresas-e-designers-que-trabalham-com-madeira-certificada.html, accessed

[42] Aleixo was accused of benefiting from alleged undue advantages by prosecutors investigating a corruption scheme involving IAP officials and businessmen who were trying to obtain environmental licenses in União da Vitória. . See: VVale.com.br, 'MP pede investigação de politicos e funcionários do IAP', 24 January 2017, available at:

https://www.vvale.com.br/geral/mp-pede-investigacao-de-politicos-e-funcionarios-do-iap/, accessed 12 May 2022.

[43] Colmeia. 'Chefe da Sejuf, André Luis Aleixo tira duvidas sobre o programa Comida Boa', 11 May 2020, available at:

https://colmeia.am.br/chefe-da-sejuf-andre-luis-aleixo-tira-duvidas-sobre-o-funcionamento-do-programa-comida-boa/ (accessed on 01 Apr 2022)

See also: Aleixo's facebook page: <a href="https://www.facebook.com/andreluis.aleixo">https://www.facebook.com/andreluis.aleixo</a>, (accessed on 31 Mar 2022)

[44] As mentioned in the interview with State prosecutor Juliana Mitsue Botomé "He is a lawyer in the environmental area. There is another case in which he is the lawyer of criminals in the environmental area". [English translation] Original in Portuguese: "Ele advoga na área ambiental. Tem outro processo em que ele eh advogado de pessoas criminosas na área ambiental".

[45] Paragraph contains personal details found in a federal prosecutor's office document forming part of the evidence in the civil case (Justiça Federal da 3ª Região, process number 5001069-34.2021.4.03.6108), in which the federal public ministry sets out its complaint against: MARKUS OTTO ZERZA, MARISA DOS SANTOS ZERZA, ALBERTO ANTONIO CEZAR and THAIS CRISTINA TEIXEIRA BRASIL, the latter a partner of the company sharing the same name. Page 5 of the document contains the following description of Zerza [translated by Earthsight from its original Portuguese]: "MARKUS OTTO ZERZA, Brazilian, married, Environmental Analyst at IBAMA, son of Gerhard Zerza and Ursula Zerza, born on 07/28/1965, born in São Paulo/SP, bearer of identity document no. [details redacted by Earthsight] with address at [details redacted by Earthsight] Vila Progredior, São Paulo/SP".

[46] In Jan 2017, 9,000 BRL per month = 2,760 USD

[47] Ibama's Diretoria de Proteção Ambiental (Dipro) report 44/2017, analysing information obtained through the breach of telematic security (emails) with procedures operationalised in the DOF system. The report forms part of the evidence submitted as part of civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região). In its introduction, page 3 of the document makes reference to two personal email accounts bearing the name Markus Zerza.

[48] Excerpt from email from Markus Otto Zerza to "Cezar Indusparquet" at 7.15pm local time on 29 March 2014, as contained in the annexes to Ibama's Diretoria de Proteção Ambiental (Dipro) report 44/2017, which form a separate document included as part of the evidence in civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região): "ve se anota esse endereço na tua agenda.....vc vai usar ele muito ainda.....hahahahahahahaha". (Email found on page 8 of the document submitted as evidence in the case.)

[49] Date of birth for ALBERTO ANTONIO CEZAR recorded as 3 March 1958 in page 5 of the federal prosecutor's office document forming part of the evidence in the civil case (Justiça Federal da 3ª Região, process number 5001069-34.2021.4.03.6108), in which the federal public ministry sets out its complaint against: MARKUS OTTO ZERZA, MARISA DOS SANTOS ZERZA, ALBERTO ANTONIO CEZAR and THAIS CRISTINA TEIXEIRA BRASIL, the latter a partner of the company sharing the same name.

[50] Excerpt from Ibama's Diretoria de Proteção Ambiental (Dipro) report 44/2017 (which forms part of the evidence submitted as part of civil case 5001069-34.2021.4.03.6108) [translated by Earthsight from its original Portuguese]: "Based on the procedures for approval, release and adjustment of yards and forced delivery, extension of the validity period, suspension, reactivation and cancellation of DOF and GF guides, 988 services were performed by MARKUS between 2014 and 2016, the period covered for breach of telematic secrecy. Of these, as shown

in the table in item 3.13, at least 106 are directly related to e-mail messages that mention payment of amounts." (See page 57 of the document submitted as evidence in the case.)

[51] Ibid.

[52] Excerpt from a Federal Police document providing a brief history of Operation Patio, contained in a collection of Federal Police records generated under the Operation and submitted in a single document as evidence in civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região) [translated by Earthsight from its original Portuguese]: "Based on the aforementioned records of IPL N° 332/2016-DPF/BRU/SP, according to the analysis of telematic communications intercepted with judicial authorization and other elements that corroborate that investigative effort, several (at least one hundred) of illegal operations promoted in the SISDOF/IBAMA system, which were improperly inserted by that federal public servant, upon payment of economic advantage (money), allowing the irregular releases of yards, including fictitious ("ghosts") in favor of the companies timber companies (more than 100, so far) represented by the intermediaries, which make up the financial nucleus investigated, with the consequent granting of fraudulent credits for products of forest origin in the aforementioned SISDOF/IBAMA." (See page 156 of the document submitted as evidence in the case.)

[53] Ibama, 'Ibama realiza maior apreensão de madeira ilegal da Amazônia em SP', 1 Jun 2018, available at

http://www.ibama.gov.br/noticias/436-2018/1479-ibama-realiza-maior-apreensao-de-madeira-nativa-da-amazonia-em-sp (accessed 21 Jun 2022)

[54] Earthsight, 'US flooring giant buying tropical wood from Brazilian firm at centre of illegal timber scandal', 18 Nov 2018, available at

https://www.earthsight.org.uk/news/timberleaks/us-flooring-giant-buying-tropical-wood-brazil-firm-illegal-timber-scandal (accessed on 21 Jun 2022)

[55] Ibid.

[56] Ibama, 'Ibama realiza maior apreensão de madeira ilegal da Amazônia em SP', 1 Jun 2018, available at:

http://www.ibama.gov.br/noticias/436-2018/1479-ibama-realiza-maior-apreensao-de-madeira-nativa-da-amazonia-em-sp (accessed 21 Jun 2022)

[57] The SISDOF timber accounting system created in 2006 was integrated into SINAFLOR in 2014

[58] Earthsight, 'Untamed Timber: The Brazilian flooring giant let off the hook by Bolsonaro's government and now thriving across the US and EU', 2 Feb 2021, available at: <a href="https://www.earthsight.org.uk/news/investigations-brazil-untamed-timber">https://www.earthsight.org.uk/news/investigations-brazil-untamed-timber</a> (accessed on 22 Jun 2021)

[59] Processo 5001069-34.2021.4.03.6108 - 2ª Vara Federal Bauru (Notícia de Fato nº 1.34.003.000028/2021-16)

[60] Excerpt from federal prosecutor's public civil action against INDUSPARQUET INDUSTRIA E COMERCIO DE MADEIRAS LTDA, BAURUPISOS LTDA, THAIS CRISTINA TEIXEIRA BRASIL, ULIMAX ESQUADRIAS DE MADEIRA EIRELI, INDUSTRIA MADEIREIRA ULIANA LTDA, DEMARCHI & CIA. LTDA. ME, and FAURTIL FABRICA DE URNAS TIETE LTDA., which is also referred to as JONACIR AMORIM (process number 5001069-34.2021.4.03.6108, 2ª Vara Federal Bauru) [translated by Earthsight from its original Portuguese]: "And the elements of conviction are strong in the sense that ALBERTO ANTONIO CEZAR and IBAMA's public servant, MARKUS OTTO ZERZA, agreed to the releases and approvals of "Patios" of the companies named here, in a totally unlawful manner, bypassing the legal procedures and procedures that would be necessary before IBAMA for this purpose. And this associative spirit (affectio societatis sceleris), which united them to practice unlawful acts against the public administration took place through acts of corruption, as MARKUS, requested and received undue advantages, to practice such acts of office (with a breach of legal duty), advantages that were offered and effectively implemented by ALBERTO ANTONIO CEZAR." (See page 8 of the accompanying document submitted in court.)

[61] Excerpt from the federal prosecutor's office document forming part of the evidence in the civil case (Justiça Federal da 3ª Região, process number 5001069-34.2021.4.03.6108), in which the federal public ministry sets out its complaint against: MARKUS OTTO ZERZA, MARISA DOS SANTOS ZERZA, ALBERTO ANTONIO CEZAR and THAIS CRISTINA TEIXEIRA BRASIL, the latter a partner of the company sharing the same name [translated by Earthsight from its original Portuguese]: "In testimony to the police authority, the accused ALBERTO ANTONIO CEZAR [...] stated that he works in the purchasing department of the company Indusparquet Ind. and with. of Madeira Ltd. and, therefore, has contacts with sectors of public bodies, to resolve pending issues related to DOF blocks and met the accused MARKUS OTTO ZERZA when he worked in the DOF sector of IBAMA in São Paulo." (See page 21 of the document submitted as evidence in the case.)

[62] Excerpt from federal prosecutor's public civil action against INDUSPARQUET INDUSTRIA E COMERCIO DE MADEIRAS LTDA, BAURUPISOS LTDA, THAIS CRISTINA TEIXEIRA BRASIL, ULIMAX ESQUADRIAS DE MADEIRA EIRELI, INDUSTRIA MADEIREIRA ULIANA LTDA, DEMARCHI & CIA. LTDA. ME, and FAURTIL FABRICA DE URNAS TIETE LTDA., which is also referred to as JONACIR AMORIM (process number 5001069-34.2021.4.03.6108, 2ª Vara Federal Bauru) [translated by Earthsight from its original Portuguese]: "ALBERTO was an employee - billing assistant - of INDUSPARQUET IND. AND WITH. DE MADEIRAS LTDA. and allegedly provided services to the other defendant companies as an environmental advisor/consultant". (See page 8 of the accompanying document submitted in court.)

[63] Excerpt from a Federal Police report identifying individuals, companies and officials cited or involved in emails exchanged by Markus Otto Zerza and his contacts related to the approval/release of timber yards and other related matters, in which there are signs of irregularities, as contained in a second collection of Federal Police records generated under Operation Patio and submitted in a single document as evidence in civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região) [translated by Earthsight from its original Portuguese]: "The exchange of messages with Markus Otto Zerza indicates that Alberto

Antonio Cezar provides services or is an employee of the Indusparquet company but also advises other timber companies." (See page 87 of the document submitted as evidence in the case.)

[64] Excerpt from the federal prosecutor's office document forming part of the evidence in the civil case (Justiça Federal da 3ª Região, process number 5001069-34.2021.4.03.6108), in which the federal public ministry sets out its complaint against: MARKUS OTTO ZERZA, MARISA DOS SANTOS ZERZA, ALBERTO ANTONIO CEZAR and THAIS CRISTINA TEIXEIRA BRASIL, the latter a partner of the company sharing the same name [translated by Earthsight from its original Portuguese]: "In testimony to the police authority, the accused ALBERTO ANTONIO CEZAR [...], stated that he works in the purchasing department of the company Indusparquet Ind. and with. of Madeira Ltd. and, therefore, has contacts with sectors of public bodies, to resolve pending issues related to DOF blocks and met the accused MARKUS OTTO ZERZA when he worked in the DOF sector of IBAMA in São Paulo." (See page 21 of the document submitted as evidence in the case.)

[65] Ibid.

- [66] Phrase in quotation marks is found numerous times throughout the federal prosecutor's office document forming part of the evidence in the civil case (Justiça Federal da 3ª Região, process number 5001069-34.2021.4.03.6108), in which the federal public ministry sets out its complaint against: MARKUS OTTO ZERZA, MARISA DOS SANTOS ZERZA, ALBERTO ANTONIO CEZAR and THAIS CRISTINA TEIXEIRA BRASIL, the latter a partner of the company sharing the same name.
- [67] Excerpt from Ibama's Diretoria de Proteção Ambiental (Dipro) report 44/2017 (which forms part of the evidence submitted as part of civil case 5001069-34.2021.4.03.6108) [translated by Earthsight from its original Portuguese]: "Based on the procedures for approval, release and adjustment of yards and forced delivery, extension of the validity period, suspension, reactivation and cancellation of DOF and GF guides, 988 services were performed by MARKUS between 2014 and 2016, the period covered for breach of telematic secrecy. Of these, as shown in the table in item 3.13, at least 106 are directly related to e-mail messages that mention payment of amounts." (See page 57 of the document submitted as evidence in the case.)
- [68] Excerpt from Ibama's Diretoria de Proteção Ambiental (Dipro) report 44/2017 (which forms part of the evidence submitted as part of civil case 5001069-34.2021.4.03.6108) [translated by Earthsight from its original Portuguese]: "It is noteworthy that these 106 records showed inconsistencies when analyzed under the aspects of duly filed documentation, verification of the physical existence of the enterprise and relevance of carrying out the action to IBAMA." (See page 57 of the document submitted as evidence in the case.)
- [69] Excerpt taken from page 57 of Ibama's Diretoria de Proteção Ambiental (Dipro) report 44/2017 (which forms part of the evidence submitted as part of civil case 5001069-34.2021.4.03.6108).

[70] Excerpt from a Federal Police report on the arrest and interrogation of Markus Otto Zerza on 24 May 2018, contained in a collection of Federal Police records generated under Operation Patio and submitted in a single document as evidence in civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região) [translated by Earthsight from its original Portuguese]: "That he [Zerza] admits to having received undue monetary advantages to facilitate the release of patios and other irregular movements in SISDOF for Alberto Antonio Cezar, expressed in deposits in his wife's bank account". (See page 23 of the document submitted as evidence in the case.)

[71] Excerpt from a Federal Police report on the arrest and interrogation of Markus Otto Zerza on 24 May 2018, contained in a collection of Federal Police records generated under Operation Patio and submitted in a single document as evidence in civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região) [translated by Earthsight from its original Portuguese]: "That he [Zerza] acknowledges that he continued to operate SISDOF after 29/09/2014, when the administrative management was transferred to the Secretariat of Environment of São Paulo". (See page 22 of the document submitted as evidence in the case.)

[72] Federal prosecutor de Oliveira Machado in an interview with Earthsight and Mongabay, July 2021.

[73] Excerpt from federal prosecutor's office document forming part of the evidence in the civil case (Justiça Federal da 3ª Região, process number 5001069-34.2021.4.03.6108), in which the federal public ministry sets out its complaint against: MARKUS OTTO ZERZA, MARISA DOS SANTOS ZERZA, ALBERTO ANTONIO CEZAR and THAIS CRISTINA TEIXEIRA BRASIL, the latter a partner of the company sharing the same name [translated by Earthsight from its original Portuguese]: "It can still be seen from MARISA 's bank details that dozens of other credits that were made to her account were not identified (IP page 1892, Id 36019963)." (See page 24 of the document submitted as evidence in the case.)

[74] The annexes to Ibama's Diretoria de Proteção Ambiental (Dipro) report 44/2017, which form a separate document included as part of the evidence in civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região), contain an email Cezar forwarded to Zerza on 25 August 2014, in which an Ulimax representative\_writes as follows: "Cezar, bom dia!

"Cezar, desculpa a demora, segue anexo a planilha e o requerimento, vou te mandar o valor de R\$ 2.200,00 conforme combinado, e qualquer dúvida estou à disposição, fico no aguardo, obrigada Andréa." (See page 8 of the document submitted as evidence in the case.)

[75] Excerpt from a federal prosecutor's office document forming part of the evidence in the civil case (Justiça Federal da 3ª Região, process number 5001069-34.2021.4.03.6108), in which the federal public ministry sets out its complaint against: MARKUS OTTO ZERZA, MARISA DOS SANTOS ZERZA, ALBERTO ANTONIO CEZAR and THAIS CRISTINA TEIXEIRA BRASIL, the latter a partner of the company sharing the same name [translated by Earthsight from its original Portuguese]: "Cezar denied the payment of bribes and when confronted with the message forwarded to Markus (in relation to the bank details shared), he said he asked Markus to buy a

used mobile phone in the city of Bauru, but it did not work out." (See page 25 of the document submitted as evidence in the case.)

[76] Ibid.

[77] The email exchange is recorded in the annexes to Ibama's Diretoria de Proteção Ambiental (Dipro) report 44/2017, which form a separate document included as part of the evidence in civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região). (See page 9 of the document submitted as evidence in the case.)

[78] Details taken from Ibama's Diretoria de Proteção Ambiental (Dipro) report 44/2017, which analysed information obtained through the breach of telematic security (emails) with procedures operationalised in the DOF system. The report forms part of the evidence submitted as part of civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região). Page 16 of the accompanying document submitted as evidence in the case contains this excerpt [translated by Earthsight from its original Portuguese]: "CEZAR "forwards' emails to MARKUS with the documents to proceed with what is requested, charging the companies for the service."

[79] The federal prosecutor's lawsuit and publicly-available information indicates Indusparquet and its corporate co-defendants are closely connected.

The legal action apparently frames this assertion on information provided by Ibama based on DOF transactions between the companies.

Two firms mentioned in the lawsuit – Ulimax and Uliana – are owned by members of the Uliana family, the namesakes of one of Indusparquet's owners, Luiz Francisco "Kiko" Uliana. A similar-named company based in Paraná state Uliana Pisos e Portas, claims to be an Indusparquet distributor.

Indusparquet, Ulimax and Uliana also appear as co-defendants in a 2019 labour case filed by a former Uliana employee who alleges he also worked for the other two firms. The suit identifies Ulimax and Uliana as Indusparquet subsidiaries.

Most of the companies named in the lawsuit, except Baurupisos and Tais Cristina Teixeira Brasil, are based in Tietê, including Indusparquet. Ulimax, Uliana and Faurtil and are all registered to addresses along a short stretch of road in Tietê. Demarchi is also based nearby, in a different part of town.

Baurupisos and Indusparquet also appear together in two legal actions apparently related to intellectual property disputes with other companies. (Details of which can be accessed via https://www.jusbrasil.com.br/processos/nome/241588329/bauru-pisos-ltda.)

[80] Excerpt from federal prosecutor's public civil action against INDUSPARQUET INDUSTRIA E COMERCIO DE MADEIRAS LTDA, BAURUPISOS LTDA, THAIS CRISTINA TEIXEIRA BRASIL, ULIMAX ESQUADRIAS DE MADEIRA EIRELI, INDUSTRIA MADEIREIRA ULIANA LTDA, DEMARCHI & CIA. LTDA. ME, and FAURTIL FABRICA DE URNAS TIETE LTDA., which is also referred to as JONACIR AMORIM (process number 5001069-34.2021.4.03.6108, 2ª Vara Federal Bauru) [translated by Earthsight from its original Portuguese]: "Furthermore, for at least three of them, the INDUSTRY MADEIREIRA ULIANA, FAURTIL FABRICA DE URNAS TIETE

LTDA. (or JONACIR AMORIM) and BAURU PISOS LTDA., IBAMA discovered that they had partnerships and/or commercial ties with INDUSPARQUET, which denotes that his agent and employee ALBERTO ANTONIO CEZAR, also acted to benefit his employer." (See page 26 of the accompanying document submitted as part of the case.)

[81] Details taken from section 3: "DOS FATOS ESPECÍFICOS" of the federal prosecutor's public civil action against INDUSPARQUET INDUSTRIA E COMERCIO DE MADEIRAS LTDA, BAURUPISOS LTDA, THAIS CRISTINA TEIXEIRA BRASIL, ULIMAX ESQUADRIAS DE MADEIRA EIRELI, INDUSTRIA MADEIREIRA ULIANA LTDA, DEMARCHI & CIA. LTDA. ME, and FAURTIL FABRICA DE URNAS TIETE LTDA., which is also referred to as JONACIR AMORIM (process number 5001069-34.2021.4.03.6108, 2ª Vara Federal Bauru). See pages 8 to 30 of the accompanying document submitted as part of the case.

[82] Ibama initially reported 10,740 cubic metres, see: https://www.earthsight.org.uk/news/timberleaks/us-flooring-giant-buying-tropical-wood-brazil-firm-illegal-timber-scandal

[83] Information taken from Ibama's response to a 01/02/2021 request from the federal prosecutor's office for information regarding the movement of wood between Indusparquet, Ulimax, Uliana, Demarchi, Jonacir and Baurupisos over the period 2014 to 2015. The federal prosecutor's office's request and Ibama's reply are included in a document forming part of the evidence in the civil case (Justiça Federal da 3ª Região, process number 5001069-34.2021.4.03.6108). See page 4 of the accompanying document submitted as evidence in the case.

[84] Information taken from Ibama's response to a 01/02/2021 request from the federal prosecutor's office for information regarding the movement of wood between Indusparquet, Ulimax, Uliana, Demarchi, Jonacir and Baurupisos over the period 2014 to 2015. The federal prosecutor's office's request and Ibama's reply are included in a document forming part of the evidence in the civil case (Justiça Federal da 3ª Região, process number 5001069-34.2021.4.03.6108). See pages 4 to 5 of the accompanying document submitted as evidence in the case.

[85] Excerpt taken from page 1 of the federal prosecutor's office rebuttal ID 105487543, which concerns Indusparquet, one of the defendants in civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região), and forms part of the case files in the civil case [translated by Earthsight from its original Portuguese].

[86] Excerpt taken from a Federal Police report on the arrest and interrogation of Alberto Antonio Cezar on 24 May 2018, contained in a third collection of Federal Police records generated under Operation Patio and submitted in a single document as evidence in civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região) [translated by Earthsight from its original Portuguese]. See page 55 of the document submitted as evidence in the case.

- [87] Excerpt taken from a Federal Police report on the arrest and interrogation of Alberto Antonio Cezar on 24 May 2018, contained in a third collection of Federal Police records generated under Operation Patio and submitted in a single document as evidence in civil case 5001069-34.2021.4.03.6108 (Justiça Federal da 3ª Região) [translated by Earthsight from its original Portuguese]. See page 56 of the document submitted as evidence in the case.
- [88] Federal prosecutor de Oliveira Machado in an interview with Earthsight and Mongabay, July 2021.
- [89] Law No. 12,846/2013.
- [90] Federal prosecutor de Oliveira Machado in an interview with Earthsight and Mongabay, July 2021.
- [91] PORTARIA Nº 75, DE 4 DE MARÇO DE 2021
- O MINISTRO DE ESTADO DO MEIO AMBIENTE, no uso da competência que lhe foi delegada pelo art. 1°, inciso I, do Decreto n° 3.035, de 27 de abril de 1999, e tendo em vista o que consta dos Processos Administrativos n° 02000.000106/2021-71 e n° 02001.015129/2018-75, resolve:
- Aplicar a penalidade de demissão ao servidor MARKUS OTTO ZERZA, Analista Ambiental, matrícula SIAPE nº 1365114, do quadro de Pessoal do Instituto Brasileiro do Meio Ambiente e dos Recursos Naturais Renováveis-IBAMA, por infringência ao art. 116, incisos I, II e III; ao art. 117, incisos IX e XII, da Lei n. 8.112, de 11 de dezembro de 1990, e ao art. 9º, inciso
- I, da Lei nº 8.429, de 2 de junho de 1992, com fundamento no art. 132, incisos IV e XIII, da Lei n. 8.112, de 1990.
- [92] Based on a price of \$7 per square foot for solid ipe flooring of 3/4" thickness found at this link: <a href="https://www.advantagelumber.com/flooring.htm">https://www.advantagelumber.com/flooring.htm</a>; and assuming a 50% recovery rate from log to finished solid flooring, and assuming all 226,760m3 was ipe, then the wood seized would, when converted into flooring, have a US retail value of \$448,417,900 i.e. nearly half a billion US dollars
- [93] From Alexandre Saraiva's written testimony to the Supreme Court, April 2021.
- [94] Letter from Alexandre Saraiva, Regional Superintendent of Police for the State of Para, to the Brazilian Supreme Court, dated April 14th 2021.
- [95] Based on an analysis of Brazilian timber trading data.
- [96] The company was fined in 2016, 2017, 2018 and 2019. Data taken from Ibama's online database for fines and embargoes, available at:
- http://www.ibama.gov.br/fiscalizacao-ambiental/autuacoes-ambientais (accessed on 1 Sept 2022)

[97] From the cutting permit, or Autef, for the property.

[98] Saraiva's testimony to the Human Rights and Legislative Participation Commission on 26 April 2021. Saraiva is invited to speak about the accusations against Ricardo Salles, available at: <a href="https://www.camara.leg.br/evento-legislativo/61156">https://www.camara.leg.br/evento-legislativo/61156</a> (accessed on 1 Sept 2022)

[99] Based on an analysis of documents of forest origin (DOFs).

[100] Based on an analysis of documents of forest origin (DOFs). Only data up to August 2021 was available at the time the research was conducted.

[101] FUNAI Ordinance No. 38 of 01/11/2011, available at: <a href="https://www.normasbrasil.com.br/norma/portaria-38-2011\_229404.html">https://www.normasbrasil.com.br/norma/portaria-38-2011\_229404.html</a> (accessed on 1 Sept 2022)

[102] The Amazon and the Future of Brazil, LEMA and Smoke Signal, August 2022

[103] Biblioteca Florestal, Charlyngton da Silva e Silva, 'Áreas protegidas como ferramenta de contenção do desmatamento: um estudo de caso da Terra do Meio', July 2013, available at: <a href="http://www.bibliotecaflorestal.ufv.br/handle/123456789/8441">http://www.bibliotecaflorestal.ufv.br/handle/123456789/8441</a> (accessed on 1 Sept 2022)

[104] As part of the studies carried out during the planning and implementation of the Belo Monte project, the management group formed by state-owned utilities companies Eletrobrás and Eletronorte and three of Brazil's largest construction companies worked together with Funai on a document called "Analysis of the Indigenous Component of Environmental Impact Studies" that was released in September 2009. The document has a sub-chapter dedicated to uncontacted indigenous peoples. The coordinator of the study, anthropologist Regina Polo Müller, reported that another tribe, the Asurini people of Xingu have been noticing the presence of uncontacted people in the region since the 1970s.

[105] The licence was issued in 2011. The hydropower has been in operation since 2016 while the demarcation process has yet to take place

[106] Based on IBGE, Census 2000 and Altamira's Planning Institute, 2012.

See: José Queiroz de Miranda Neto e José Antônio Herrera, 'Altamira-PA: novos papéis de centralidade e reestruturação urbana a partir da instalação da UHE Belo Monte', Confins [Online], 28 | 2016, available at: <a href="http://confins.revues.org/11284">http://confins.revues.org/11284</a>; DOI: 10.4000/confins.11284, pp.9 (accessed on 13 May 2022)

[107] According to Para State Prosecutors, five people were involved in Stang's assassination. Only one of them is still behind bars. Brazil's Pastoral Land Commission (Comissao Pastoral da Terra) reports that 23 people were murdered between 2005 and 2019 in conflicts for land rights. Source: Após 15 anos da morte de Dorothy Stang, a impunidade ainda persiste em Anapu - Amazônia Real (amazoniareal.com.br).

See also: Mongabay, Sam Cowie, 'On anniversary of nun's murder Amazon land rights activists at high risk', 27 Feb 2020, available at:

https://news.mongabay.com/2020/02/on-anniversary-of-nuns-murder-amazon-land-rights-activists-at-high-risk/ (accessed 13 May 2022)

[108] Earthsight identified 97 cubic metres from three shipments of Cumaru and Ipe wood cut in Morro Alto farm and sold to Indusparquet by MadBrasil. Canoer supplied 40.94 cubic metres of jatoba wood to Indusparquet that was sourced from the same farm within the reserve.

[109] Total of fines against both owners for both properties, available at: <a href="https://docs.google.com/document/d/1J8-sAy6U16r">https://docs.google.com/document/d/1J8-sAy6U16r</a> XjB54 e8esso1szI1HXp/edit

[110] COAIB / OPI, 'Relatório Técnico Sobre Desmatamento e Invasões na Terra Indígena Ituna-Itatá', 28.01.22, available at:

https://s3.amazonaws.com/appforest\_uf/f1643374516342x435063167696644800/Relat%C3%B 3rio\_T%C3%A9cnico\_Sobre\_Desmatamento\_e\_Invas%C3%B5es\_na\_Terra\_Ind%C3%ADgena \_Ituna-Itat%C3%A1.pdf (accessed on 1 Sept 2022)

[111] Guerreiro Neto, G., Deutsch Welle, 'Fogo, grileiros e gado ameaçam terra de indígenas isolados', 19 Oct 2020, available at:

https://www.dw.com/pt-br/fogo-grileiros-e-gado-amea%C3%A7am-terra-de-ind%C3%ADgenas-isolados-que-liderou-desmatamento/a-55301595 (accessed on 28 September 2022)

[112] ibid

[113] Greenpeace Brazil, 'Ituna-Itatá: uma terra indígena da Amazônia tomada por ganância e destruição' 11 May 2022, available at:

https://www.greenpeace.org/brasil/ituna-itata-uma-terra-indigena-da-amazonia-tomada-por-ganancia-e-destruicao/ (accessed on 1 Sept 2022)

[114] UOL, Rubens Valante, 'Funai cogita reduzir área no Para com vestígios de índios isolados', 27 Nov 2020, available at :

https://noticias.uol.com.br/colunas/rubens-valente/2020/11/27/reducao-terra-indigena-governo-bolsonaro-para.htm (accessed on 03 Mar 2022)

See also: Survival, 'Povo indigena isolado sob ameaça após plano secreto de senador para abrir seu territorio', 1 Dec 2020, available at:

https://www.survivalbrasil.org/ultimas-noticias/12512 (accessed on 13 May 2022)

[115] ABC News, Mauricio Savarese, 'Activists see threat to territory for isolated indigenous', 01 Dec 2020, available at:

https://abcnews.go.com/International/wireStory/activists-threat-territory-isolated-indigenous-744 86819 (accessed on 13 May 2022)

[116] The researchers identified three records of uncontacted Indigenous people. Among them, there was a ceramic pot, a tortoise shell treated differently to how it is by non-indigenous people

in the region, and remains of indigenous ceramics, as well as various cuts in the vegetation. See: UOL, Rubens Valante, 'Senador discutiu relatório restrito com Funai antes de terra ser liberada', 28 Jan 2022, available at:

https://noticias.uol.com.br/colunas/rubens-valente/2022/01/28/senador-terra-indigena-para-isola dos-portaria.htm (accessed on 1 Sept 2022)

[117] Open Democracy, 'Funai politizada põe em risco indígenas não contatados', 21 Feb 2022, available at: <a href="https://www.opendemocracy.net/pt/funai-politizada-ameaca-indigenas-isolados/">https://www.opendemocracy.net/pt/funai-politizada-ameaca-indigenas-isolados/</a> (accessed on 13 May 2022)

[118] This total amount includes \$7.8 million in criminal fines, \$969,175 in criminal forfeiture, \$1.23 million in community service payments and more than \$3.15 million in additional forfeitures. See: US Department of Justice, 'Press Release: Lumber Liquidators Inc. Sentenced for Illegal Importation of Hardwood and Related Environmental Crimes', 1 Feb 2016, available at:

https://www.justice.gov/opa/pr/lumber-liquidators-inc-sentenced-illegal-importation-hardwood-and-d-related-environmental (accessed on 1 Sept 2022)

[119] US media coverage of a Greenpeace action regarding a shipment of allegedly illegally sourced mahogany from Brazil. See, for example: Orlando Sentinel, 'Activists protest mahogany', 13th April 2002, available at:

https://www.orlandosentinel.com/news/os-xpm-2002-04-13-0204130472-story.html (accessed on 1 Sept 2022)

[120] Floor Covering News, 'Indusparquet: What you don't know may surprise you', 19th Feb 2021, https://www.fcnews.net/2021/02/indusparquet-what-you-dont-know-may-surprise-you/ (accessed on 1 Sept 2022)

[121] Weight 24,533 tonnes including its concrete base. See: US National Park Service, 'Statue of Liberty: Statue Statistics', undated, available at:

https://www.nps.gov/stli/learn/historyculture/statue-statistics.htm (accessed on 1 Sept 2022)

[122] Based on typical selling prices in the US for Indusparquet flooring products, per kilogram.

[123] Floor and Decor, 'Floor & Decor Holdings, Inc. Announces Fourth Quarter and Fiscal 2021 Financial Results', 24 Feb 2022, available at:

https://ir.flooranddecor.com/news-events/press-releases/detail/122/floor-decor-holdings-inc-announces-fourth-guarter-and (accessed on 1 Sept 2022)

[124] The same line at the heart of the 2018 story about Floor and Decor's connections to Indusparquet: See: Earthsight, 'US flooring giant buying tropical wood from Brazilian firm at centre of illegal timber scandal', 18 Nov 2018, available at:

https://www.earthsight.org.uk/news/timberleaks/us-flooring-giant-buying-tropical-wood-brazil-firm-illegal-timber-scandal (accessed on 1 Sept 2022)

[125] Lumber Liquidators Inc, 'Lacey Act Compliance Framework', undated, available at: <a href="https://cdn.ymaws.com/www.iwpawood.org/resource/resmgr/Files/LL">https://cdn.ymaws.com/www.iwpawood.org/resource/resmgr/Files/LL</a> Inc ECP 9 25 2015.pdf (accessed on 1 Sept 2022)

[126] Based on typical selling prices in the US for Indusparquet flooring products, per kilogram.

[127] The Indonesian Journal of Geography, Rorai P. Martins Neto, Antonio M. G. Tommaselli, Nilton N. Imai, Adilson Berveglieri, Mariana B.Thomaz, Gabriela T. Miyoshi, Baltazar Casagrande, Raul. B. Guimarães, Eduardo A. W. Ribeiro, Eija Honkavaara, Mariana B. Campos, Raquel A. de Oliveira, Hassan C. David, 'Structure and tree diversity of an inland Atlantic Forest - A case study of Ponte Branca Forest Remnant, Brazil', 15th May 2002, available at:

https://www.researchgate.net/publication/361365301\_Structure\_and\_tree\_diversity\_of\_an\_inland\_Atlantic\_Forest-A\_case\_study\_of\_Ponte\_Branca\_Forest\_Remnant\_Brazil (accessed on 1 Sept 2022)

[128] Mongabay, Rhett A. Butler, 'Computer hackers are helping illegal loggers destroy the Amazon rainforest', 12 December 2008, available at:

https://news.mongabay.com/2008/12/computer-hackers-are-helping-illegal-loggers-destroy-the-amazon-rainforest/ (accessed on 1 Sept 2022)

[129] Forest Trends, Dummett, C. & Blundell, A., 'Illicit Harvest, Complicit Goods: The State of Illegal Deforestation for Agriculture', May 2021, available at:

https://www.forest-trends.org/wp-content/uploads/2021/05/Illicit-Harvest-Complicit-Goods\_rev.pd f (accessed on 1 Sept 2022)

[130] Imazon, 'More Than Half of the Area With Logging in Para Has Not Been Authorised by Environmental Agencies', 14 Sept 2021, available at:

https://imazon.org.br/imprensa/mais-da-metade-da-area-com-exploracao-madeireira-no-para-na o-foi-autorizada-pelos-orgaos-ambientais/ (accessed on 1 Sept 2022)

[131] Gatti, L. V., Basso, L. S., Miller, J. B., Gloor, M., Gatti Domingues, L., Cassol, H. L., ... Neves, R. A. (2021). Amazonia as a carbon source linked to deforestation and climate change. Nature, 595(7867), 388-393. doi:10.1038/s41586-021-03629-6

[132] IMAZON, cited in WWF, 'Razing the land to feed massive timber hunger: Fuelled by high demand for timber products, legal and illegal logging are important drivers of Amazon rainforest destruction', undated, available at:

https://wwf.panda.org/discover/knowledge\_hub/where\_we\_work/amazon/amazon\_threats/other\_threats/logging\_amazon/ (accessed on 1 Sept 2022)

[133] Mongabay, Juliana Ennes, 'Illegal logging reaches Amazon's untouched core, 'terrifying' research shows' 15 Sept 2021, available at:

https://news.mongabay.com/2021/09/illegal-logging-reaches-amazons-untouched-core-terrifying-research-shows/ (accessed on 1 Sept 2022)

[134] Human Rights Watch, 'Brazil's Own Data Shows Amazon Fines Unenforced', 22nd May 2020, available at:

https://www.hrw.org/news/2020/05/22/brazils-own-data-shows-amazon-fines-unenforced (accessed on 1 Sept 2022)

[135] Ruggiero, P., Pfaff, A., Nichols, E., Rosa., M. and Metzger, J.P. (2021) 'Election cycles affect deforestation within Brazil's Atlantic Forest', Conservation Letters, 14(5). Available at: <a href="https://doi.org/10.1111/conl.12818">https://doi.org/10.1111/conl.12818</a> (accessed on 1 Sept 2022)

[136] European Commission, 'Conclusions of the Competent Authorities for the implementation of the European Timber Regulation (EUTR) on the application of Articles 4(2) and 6 of the EUTR to timber imports from Brazil', Annex to the summary record of the 2nd Commission Expert Group/MultiStakeholder Platform on Protecting and Restoring the World's Forests, including the EU Timber Regulation and the FLEGT Regulation in its composition limited to Member States (EG) Meeting of 9 December 2020, 9 December 2020, available at: <a href="https://ec.europa.eu/environment/forests/pdf/201209%20EUTR%20EG%20Country%20conclusions\_Brazil\_final.pdf">https://ec.europa.eu/environment/forests/pdf/201209%20EUTR%20EG%20Country%20conclusions\_Brazil\_final.pdf</a>