

**ECONOMIST JUAN MIGUEL AVILES MURILLO, BILLING AGENT OF THE
INTERNAL REVENUE SERVICE SOUTHERN COAST:**

DR. SYLKA SANCHEZ CAMPOS, in my condition as Legal Procurator of Attorney **ALVARO FERNANDO NOBOA PONTON**, in the collection procedure **No. RLS-03855-2102**, I say to you:

You insist to provide actions and order several measures within an administrative procedure which is suspended by express legal mandate, in this case, as provided by Article 214 of the Organic Tax Code, in other words, you have decided to execute and order “de facto” measures legally desimpowered , causing lasting harm to natural and legal persons who are objects of your administrative arbitrariness. Your actions are regrettable, because, the responsibility that you have implied to the State is serious and substantial, according to what is prescribed in Article 11, sub-paragraph subsequent to number 9, of the Constitution of the Republic and that will fall, finally, on you after the right of recourse that must be followed against you, in the appropriate moment, by the oversight bodies of the State.

Nevertheless, your insistence in acting against the express law, which manifests, in an unstopabble way, in your orders contaminated with nullity, is making you to bypass judgements issued within the substantiation of jurisdiccional guarantees of constitutional nature, providing on March 20 of 2013, at 16h30, that “*from this date, the prohibition to leave the country against Mr. ALVARO FERNANDO NOBOA PONTON*”, in other words, reiterating the constitutional act that should be declared by the judgement issued within the action of habeas corpus issued by the Judge of the Especialized Unit No.4 of Family, Women, Childhood and Adolescence of Guayaquil on March 20 of 2013, at 11h39.

This willingness of yours towards the abuse of public power has only managed to constitute an act that, in a conspicuos and manifestly manner, is flawed with unconstitutionality, because, it is elementary that you or your advisers know the ripple effects of the habeas corpus judgement, above-mentioned, the same that cover all uniform acts which reiterate the violation to the fundamental right of liberty and whose integral reparation was already ordered which contains, of course, “*the guarantee for the action not to be repeated*”, as expressly stipulated in Article 18 of the Organic Law of Jurisdictional Guarantees and Constitutional Control.

You will understand, in the not too distant future, the harmful effects for the Ecuadorian State – and also for yourself – what is that your superiors turned you into an instrument of the administrative and political persecution against Attorney Alvaro Noboa Ponton, to the extreme of making you issue actions that violated the fundamental rights, legally void, as sanctioned by Article 84 of the Constitution of the Republic.

Reflect on your actions and proceed to declare the annulment by operation of law of the absurd, illegal and arbitrary restrictive measure against my freedom, that you have issued, to make matters worse, within a procedure that is, *ipso iure*, suspended.

Please provide,

IS JUSTICE,

Dr. Sylka Sanchez Campos

LEGAL PROCURATOR