

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

LEX CLAIMS, LLC,  
JACANA HOLDINGS I, LLC,  
JACANA HOLDINGS II LLC,  
JACANA HOLDINGS III LLC,  
JACANA HOLDINGS IV LLC,  
JACANA HOLDINGS V LLC,  
MPR INVESTORS LLC,  
ROLSG, LLC, AND  
SL PUERTO RICO FUND II L.P.

16-02374 (FAB)

CLERK'S OFFICE  
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SAN JUAN, P.R.

COMPLAINT AND  
DECLARATORY AND  
INJUNCTIVE RELIEF

CLERK'S OFFICE  
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SAN JUAN, P.R.

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PLAINTIFFS

V.

RICARDO ROSELLO NEVAREZ\*  
in his official capacity as Governor of the  
Commonwealth of Puerto Rico.

RAUL MALDONADO GAUTIER\*  
in his official capacity as Secretary of the  
Treasury of the Commonwealth of Puerto Rico.

JOSE I. MARRERO ROSADO\*  
In his official capacity as Director of the  
Office of Management and Budget of the  
Commonwealth of Puerto Rico.

\* presently holding these positions

THE PUERTO RICO SALES TAX  
FINANCING CORPORATION (COFINA)

JUAN VAQUER  
In his Official capacity as Executive Director  
Of the Puerto Rico Sales Tax Corporation and

BANK OF NEW YORK MELLON CORP.

DEFENDANTS

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**SUPPLEMENTARY MOTION TO MOTION TO INTERVENE AND  
REQUESTING DECLARATORY JUDGMENT**

**TO THE HONORABLE U.S. DISTRICT COURT FOR THE DISTRICT OF P.R.  
(HUSDCDPR):**

Comes now, the Intervenor, Angel Ruiz Rivera, appearing here Pro Se (PS) and *In Forma Pauperis* (IFP) and respectfully States, Alleges and Prays as follows:

Enclosed please find copy of a Table With A Detail Of Revenues Vis A Vis The Debt of the P.R. Government from 2000 to 2012 which should serve to give a graphic idea to the HDCDPR and the parties of what we are dealing with.

So I State, Allege and Pray. Respectfully submitted, today, March 15, 2017.

#### CERTIFICATE OF SERVICE

I, Angel Ruiz Rivera, putative Intervenor, appearing here *Pro Se* and *In Forma Pauperis* (IFP) hereby certify that I have sent a copy of this Motion To Intervene by e-mail to all the appearing attorneys of record for all the parties according to the docket record.



Angel Ruiz Rivera  
Intervenor  
Pro Se and IFP  
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Bayamon, P.R. 00959.  
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787-779-9222.

EXHIBIT

TABLE

	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
Revenues or Collections		6,962,134	7,454,399	7,841,742	7,985,388	8,305,669	8,541,238	8,862,451	8,359,031	7,710,187	7,716,140	8,158,316	8,667,885
Present and previous year revenues			14,416,533	15,296,141	15,827,130	16,291,057	16,846,907	17,403,689	17,221,482	16,069,218	15,426,327	15,874,456	16,826,201
Average 2 years revenues			7,208,267	7,648,071	7,913,565	8,145,529	8,423,454	8,701,845	8,610,741	8,034,609	7,713,164	7,937,228	8,413,101
15% margen Constitution allowed			1,081,240	1,147,211	1,187,035	1,221,829	1,263,518	1,305,277	1,291,611	1,205,191	1,156,975	1,190,584	1,261,965
Two year average + 15% margin			8,289,506	8,795,281	9,100,600	9,367,358	9,686,972	10,007,121	9,902,352	9,239,800	8,870,138	9,127,812	9,675,066
Constitutional Debt _ 1/		5,573,000	5,584,000	6,022,000	6,879,000	7,307,000	7,276,000	8,167,000	8,759,000	9,006,000	9,511,000	9,682,000	10,945,000
Debt over 15% Constitutional margin											-640,862	-554,188	-1,269,934
Absolute Difference vs.previous year			11,000	438,000	857,000	428,000	-31,000	891,000	592,000	247,000	505,000	171,000	1,263,000
Percentual difference			5.00%	6.30%	10.60%	6.20%	-0.40%	12.20%	7.20%	2.80%	5.60%	1.8%	13.0%
			0.20%										
Municipal Debt _ 2 /		1,632,000	1,796,000	1,955,000	2,046,000	2,181,000	2,330,000	2,463,000	2,819,000	2,997,000	3,231,000	3,537,000	3,872,000
Percentual change			10.00%	8.90%	4.70%	6.60%	6.80%	5.70%	14.50%	6.30%	7.80%	9.50%	9.50%
Public Corporations		13,699,000	15,124,000	15,890,000	18,041,000	19,234,000	20,450,000	24,159,000	26,342,000	26,641,000	27,288,000	28,118,000	30,801,000
Absolute Difference			1,425,000	766,000	2,151,000	1,193,000	1,216,000	3,709,000	2,183,000	299,000	647,000	830,000	2,683,000
Percentual change			10.40%	5.10%	13.50%	6.60%	6.30%	18.10%	9.00%	1.10%	2.40%	3.00%	9.50%
Constitutional + Public Corps. Debt		19,272,000	20,708,000	21,912,000	24,920,000	26,541,000	27,726,000	32,326,000	35,101,000	35,647,000	36,799,000	37,800,000	41,746,000
Legislative assignments _ 3 /		4,310,000	5,193,000	5,640,000	6,977,000	7,981,000	9,558,000	5,204,000	2,683,000	2,760,000	2,575,000	3,070,000	3,160,000
			883,000	447,000	1,337,000	1,004,000	1,577,000	-4,354,000	-2,521,000	77,000	-185,000	495,000	90,000
Percentual change			20.50%	8.60%	23.70%	14.40%	19.80%	-45.60%	-48.40%	2.90%	-6.70%	19.20%	2.90%
COFINA _ 4/			0	0	0	0	0	2,825	6,329	11,576	14,218	14,535	15,982
Absolute Difference									3,504	5,247	2,642	317	1,447
Percentual Change										82.90%	22.80%	2.20%	10.00%
Subtotal		25,214,000	27,967,000	29,707,000	33,944,000	36,703,000	39,614,000	42,818,000	46,932,000	52,980,000	56,823,000	58,942,000	64,760,000
Absolute Difference			2,753,000	1,740,000	4,237,000	2,759,000	2,911,000	3,204,000	4,114,000	6,048,000	3,843,000	2,119,000	5,818,000
Percentual Change			10.90%	6.20%	14.30%	8.10%	7.90%	8.10%	9.60%	12.90%	7.30%	3.70%	9.90%
Nonbinding debt		1,945,000	2,046,000	2,818,000	3,491,000	3,565,000	3,523,000	3,365,000	6,461,000	5,435,000	5,383,000	5,337,000	5,188,000
Absolute Difference			101,000	772,000	673,000	74,000	-42,000	-158,000	3,096,000	-1,026,000	-52,000	-46,000	-149,000
Percentual Change			10.90%	10.90%	10.90%	10.90%	10.90%	10.90%	10.90%	10.90%	10.90%	10.90%	10.90%
Total		27,160,000	30,033,000	32,525,000	37,434,000	40,268,000	43,136,000	46,183,000	53,393,000	58,415,000	62,206,000	64,279,000	69,948,000

Fuente: Oficina de Gerencia y Presupuesto

\_ 1/ Se incluye deuda emitida según la Constitución del Estado Libre Asociado de Puerto Rico. No incluye deuda garantizada por el Gobierno Central emitida por Corporaciones Públicas.

\_ 2/ Deuda de las subdivisiones políticas de Puerto Rico, limitada por ley por márgenes prestatarios y capacidad de repago.

\_ 3/ Deuda extraconstitucional incurrida por el gobierno cuyo pago no compromete el poder de imponer impuestos del estado, pagadera de asignaciones específicas de la Legislatura.

\_ 4/ Se refiere a la Corporación del Fondo de Interés Apremiante cuya deuda es pagadera del Impuesto sobre las Ventas y Uso (IVU).

Copied from: Informe presentado ante la Comisión Interamericana de Derechos Humanos, "Deuda Pública, Política Fiscal Y Pobreza en P.R.", p.15.

La Clínica Internacional de Derechos Humanos de la Facultad de Derecho de la Universidad Interamericana de P.R. y El Instituto Caribeño De Derechos Humanos (ICADH)

This report was written by various authors who are identified in each part and are the editors of its final form, Annette M. Martínez Orabona, Keila Toledo Nieves, Jessica Perez Salazar

Absolute difference figures not in original version added by Angel Ruiz Rivera. *Revenues from GDB Statements*

*and present and previous years revenues  
and Average 2 years revenues.  
and 15% margin Constitution allowed  
Two year average + 15% margin*