

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	Criminal No. 2:18-CR-00099
	§	
SEA WORLD MANAGEMENT &	§	
TRADING, INC.	§	

**DETAINED CREWMEMBERS' MOTION FOR WHISTLEBLOWER AWARD**

COMES NOW the twelve detained crewmembers of the *M/T SEA FAITH*, Mark Jayson Bernardo De Roxas, Gilbert Rosario De La Cruz, Herbert Evangelista Guzman, Manuel Perlito Jamin Herrera, Christian John Flores Jarlos, Jerome Sunga Taruc, Michael Eric Maranan, Paulo A. De La Punta, Eliseo C. Feliciano, Reynaldo E. Valles, Jovy E. Gonzalo, and Everett Moises T. Artes, by and through their undersigned counsel, and respectfully file and submit this their Motion for Whistleblower Award requesting this Honorable Court to:

- 1) Adopt the Government's recommendation for designation of six crewmen as 'whistleblowers;'
- 2) Adopt the Government's recommendation as to apportionment of the award among the six whistleblower designees;
- 3) Order one-half of the criminal fine imposed (the statutory maximum and customary award) to be paid pursuant to the Act to Prevent Pollution from Ships (APPS), 33 U.S.C. § 1908(a);
- 4) Approve Counsel's written 6% contingent fee agreement and the detained crewmembers prior unanimous "Agreement" for an equitable offset to non-whistleblower crewmembers;

- 5) Order an appropriate award to the Abandoned Seafarers Fund; and
- 6) Approve the Government's recommendation for payment of the net award amounts through the Department of Justice Attaché in Manila, Philippines.

WHEREFORE, PREMISES CONSIDERED, Movants request relief as stated in this Motion, including such other and further relief as they may show themselves entitled.

Respectfully submitted,

/s/ Les Cassidy

Les Cassidy  
Attorney in Charge for Detained Crewmembers  
Texas Bar No. 03979270  
Federal Id No. 5931  
814 Leopard St  
Corpus Christi, TX 78401  
Phone: 361-887-2965  
Facsimile: 361-885-0320  
Email: les.cassidy@gmail.com

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 13<sup>th</sup>, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the Defendant and the Government.

Respectfully submitted,

/s/ Les Cassidy

Les Cassidy  
Attorney in Charge for Detained Crewmembers