

RUDY GIULIANI BUSINESS TIES RESEARCH DOSSIER

CONTENTS

ALREADY IN-DEPTH REPORTED FOREIGN TIES	1
OTHER FOREIGN ENTANGLEMENTS.....	1
GIULIANI PAID SPEECHES	5
OTHER CONTROVERSIAL CORPORATE ENTANGLEMENTS.....	10
BRACEWELL GIULIANI.....	18
ANDERSON KILL OLICK & OSHINSKY.....	21

ALREADY IN-DEPTH REPORTED FOREIGN TIES

In 2011 Giuliani Was Paid For A Speech By An Exiled Iranian Political Party Called The Mujahedin E-Khalq, Known As The MEK, Calling On State To Remove It From Its List Of Terror Organizations. “In 2011, an exiled Iranian political party called the Mujahedin e-Khalq, known as the MEK, paid Giuliani to give a speech in Washington calling on the State Department to remove the group from its list of terrorist organizations. The MEK recruited a host of other formal officials to its cause and succeeded in reversing the terrorist designation in 2012.” (Isaac Arnsdorf, “Giuliani Took Money From Qatar, Venezuela, Iranian Exiles,” [Politico](#), 11/15/16)

Giuliani Provided “Security Advice” For The Government Of Qatar. “Looking to staff up his administration, the president-elect is reportedly leaning toward nominating former New York City Mayor Rudy Giuliani as his next secretary of state. Giuliani’s ties to Qatar would be among a host of potential conflicts of interest that would come into play should that nomination take place. ... But the The Wall Street Journal reported in 2007 that one of those clients was the government of Qatar, to which Giuliani provided ‘security advice.’” (Sam Stein, Paul Blumenthal And Jason Cherkis, “Rudy Giuliani s Conflicts Of Interest Would Place Donald Trump In A Bind,” [The Huffington Post](#) 11/15/16)

Giuliani’s Firm Lobbied For Citgo. “The Houston-based law firm Giuliani joined as a named partner in 2005 lobbied in Texas for Citgo, the U.S. subsidiary of the Venezuelan state oil company then controlled by President Hugo Chavez, The New York Times reported in 2007.” (Isaac Arnsdorf, “Giuliani Took Money From Qatar, Venezuela, Iranian Exiles,” [Politico](#), 11/15/16)

OTHER FOREIGN ENTANGLEMENTS

Giuliani Has Ties To A Firm With Deep Russian And Putin Ties

Giuliani Has Ties To TriGlobal Strategic Ventures, A Company “That Has Provided Image Consulting To Russian Oligarchs And Clients With Deep Kremlin Ties.” “TriGlobal Strategic Ventures, a company that aims to ‘assist Western clients in furthering their business interests in the emerging economies of the former Soviet Union,’ according to its website, is among the more obscure clients. Records show Mr. Giuliani has had ties dating to at least 2004 to TriGlobal, a company that has provided image consulting to Russian oligarchs and clients with deep Kremlin ties.” (Mark Landler, Eric Lipton And Jo Becker, “Rudolph Giuliani s Business Ties Viewed As Red Flag For Secretary Of State Job,” [The New York Times](#), 11/15/16)

Clients Of TriGlobal Include Transneft, Russia’s State-Owned Oil Pipeline Company, “Which Is The Target Of Western Sanctions.” “Records show Mr. Giuliani has had ties dating to at least 2004 to TriGlobal, a company that has provided image consulting to Russian oligarchs and clients with deep Kremlin ties. They have included Transneft, Russia’s state-owned oil pipeline giant, which is the target of Western sanctions imposed after President Vladimir V. Putin annexed Crimea and began meddling in Ukraine.” (Mark Landler, Eric Lipton And Jo Becker, “Rudolph Giuliani’s Business Ties Viewed As Red Flag For Secretary Of State Job,” [The New York Times](#) 11/15/16)

Giuliani’s Work For TriGlobal Includes Setting Up Meetings With Prominent Russian Politicians And Top Russian Business Leaders. “Records show Mr. Giuliani has had ties dating to at least 2004 to TriGlobal, a company that has provided image consulting to Russian oligarchs and clients with deep Kremlin ties. ... In 2004, for instance, the company arranged to have Mr. Giuliani come to Moscow to meet with the foreign minister, Sergey V. Lavrov, as well as other prominent Russian politicians and business executives. That year, Mr. Giuliani visited Magnitogorsk, Russia, ‘for a series of meetings with Viktor Rashnikov,’ a Russian billionaire who is the chairman of the Magnitogorsk Iron and Steel Works. While Mr. Trump has vowed to bring back jobs in the United States steel industry, Russia has complained about American tariffs on steel that hurt companies like Mr. Rashnikov’s. TriGlobal also arranged for Mr. Giuliani to meet with executives from the Russian steel company in the next year in New York, where they dined at the St. Regis hotel at an event attended by Bill Clinton.” (Mark Landler, Eric Lipton And Jo Becker, “Rudolph Giuliani’s Business Ties Viewed As Red Flag For Secretary Of State Job,” [The New York Times](#), 11/15/16)

Clients Of Giuliani Include The Government Of Mexico And TransCanada

Giuliani Promotes The Fact He Has Foreign Consulting Contracts, Including Ones With The Government Of Mexico And TransCanada, Of Keystone XL Fame. “Since almost the minute he left office, Giuliani has been using the global fame he acquired on 9/11 and its aftermath to rake in millions of dollars from consulting with ‘corporations, individuals, and governments’ (as his website describes his client base) on security matters, financial audits and crisis management. ... Other prominent clients include TransCanada, the developer of the controversial Keystone XL Pipeline Project (which Obama opposes, further damaging Rudy’s economic interests); Purdue Pharma, which manufactures Oxycontin, once Rush Limbaugh’s drug of choice; Nextel, the wireless services company now owned by Sprint; Shell Oil; and the Government of Mexico.” (Tim Shorrock, “Giuliani’s Love For His Country Is Equal To The Money He Makes,” [The Nation](#) 2/25/15)

In 2015 It Was Reported That Giuliani Was Hired By “El Salvador’s Business Community” To “Advise The Salvadoran Government On How To Curb Soaring Crime.” “On Dec. 2, El Salvador’s business community announced it had hired former New York City Mayor Rudy Giuliani to advise the Salvadoran government on how to curb soaring crime driven by lawless gangs and rampant corruption.” (Laura C. Mallonee, “Rudy Giuliani Will Advise El Salvador On Security, Justice Reform,” [Latin America News Dispatch](#) 1/12/15)

In 2014 Giuliani Gave A Speech In Guatemala City At A Forum Organized By The Guatemalan Development Foundation. “Former New York City Mayor Rudy Giuliani recently visited Guatemala City to speak at a forum organized by the Guatemalan Development Foundation.” (Mike Allison, “The Savior Rudy Giuliani Goes To Guatemala City,” [CentralAmericanPolitics.Blogspot.com](#) 10/9/14)

- **Giuliani Was Also Hired To Advise On Crime In The Country.** “Guatemala’s business sector also hired Giuliani to advise on crime earlier in 2014.” (Laura C. Mallonee, “Rudy Giuliani Will Advise El Salvador On Security, Justice Reform,” [Latin America News Dispatch](#), 1/12/15)

- **The Group Has Been Described As A “Conservative Business Association.”** “In an address last year to a conservative business association in Guatemala about crime, for example, [Giuliani] warned that ‘you are not going to solve it with schools, libraries, nice neighborhoods and sports teams. You have to emphasize law enforcement.’” (Tim Shorrock, “Giuliani’s Love For His Country Is Equal To The Money He Makes,” [The Nation](#), 2/25/15)

Giuliani Advised The Brazilian Government On Crime In Advance Of The 2016 Rio Olympics. “Giuliani is similarly advising the Brazilian government on security for the 2016 Olympic Games in Rio de Janeiro, although the games’ Security Director Luiz Fernando Corrêa has expressed some skepticism.” (Laura C. Mallonee, “Rudy Giuliani Will Advise El Salvador On Security, Justice Reform,” [Latin America News Dispatch](#) 1/12/15)

Giuliani Advised The Colombian Government On Crime Issues. “Within the last few years, though, Colombia has seen a crime uptick, prompting officials to consult with Giuliani. ‘I just got back from Colombia,’ he said on CBS This Morning last May. ‘I advise the Colombian government how to get crime down. Crime is down 23 percent in Bogota. I am very proud of that.’” (Laura C. Mallonee, “Rudy Giuliani Will Advise El Salvador On Security, Justice Reform,” [Latin America News Dispatch](#) 1/12/15)

Giuliani Consulted For The Government Of Honduras. “[Giuliani is] a consultant in Mexico, El Salvador, Honduras and Guatemala, the very countries where right-wing governments, traffickers and/or gangs are driving children and teenagers across the U.S. border.” (Wayne Barrett, “What Rudy Giuliani Knows About Love – A Response To His ‘Doesn’t Love America’ Critique Of Obama,” [New York Daily News](#), 2/20/15)

Giuliani Advised Chile On Crime And Helped Political Candidates In The Dominican Republic. “Other work was through another company of his, Giuliani Security. Those contracts include work combating crime in Mexico City, El Salvador, Colombia, Chile, along with helping political candidates in Ukraine and the Dominican Republic.” (Drew Griffin, Nelli Black And Theodore Schleifer, “Giuliani Legal Work Could Complicate Path To State Department,” [CNN](#), 11/15/16)

In 2011 Giuliani Went To Peru To Campaign For The Daughter Of Former President Alberto Fujimori, Who Is Serving Time For Human Rights Abuses. “In 2011, he went to Peru to campaign for rightist Keiko Fujimori, the daughter of the disgraced former president Alberto Fujimori, who is still serving a twenty-five-year sentence for human rights abuses.” (Tim Shorrock, “Giuliani’s Love For His Country Is Equal To The Money He Makes,” [The Nation](#), 2/25/15)

In 2008 Giuliani Advised Boxer Vitali Klitschko In His Race For Mayor Of Kiev, Ukraine. “Who would have guessed that the next chapter in Rudolph W. Giuliani’s life would involve political consulting for a local election in Eastern Europe? Mr. Giuliani, the former mayor and former presidential candidate, called a news conference this morning in Times Square to appear beside Vitali Klitschko, a former boxing and kickboxing champion who is running for mayor of Kiev, the capital of Ukraine.” (Sewell Chan, “Giuliani Weighs In On Race For Mayor (In Ukraine),” [The New York Times](#) 5/7/08)

The Mexico City Debacle

In Oct. 2002, Giuliani Partners Signed Contract To Help Reduce Crime In Mexico City, Refused To Disclose Costs

Giuliani, Along With Bernard Kerik, Signed Contract To Advise Mexico City On Reducing Epidemic Of Crime. “Former Mayor Rudolph W. Giuliani announced yesterday that his consulting firm had signed a contract to advise Mexico City’s police officials on crime-reduction techniques to deal with an epidemic of kidnappings, murders and robberies. Mr. Giuliani, who formed his consulting firm, the Giuliani Group, after leaving office, said he would draw on his experience tackling crime in New York City to help the residents of Mexico’s sprawling capital.

Mr. Giuliani said he and his former police commissioner, Bernard B. Kerik, would meet with officials in Mexico City next month.” (Lydia Polgreen, “Giuliani Firm Gets Contract To Advise Mexico City Police,” *The New York Times*, 10/11/02)

- **Giuliani Said He Would Bring “Broken Windows” To Mexico City.** “Mr. Giuliani said he would recommend the same methods that, he said, sent New York City's crime rates plunging, including the ‘broken windows’ approach of focusing on seemingly minor crimes as a way to discourage lawlessness and the use of crime statistics and mapping to pinpoint problem areas.” (Lydia Polgreen, “Giuliani Firm Gets Contract To Advise Mexico City Police,” *The New York Times*, 10/11/02)

Giuliani Would Not Disclose Amount Or Source Of Contract. “The contract, the first international consulting deal for Mr. Giuliani's firm, is being paid for by a group of businessmen in Mexico City; municipal officials refused to name them. They also declined to say how much the Giuliani Group would be paid.” (Lydia Polgreen, “Giuliani Firm Gets Contract To Advise Mexico City Police,” *The New York Times*, 10/11/02)

- **“Prominent Mexican Business Interests Have Hired His Consulting Firm, Giuliani Partners, For A Cool \$4.3 Million To Teach Mexico What Real Crime-Fighting Is All About.”** (Shelley Emling, “Can Giuliani Export Crime Fighting Success?” *Austin American Statesman*, 11/6/02)
- **Billionaire Businessman Carlos Slim Allegedly Paying Partial Cost Of Giuliani Consulting.** “Officials in Mexico City said privately, however, that a billionaire businessman, Carlos Slim, would most likely pay some of the costs for Mr. Giuliani's services. Mr. Slim has been working with Mexico City's mayor, Andres Manuel Lopez Obrador, to bring order to the city. Mr. Slim has said that he would form a foundation to spend \$100 million to help clean up its congested center.” (Lydia Polgreen, “Giuliani Firm Gets Contract To Advise Mexico City Police,” *The New York Times*, 10/11/02)

Giuliani Efforts Failed As Homicide Did Not Go Down And Kidnapping Increased

Giuliani Contract Ended With 146 Recommendations On How To Clean Up Mexico City.

“The working relationship effectively ended in August of 2003, after the Mexico City police department decided, without permission from New York, to translate into Spanish and release 146 recommendations based on Giuliani Partners consulting.” (Daniela Gerson, “In Mexico City, Few Cheers For Giuliani,” *The New York Sun*, 4/11/05)

Giuliani's Efforts Failed To Clean Up Mexico City, Saw Homicide Drop Less Than 1% And Kidnapping With Extortion On The Rise.

“Two years later, the cheering has stopped. In January 2005, Mexico City's new police chief, Joel Ortega, told local reporters, ‘I am no fan of Giuliani.’ Far from the 67% drop in homicides achieved during Mr. Giuliani's mayoralty in New York, which was touted in a Giuliani Partners press release announcing its Mexico City contract, the homicide rate in Mexico's capital slipped less than 1% in 2004. Kidnappings in which the victim is driven from ATM to ATM to withdraw money are on the rise, with some security firms saying Mexico is now rivaling Colombia as kidnapping capital of the world.” (Daniela Gerson, “In Mexico City, Few Cheers For Giuliani,” *The New York Sun*, 4/11/05)

Mexicans Were Unhappy With The Contract With Giuliani

Giuliani Not Offered Follow Up Contract To Implement Recommendations, Mexicans

“Sharply Critical” Of Effort. “The Giuliani team ended up being paid less than the \$4.3 million that was widely reported as the price for the work, and it was not hired for a follow-up project to implement its recommendations. In interviews with the Sun, several former Mexican police

officials and current officers were sharply critical of the Giuliani effort ..." (Daniela Gerson, "In Mexico City, Few Cheers For Giuliani," *The New York Sun*, 4/11/05)

- **Monica Rojas, Deputy Director Of The Statistics Department MCPD:** "We weren't necessarily in the same symphony ... Each side had a different interest ... The ideas and the concepts they conveyed to us, but they never explained how to achieve them." (Daniela Gerson, "In Mexico City, Few Cheers For Giuliani," *The New York Sun*, 4/11/05)
- **Antonio Rendon, MCPD Official Who Worked With Giuliani:** "They were not prepared, not at all ... They weren't consultants, they were retired policemen. And they were trying to organize another police force, but not with a methodology or a clear idea." (Daniela Gerson, "In Mexico City, Few Cheers For Giuliani," *The New York Sun*, 4/11/05)
- **Nicocio Acosto Leon, MCPD Officer:** "The Giuliani plan did not have any effect. It was money in the trash, really ... Better to buy arms, uniforms, to fix our vehicles because we have to do that ourselves." (Daniela Gerson, "In Mexico City, Few Cheers For Giuliani," *The New York Sun*, 4/11/05)

In 2006 Giuliani Worked On Behalf Of A Spanish Bank Looking To Buy Part Of An American Bank

In 2006 Giuliani Worked On Behalf Of Banco Santander, A Spanish Bank, When They Were "Attempting To Buy About 20 Percent Of Sovereign Bancorp Of Philadelphia." "Giuliani typically has not advertised his involvement in Bracewell & Giuliani cases. An exception was his work in February 2006 on behalf of a Spanish bank, Banco Santander, for what the law firm termed an 'independent review' of Santander's compliance with state and federal regulations in attempting to buy about 20 percent of Sovereign Bancorp of Philadelphia." (Andrew Zajac, "Giuliani Speaking Fees Draw Scrutiny," [Chicago Tribune](#) 2/7/07)

Santander's Investment Was Opposed By A Group Of Sovereign Investors, But Supported By Jay Sidhu, The CEO Of Sovereign. "The investment was bitterly opposed by a group of Sovereign shareholders but welcomed by Sovereign CEO Jay Sidhu, who wanted to use the infusion of money from Santander to buy another bank." (Andrew Zajac, "Giuliani Speaking Fees Draw Scrutiny," [Chicago Tribune](#), 2/7/07)

NOTE: Santander Had Donated To Hugo Chavez's Campaigns And Has Connections To Iran And Cuba. "As a result, says this source, Bracewell ignored dubious dealings by Santander, such as its donations to Venezuelan president Hugo Chávez's political campaigns and its connections to Cuba and Iran (Santander was fined by the U.S. in 2004 for doing business with Cuba and has come under scrutiny for trading with an Iranian bank blacklisted by the U.S. for links to terrorism), not to mention the fact that its C.E.O. had been investigated for corruption. 'I questioned why Rudy stuck his neck out like that,' the insider says. 'Obviously it was for a fee, but with his long-term aspirations there didn't seem like a lot of upside.' (Bracewell says that the firm was hired by Santander to assess the proposed investment and found that the bank 'had fully and completely complied with all laws relevant to the transaction.')" (Michael Shnayerson, "Risky Business A Tale Of Two Giulianis," *Vanity Fair*, 1/08)

NOTE: In November 2006 Giuliani "Delivered A Speech At The Jay S. Sidhu School Of Business And Leadership At Wilkes University In Wilkes Barre, Pa." "Sovereign CEO Sidhu, meanwhile, resigned under pressure in October, taking with him a \$43 million golden parachute. The next month, Giuliani delivered a speech at the Jay S. Sidhu School of Business and Leadership at Wilkes University in Wilkes Barre, Pa." (Andrew Zajac, "Giuliani Speaking Fees Draw Scrutiny," [Chicago Tribune](#), 2/7/07)

GIULIANI PAID SPEECHES

Giuliani Made Over \$11 Million For Paid Speeches In The Year Before Running For President And An Additional \$8 Million In 2002

Giuliani Made “More Than \$11 Million” Giving Paid Speeches In The “13 Months Directly Prior To Kicking Off His Republican Presidential Campaign In February 2007.” “In the 13 months directly prior to kicking off his Republican presidential campaign in February 2007, Rudy Giuliani earned more than \$11 million giving paid speeches.” (Eric Boehlert, “When GOP Hopeful Rudy Giuliani Earned \$11 Million in Speaking Fees And D.C. Press Didn’t Care,” [The Huffington Post](#), 7/22/14)

Giuliani Made Between \$100,000 And \$300,000 Per Speech And Spoke 120 Times. “The former New York City mayor, who was thrust into the national and international spotlight after the terror attacks of September 11, 2001, typically charged between \$100,000 and \$300,000 for his speeches and spoke more than 120 times.” (Eric Boehlert, “When GOP Hopeful Rudy Giuliani Earned \$11 Million in Speaking Fees And D.C. Press Didn’t Care,” [The Huffington Post](#), 7/22/14)

Giuliani Made \$8 Million Giving Speeches In 2002. “Note that along with the \$11 million in speaking fees Giuliani pocketed in 2006, he also earned \$8 million on the speech circuit in 2002.” (Eric Boehlert, “When GOP Hopeful Rudy Giuliani Earned \$11 Million in Speaking Fees And D.C. Press Didn’t Care,” [The Huffington Post](#), 7/22/14)

Paid Speeches (November 2005-February 2007; June 2008)

NOTE: Green Denotes Wall Street/Financial; Yellow Denotes Possible Foreign; Red Denotes Both

Date	Organization	Gross Fee (1)	Net Speaker Fee
11/20/2005	Sage Capital Group (3)	\$300,000.00	\$270,000.00
12/6/2005	Cambridge Strategic Management Group	\$50,000.00	\$40,000.00
1/20/2006	IDX Systems Corp.	\$100,00.00	\$80,000.00
1/22/2006	Guidant Sales Corp.	\$100,000.00	\$80,000.00
1/24/2006	IQPC	\$100,000.00	\$80,000.00
1/25/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,00.00	\$80,000.00
1/25/2006	Life Win, Inc. (Get Motivated Seminars)	\$25,000.00	\$20,000.00
1/31/2006	Freescale Semiconductor, Inc.	\$100,000.00	\$80,000.00
2/2/2006	TD Waterhouse Investor Services, Inc.	\$100,000.00	\$80,000.00
2/6/2006	Novartis Pharmaceuticals Corp.	\$60,000.00	\$48,000.00
2/7/2006	National Grocers Association	\$100,000.00	\$80,000.00
2/8/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
2/8/2006	Life Win, Inc. (Get Motivated Seminars)	\$25,000.00	\$20,000.00
2/11/2006	Edwards Lifesciences	\$100,000.00	\$80,000.00
2/16/2006	Lexus Southern Area Dealers	\$50,000.00	\$40,000.00
2/22/2006	Sir Dorabji Tata Trust	\$200,000.00	\$180,000.00
2/27/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
3/5/2006	Reed Exhibitions	\$50,000.00	\$40,000.00
3/7/2006	Shell Oil Products US	\$60,000.00	\$48,000.00
3/8/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
3/9/2006	P4 Healthcare	\$100,000.00	\$80,000.00

3/13/2006	Softbrain Corporation	\$100,000.00	\$90,000.00
3/16/2006	TraceyLocke	\$50,000.00	\$40,000.00
3/21/2006	Help-U-Sell Real Estate	\$100,000.00	\$80,000.00
3/24/2006	Oklahoma State University	\$100,000.00	\$80,000.00
3/28/2006	Dunkin' Brands Inc. (Dunkin Donuts)	\$100,000.00	\$80,000.00
3/29/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
3/30/2006	Barrick Gold Corp. c/o Ogilvy Renault	\$50,000.00	\$40,000.00
3/31/2006	Credit Suisse	\$100,000.00	\$80,000.00
4/5/2006	Los Angeles Venture Association	\$100,000.00	\$80,000.00
4/11/2006	Financial Times Ltd.	\$200,000.00	\$160,000.00
4/19/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
4/21/2006	University Of Western Ontario	\$120,000.00	\$100,000.00
4/24/2006	Nelson Levine deLuca & Horst	\$50,000.00	\$40,000.00
4/24/2006	PGA Tour, Inc. (2)	\$90,000.00	\$72,000.00
5/1/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
5/2/2006	SAP America, Inc.	\$100,000.00	\$80,000.00
5/4/2006	City of Winnipeg	\$120,000.00	\$100,000.00
5/7/2006	Richmond Events Inc.	\$50,000.00	\$40,000.00
5/7/2006	Shore Memorial Health Foundation	\$60,000.00	\$48,000.00
5/9/2006	America's Health Insurance Plans	\$100,000.00	\$80,000.00
5/9/2006	Ohio Chamber of Commerce	\$100,000.00	\$80,000.00
5/10/2006	RedPrairie Corporation	\$100,000.00	\$80,000.00
5/11/2006	MAILCOM	\$60,000.00	\$48,000.00
5/12/2006	Project Mgt. Institute Mile Hi Chapter	\$100,000.00	\$80,000.00
5/13/2006	General Motors	\$100,000.00	\$80,000.00
5/16/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
5/18/2006	Atlanta Journal Constitution	\$100,000.00	\$80,000.00
5/19/2006	Gail & Rice, Inc.	\$100,000.00	\$80,000.00
5/21/2006	Stuffolk University	\$100,000.00	\$80,000.00
5/22/2006	Junior Achievement of Eastern MA, Inc.	\$100,000.00	\$80,000.00
5/23/2006	Merrill Lynch & Co., Inc	\$100,000.00	\$80,000.00
5/24/2006	American Jewish Committee	\$50,000.00	\$40,000.00
5/25/2006	Advertising Speciality Institute	\$50,000.00	\$40,000.00
5/25/2006	Financial Pacific Insurance Company	\$100,000.00	\$80,000.00
5/31/2006	Saginaw County Chamber of Commerce	\$50,000.00	\$40,000.00
6/1/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
6/1/2006	Life Win, Inc. (Get Motivated Seminars)	\$25,000.00	\$20,000.00
6/1/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
6/1/2006	Life Win, Inc. (Get Motivated Seminars)	\$25,000.00	\$20,000.00
6/2/2006	Council of Insurance Agents and Brokers	\$100,000.00	\$80,000.00
6/2/2006	Council of Insurance Agents and Brokers	\$100,000.00	\$80,000.00

6/5/2006	Cloverlea Entertainment	\$100,000.00	\$80,000.00
6/5/2006	Cloverlea Entertainment	\$100,000.00	\$80,000.00
6/6/2006	Cendant Corporation	\$100,000.00	\$80,000.00
6/6/2006	Cendant Corporation	\$100,000.00	\$80,000.00
6/7/2006	HSM Americas, Inc.	\$100,000.00	\$80,000.00
6/7/2006	HSM Americas, Inc.	\$5,000.00	\$4,000.00
6/7/2006	HSM Americas, Inc.	\$100,000.00	\$80,000.00
6/7/2006	HSM Americas, Inc.	\$5,000.00	\$4,000.00
6/9/2006	America's Health Insurance Plans	\$100,000.00	\$80,000.00
6/14/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
6/14/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
6/21/2006	Global Leaders Ltd.	\$200,000.00	\$160,000.00
6/21/2006	Global Leaders Ltd.	\$200,000.00	\$160,000.00
6/27/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
6/27/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
6/28/2006	Bowling Proprietors Association of America	\$100,000.00	\$80,000.00
7/7/2006	Assurant Health	\$50,000.00	\$40,000.00
7/7/2006	Assurant Health	\$50,000.00	\$40,000.00
7/21/2006	Merrill Lynch & Co., Inc.	\$100,000.00	\$80,000.00
7/21/2006	Merrill Lynch & Co., Inc.	\$100,000.00	\$80,000.00
7/25/2006	Association E3 Futura	\$150,000.00	\$120,000.00
7/25/2006	Association E3 Futura	\$150,000.00	\$120,000.00
8/5/2006	Amerprise Financial	\$100,000.00	\$80,000.00
8/5/2006	Amerprise Financial	\$100,000.00	\$80,000.00
8/5/2006	Sports Etcetera	\$100,000.00	\$80,000.00
8/5/2006	Sports Etcetera	\$100,000.00	\$80,000.00
8/16/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
8/16/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
8/18/2006	Shaklee Corporation	\$100,000.00	\$80,000.00
8/18/2006	Shaklee Corporation	\$100,000.00	\$80,000.00
8/29/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
9/1/2006	Steiner Sports Marketing	\$75,000.00	\$60,000.00
9/5/2006	Life Win, Inc. (Get Motivated Seminars)	\$50,000.00	\$40,000.00
9/6/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
9/7/2006	Masterplan, Inc. Allegheny Casualty International Fidelity	\$55,000.00	\$44,000.00
9/9/2006	Associated Bond (A/A Holdings)	\$50,000.00	\$40,000.00
9/12/2006	HSM Americas, Inc.	\$10,000.00	\$8,000.00
9/12/2006	HSM Americas, Inc.	\$50,000.00	\$40,000.00
9/15/2006	Forval Corporation	\$150,000.00	\$135,000.00
9/19/2006	National Beer Wholesalers Association	\$100,000.00	\$80,000.00

9/20/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
9/20/2006	World Affairs Council of Philadelphia	\$100,000.00	\$80,000.00
9/22/2006	Assist America	\$50,000.00	\$40,000.00
9/23/2006	Empire Entertainment Inc.	\$50,000.00	\$40,000.00
9/29/2006	Iceland Telecom- Siminn	\$200,000.00	\$160,000.00
10/4/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
10/5/2006	International Sanitary Supply Association	\$100,000.00	\$80,000.00
10/9/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
10/16/2006	Institute for International Research Poland	\$200,000.00	\$160,000.00
10/23/2006	Healthways, Inc.	\$100,000.00	\$80,000.00
10/24/2006	HSM Deutschland GMBH	\$125,000.00	\$100,000.00
10/26/2006	HSM Italia, S.R.L UNIPERSONALE	\$125,000.00	\$100,000.00
10/31/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
11/8/2006	HSM Argentina S.A.,	\$10,000.00	\$8,000.00
11/8/2006	HSM Argentina S.A.,	\$125,000.00	\$100,000.00
11/11/2006	American Hotel & Lodging Assoc. & Educ. Institute	\$50,000.00	\$40,000.00
11/12/2006	Wilkes University	\$100,000.00	\$80,000.00
11/13/2006	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
11/14/2006	McCreath Communications	\$100,000.00	\$80,000.00
11/14/2006	McCreath Communications	\$100,000.00	\$80,000.00
11/17/2006	Hindustan Times Group	\$200,000.00	\$160,000.00
11/20/2006	LaSalle Bank Corporation	\$100,000.00	\$80,000.00
12/1/2006	JP Morgan Chase & Company	\$50,000.00	\$40,000.00
12/6/2006	Future Tech Enterprise, Inc.	\$50,000.00	\$40,000.00
12/12/2006	Forval Corporation	\$200,000.00	\$180,000.00
1/9/2007	Commercial Mortgage Securities Association	\$100,000.00	\$80,000.00
1/10/2007	Needham and Company	\$50,000.00	\$40,000.00
1/22/2007	JP Morgan Securities Inc.	\$100,000.00	\$80,000.00
1/22/2007	Ringling School Library Association Town Hall	\$150,000.00	\$120,000.00
1/24/2007	Premier, Inc.	\$100,000.00	\$80,000.00
1/25/2007	Lehman Brothers	\$100,000.00	\$80,000.00
1/25/2007	Life Win, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
1/26/2007	Quesada Armed Forces Communications and Electronics	\$50,000.00	\$40,000.00
1/31/2007	Association	\$100,000.00	\$80,000.00
2/3/2007	Leadership 100	\$90,000.00	\$72,000.00
2/8/2007	Association of Foreign Investors In Real Estate	\$50,000.00	\$40,000.00
2/9/2007	Quesada	\$50,000.00	\$40,000.00
2/14/2007	LifeWin, Inc. (Get Motivated Seminars)	\$100,000.00	\$80,000.00
2/14/2007	LifeWin, Inc. (Get Motivated Seminars)	\$25,000.00	\$20,000.00

6/28/2008	Bowling Proprietors Association of America	\$100,000.00	\$80,000.00
-----------	--	--------------	-------------

Giuliani Was Known For Traveling In Style To His Paid Speaking Engagements

In A Speech To Oklahoma State University In 2006, Giuliani Requested Travel On A “Private Gulfstream Jet That Cost The School \$47,000 To Operate.” “In one speech last year at Oklahoma State University, Giuliani requested and received travel on a private Gulfstream jet that cost the school \$47,000 to operate.” (Andrew Zajac, “Giuliani Speaking Fees Draw Scrutiny,” [Chicago Tribune](#) 2/7/07)

- **“His Visit Essentially Wiped Out The Student Speakers Annual Fund.”** (Andrew Zajac, “Giuliani Speaking Fees Draw Scrutiny,” [Chicago Tribune](#) 2/7/07)

Giuliani’s Speaking Contract “Calls For Up To Five Hotel Rooms For His Entourage, Including His Own Two-Bedroom Suite With A Preferred Balcony View And King-Size Bed.” “Like other high-priced speakers in the private sector, Giuliani routinely travels in style. Besides the Gulfstream, which is a standard perk on the big-time speakers circuit, his contract calls for up to five hotel rooms for his entourage, including his own two-bedroom suite with a preferred balcony view and king-size bed, in the event of an overnight stay.” (Andrew Zajac, “Giuliani Speaking Fees Draw Scrutiny,” [Chicago Tribune](#) 2/7/07)

OTHER CONTROVERSIAL CORPORATE ENTANGLEMENTS

A Review In 2007 By The Associated Press Was Able To Identify 175 Clients Of Giuliani’s Houston Law Firm, Bracewell & Giuliani, Which Included Saudi Arabia. “If Giuliani were elected, his administration would be on the receiving end of regulatory requests, contract bids and policy proposals by the same clients of his Houston firm, Bracewell & Giuliani, that have contributed toward his personal net worth of millions of dollars. Although the Republican has so far declined to identify all the companies with which Bracewell and his other firms have done business over the past five years, The Associated Press identified more than 175 as part of an expansive review of lobbying records, court filings and securities reports. Giuliani, like other candidates, was expected to detail his financial wealth Tuesday in a report to the Federal Election Commission. Giuliani's law and lobbying clients have included Saudi Arabia, Rupert Murdoch's News Corp., and chewing tobacco maker UST Inc.” (Sharon Theimer and Delvin Barrett, “Giuliani s Clients Could Pose Conflict,” [The Associated Press](#) 5/15/07)

In 2007, Bracewell & Giuliani Filed Papers On Behalf Of Saudi Arabia In A Texas Court Case Against Citgo. “It also is working for Saudi Arabia. In March, the firm filed papers in a Texas court case on behalf of Saudi Arabia's oil ministry taking sides with another international energy giant, Citgo, which is controlled by Venezuelan President Hugo Chavez, a rival of the Bush administration.” (Sharon Theimer and Delvin Barrett, “Giuliani s Clients Could Pose Conflict,” [The Associated Press](#) 5/15/07)

Other Bracewell & Giuliani Clients Include BMB Munai, Which Develops Oil Wells In Kazakhstan, And Statoil, The Norway-Based Oil And Gas Conglomerate “Other Bracewell & Giuliani legal clients include ChevronTexaco; government nuclear lab contractor Bechtel; BMB Munai, which develops oil wells in Kazakhstan; the Norway-based Statoil oil and gas conglomerate; the Luby's restaurant chain; online retailer Overstock.com; some of the bank lenders in the Adelpia Communications bankruptcy case; El Pollo Loco chicken restaurants; and even a country club River Oaks in Houston that is owed money by a bankrupt company.” (Sharon Theimer and Delvin Barrett, “Giuliani s Clients Could Pose Conflict,” [The Associated Press](#), 5/15/07)

A Company Owned By Giuliani, Giuliani Security & Safety, Provided Advice To A Gambling Project Partnership In Singapore That Included A Tycoon With Ties To The North Korean

Regime. “The same subsidiary, Giuliani Security & Safety, provided security advice to a Singapore gambling project on behalf of a partnership that included a tycoon close to the North Korean regime who is considered an organized crime figure by the U.S., according to a report in the Chicago Tribune.” (Isaac Arnsdorf, “Giuliani Took Money From Qatar, Venezuela, Iranian Exiles,” [Politico](#) 11/15/16)

- **According To Giuliani, The Individual Was Only A One Percent Owner And Had No Involvement With His Firm.** “About the Hong Kong family with ties to the North Korean leader, Giuliani said, ‘I think the person involved, if it’s correct, was a 1 percent owner that had no involvement with us, we never worked for, had nothing to do with.’” (Matthew Mosk, “Giuliani Defends Continued Ties To Consulting Firm,” [The Washington Post](#) 12/10/07)

Giuliani Partners Was Hired By Purdue Pharma, The Maker Of Oxycontin, Which Has Pled Guilty To Misleading The Public About The Risk Of Addiction To Oxycontin. “Giuliani Partners was hired in 2002 by Purdue Pharma to help it combat smuggling and abuse of its prescription painkiller OxyContin, which was blamed for causing or contributing to hundreds of deaths nationwide. On Thursday, Purdue and three current and former executives pleaded guilty to misleading the public about the risk of addiction to the drug; they face \$634 million in fines.” (Sharon Theimer and Delvin Barrett, “Giuliani’s Clients Could Pose Conflict,” [The Associated Press](#), 5/15/07)

Giuliani Capital Advisors Has Also Represented Naturex Inc., A French Food Flavoring Firm, Which Was Sued In Federal Court By The U.S. Attorney In New York For Violating The Controlled Substances Act. “Case in point: Naturex Inc, a French food-flavoring firm that hired Giuliani Capital Advisors to help with its 2005 acquisition of another company. A year later, Naturex was sued in federal court by the U.S. attorney in New York - the same job Giuliani once held - for violating the Controlled Substances Act.” (Sharon Theimer and Delvin Barrett, “Giuliani’s Clients Could Pose Conflict,” [The Associated Press](#) 5/15/07)

Giuliani Partners Has Represented “A Confessed Drug Smuggler Looking To Ensure That His Security Company Could Do Business With The Federal Government And The Horse-Racing Industry, Which Was Eager To Regain Public Confidence After A Betting Scandal.” “Giuliani Partners has represented a pharmaceutical company mired in a lengthy investigation, a confessed drug smuggler looking to ensure that his security company could do business with the federal government and the horse-racing industry, which was eager to regain public confidence after a betting scandal.” (Matthew Mosk, “Giuliani Defends Continued Ties To Consulting Firm,” [The Washington Post](#), 12/10/07)

NOTE: When He Ran For The Presidency In 2007, Giuliani Refused To Disclose All Of His Clients Citing Confidentiality Agreements His Firm Agreed To. “There has been considerable media attention given to Giuliani’s private business associations. For the past year, though, Giuliani has declined to identify his clients on the grounds that they entered into confidentiality agreements with his firm.” (Matthew Mosk, “Giuliani Defends Continued Ties To Consulting Firm,” [The Washington Post](#), 12/10/07)

NOTE: “Giuliani Never Personally Registered As A Lobbyist.” (Isaac Arnsdorf, “Giuliani Took Money From Qatar, Venezuela, Iranian Exiles,” [Politico](#) 11/15/16)

Giuliani Represented Clients “He Might Have Pursued As A Prosecutor”

Giuliani Represented Clients “He Might Have Pursued As A Prosecutor.” “Before he was New York mayor, Giuliani was a U.S. attorney who built his reputation by busting junk bond kingpins Ivan Boesky and Michael Milken. But as a private businessman, Giuliani has worked for firms that critics say he might have pursued as a prosecutor.” (Andrew Zajac, “Giuliani Speaking Fees Draw Scrutiny,” [Chicago Tribune](#), 2/7/07)

- **“Giuliani Also Has Collected More Than \$1 Million In Consulting Fees From Firms Tied To Criminal Or Regulatory Missteps.”** (Andrew Zajac, “Giuliani Speaking Fees Draw Scrutiny,” *Chicago Tribune*, 2/7/07)

“[G]iuliani Partners’ Clients, Which Have Included Companies Embroiled In Accounting Scandals [Could Be Used Against Mr. Giuliani In A Heated Political Campaign].” (Russ Buettner, “Giuliani Is Expected To Sell One Of His Three Businesses,” *The New York Times*, 1/24/07)

“[H]is Firm Hasn’t Been Shy About Taking On Politically Unpopular Clients, Including The Owner Of the Indian Point Nuclear Power Plant In Westchester And The Pharmaceutical Industry.” (Ben Smith, “Really Rich Rudy,” *New York Observer*, 4/4/05)

“The Client List Often Reads Like The List Of Witnesses Before Congressional Committees In Some Of The Highest-Profile Corporate Crises Of The Last Few Years ...” (Ben Smith, “Really Rich Rudy,” *New York Observer*, 4/4/05)

Giuliani Partners Worked With Merrill Lynch On Conflict Of Interest Charges

“[Giuliani] Was All Too Happy To Help Merrill Lynch ‘Negotiate’ With New York Attorney General Eliot Spitzer In 2002 When Merrill Was Under Investigation For Letting Investment-Banking Relationships Taint Its Stock Research.” (Michael Crowley, “Profit Sharing,” *The New Republic*, 9/6/04)

Giuliani Advised Merrill Lynch Amid Accusations Of Conflict Of Interest And Misleading Practices. “In one of his first private business ventures after leaving office, Giuliani in 2002 advised Merrill Lynch & Co. in settlement negotiations with then-New York Atty. Gen. Eliot Spitzer when Spitzer investigated accusations of conflicts of interest and misleading advice by the firm. Merrill Lynch wound up agreeing to pay a \$100 million fine and change some practices, but it did not admit wrongdoing.” (Andrew Zajac, “Giuliani Speaking Fees Draw Scrutiny,” *Chicago Tribune*, 2/7/07)

Giuliani Joined Applied DNA Sciences, Company “Backed By Investors With A History Of Securities-Related Charges”

Giuliani Advised Applied DNA Sciences Despite Being Run By Convicted Criminal. “In August 2004, Giuliani announced a consulting agreement between another of his firms, Giuliani Partners, and Applied DNA Sciences, which markets a technology that embeds genetic material from plants into consumer goods such as DVDs, clothing and pharmaceuticals to thwart counterfeiters. Applied DNA was backed at the time by Richard Langley Jr., who pleaded guilty to conspiracy to commit wire fraud in 1999. A year later, Langley was barred by the Securities and Exchange Commission from participating in penny stock offerings because of his involvement in an alleged stock scam.” (Andrew Zajac, “Giuliani Speaking Fees Draw Scrutiny,” *Chicago Tribune*, 2/7/07)

- **“Giuliani Partners Collected \$1.25 Million In Fees, According To An Applied DNA Filing With The SEC.”** (Andrew Zajac, “Giuliani Speaking Fees Draw Scrutiny,” *Chicago Tribune*, 2/7/07)

Giuliani Received \$2 Million, Ownership, For Advising Applied DNA Sciences. “Under a one-year agreement signed Aug. 6, Giuliani Partners will receive \$2 million in fees over 12 months to advise Applied on marketing strategies for security and homeland defense products. Giuliani’s firm also stands to receive 21 million applied shares, which would make it the largest shareholder of Applied. The shares were worth \$10 million when the agreement was signed.” (Edward Iwata, “Giuliani Firm s Deal To Advise Company Raises Questions,” *USA Today*, 3/18/05)

- **Applied Struggling Financially Before Giuliani Partners Came On Board.** “But Applied is suffering from \$35 million in losses from 2002 through 2004 and no revenue, according to

Securities and Exchange Commission filings. Shortly before Giuliani Partners signed on, applied had no cash for operations and no customers, according to an internal company document and an SEC filing.” (Edward Iwata, “Giuliani Firm s Deal To Advise Company Raises Questions,” *USA Today*, 3/18/05)

“Giuliani Partners ... Signed A Multimillion-Dollar Deal With [Applied DNA Sciences] A Struggling Los Angeles Business Backed By Investors With A History Of Securities-Related Charges, Regulatory Records Show.” (Edward Iwata, “Giuliani Firm s Deal To Advise Company Raises Questions,” *USA Today*, 3/18/05)

- **“Federal Authorities Charged [Co-Founder Richard Langley Jr.] In A 1996 Case Involving A Nationwide Kickback Scheme Of Stockbrokers And Stock Promoters. He Pleaded Guilty To Conspiracy To Commit Wire Fraud ...”** (Edward Iwata, “Giuliani Firm s Deal To Advise Company Raises Questions,” *USA Today*, 3/18/05)
- **“NASD Fined [Jeffrey] Salzwedel, One Of Applied’s Investor-Relations Officials, \$107,000 In 1998 For Allegedly Making “Unsuitable” Stock Recommendations For Customers While He Headed Salzwedel Financial.”** (Edward Iwata, “Giuliani Firm s Deal To Advise Company Raises Questions,” *USA Today*, 3/18/05)
- **“Vertical Capital Partners ... Helped Launch Applied In 2003 With A \$1.6 Million Loan. ... The NASD Fined Vertical, Firm President Ronald M. Heineman And An Employee A Total Of \$75,000 For Failing To Disclose The Nature Of SEC Sanctions Against A Company In Its Research Reports.”** (Edward Iwata, “Giuliani Firm s Deal To Advise Company Raises Questions,” *USA Today*, 3/18/05)

Giuliani Helped We The People, Do-It-Yourself Legal Group Sued By Many, Including DOJ, Fined \$286,000 By FTC

Giuliani Partners Advised Company Sued At Least 10 Times For Deceptive Practices, Forced To Pay \$286,000 FTC Fine. “Giuliani Partners also has advised We the People USA, of Santa Barbara, Calif., a seller of do-it-yourself kits for bankruptcies, divorces and other legal documents. Since late 2003, We the People has been sued by U.S. trustees at least 10 times for alleged deceptive practices and in December 2004 paid \$286,000 to settle Federal Trade Commission charges that it hid the lawsuits from potential franchisees.” (Andrew Zajac, “Giuliani Speaking Fees Draw Scrutiny,” *Chicago Tribune*, 2/7/07)

“Giuliani Threw In His Lot With A Questionable Chain, We The People USA, Which Sells Do-It-Yourself Services For Bankruptcy, Divorce, Wills And Trusts. ... The Tête-À-Tête Led To A 2003 Consulting Agreement And A Press Release.” (Nathan Vardi, “The Company He Keeps,” *Forbes*, 11/13/06)

- **“Those Navigating Skills Caught The Attention Of Deirdre Martini [A DOJ Official] ... In 2004 Martini Sued We The People For Engaging In Deceptive Conduct That Put Its Clients’ Homes At Risk.”** (Nathan Vardi, “The Company He Keeps,” *Forbes*, 11/13/06)
- **“The Company Settled The Case, Agreeing To Change Its Business Practices. That Didn’t End It. U.S. Bankruptcy Trustees, Affiliates Of The Department Of Justice, Have Filed At Least 13 Lawsuits Across The Nation Against We The People And Its Franchises For The Unauthorized Practice Of Law.”** (Nathan Vardi, “The Company He Keeps,” *Forbes*, 11/13/06)
- **“In Addition, The Chain Paid A \$286,000 Penalty To Settle Charges, Brought By The Federal Trade Commission, Of Selling Franchises Without Disclosing The U.S. Trustee Lawsuits.”** (Nathan Vardi, “The Company He Keeps,” *Forbes*, 11/13/06)

Giuliani Companies Failed To Disclose Work On Both Sides Of Case, Called "Potential Conflict Of Interest"

Giuliani Companies Represented Both Debtor And Creditor In Bankruptcy Case, "A Potential Conflict Of Interest That Wasn't Disclosed To The Federal Judge Overseeing The Case." "A pair of companies owned by Rudy Giuliani represented both a debtor and a creditor in a recently concluded bankruptcy proceeding, a potential conflict of interest that wasn't disclosed to the federal judge overseeing the case, records show. The matter could heighten pressures on Mr. Giuliani's presidential campaign to be more forthcoming about the candidate's stable of businesses, their clients and the services they provide. In September 2005, a subsidiary of closely held Giuliani Partners LLC signed a consulting agreement with Delta Air Lines Inc. to provide restructuring advice during the carrier's bankruptcy reorganization, drawing more than \$5 million in fees for the service. Then, in January 2006, a separate Giuliani Partners division Giuliani Security & Safety signed a \$2 million consulting deal with Command Security Corp., a tiny provider of security-guard services that had been left with \$1 million in unpaid bills when Delta and Northwest Airlines Corp. filed for bankruptcy-court protection in September 2005. As an adviser to Delta, one Giuliani Partners unit Giuliani Capital Advisors would be in a position to recommend that the airline give Command business and perhaps even suggest contract terms." (Christopher Cooper, "Giuliani Firms Had Potential Conflict Of Interest," *The Wall Street Journal*, 5/7/07)

- **Law Professor Lynn LoPucki Says Lack Of Disclosure Could Bring "Stiff" Penalties, No Way To Know If Giuliani Companies Acted Unethically.** "Lynn LoPucki, a law professor at the University of California at Los Angeles who specializes in bankruptcies, says there is no way of knowing whether Mr. Giuliani's company did anything unethical. 'That's the purpose of disclosure: to uncover conflicts of interest,' Mr. LoPucki said. 'We don't know the reason they didn't disclose and we don't know what they failed to disclose.' Failing to disclose relevant connections can lead to trouble. Bankruptcy judges can impose penalties on creditor advisers if the judge concludes a firm has improperly failed to reveal connections on both sides of the case, Mr. LoPucki said. Penalties can be stiff in the Southern District of New York, where the Delta case was handled. In 1994, a federal judge there fined law firm Weil Gotshal & Manges LLP \$800,000 for failing to disclose conflicts associated with the Leslie Fay Cos. bankruptcy, in which the firm served as an adviser to the debtor." (Christopher Cooper, "Giuliani Firms Had Potential Conflict Of Interest," *The Wall Street Journal*, 5/7/07)

Giuliani Partners And Giuliani Capital Advisors Required To Fill Out Form Disclosing Work On Both Sides Of Case, But "Never Disclosed To The Court" The Conflict Of Interest. "Under federal bankruptcy law, Giuliani Partners and Giuliani Capital Advisors were required to fill out a form stating any 'connections with Interested Parties' which would include work being performed simultaneously for a creditor and the debtor in the case. The company was required to file such an affidavit in court, and update it periodically as the Delta case unfolded. The company never disclosed to the court its security division's ties to Command Security." (Christopher Cooper, "Giuliani Firms Had Potential Conflict Of Interest," *The Wall Street Journal*, 5/7/07)

- **Giuliani Capital Advisors Filed Disclosure With 30 Separate Creditors – But Not Command Security.** "Mr. Giuliani's company entered the Delta case within days of the carrier's bankruptcy filing in 2005. Four months later, the firm signed a consulting agreement with Command Security. Two months after that, Mr. Giuliani's firm filed a standard disclosure in the Delta case. David S. Miller, a managing director of Giuliani Capital, disclosed relationships the parent firm had with 30 separate creditors in a sworn affidavit. Command Security wasn't one of them. In a subsequent filing, in October 2006, Mr. Miller again didn't

disclose the Command connection.” (Christopher Cooper, “Giuliani Firms Had Potential Conflict Of Interest,” *The Wall Street Journal*, 5/7/07)

Giuliani Security And Safety Paid \$2.1 Million For Command Security Work. “In relative terms, the consulting agreement with Mr. Giuliani came dear to Command Security. It paid Giuliani Security & Safety \$175,000 a month about \$2.1 million under the one-year contract. The contract boosted what Command called ‘administrative expenses’ by 30%. In its 2006 SEC filings, Command said the Giuliani contract would ‘have a negative impact on the company’s future results of operations.’” (Christopher Cooper, “Giuliani Firms Had Potential Conflict Of Interest,” *The Wall Street Journal*, 5/7/07)

“Friendship Also Dragged Giuliani Into Command Security, Another O-T-C Bulletin Board Stock, Which Rents Out Security Guards And Lost \$100,000 On \$85 Million Of Revenue ...” (Nathan Vardi, “The Company He Keeps,” *Forbes*, 11/13/06)

Giuliani Contributor Richard Chwatt Provided “Introduction” Between Giuliani And Command Security, Made \$470,000 For Role. “Mr. Giuliani’s firm wasn’t the only one that made money on the Command contract. The deal was assisted by Richard Chwatt, a contributor to Mr. Giuliani’s presidential campaign. According to Command’s SEC filings, Mr. Chwatt’s firm, Jericho State Capital Consulting LLC, provided the ‘introduction’ that led to the signing of Command’s contract with the Giuliani company. In February 2006, Command agreed to give Jericho \$90,000 cash and 350,000 stock options, which are currently valued at about \$380,000.” (Christopher Cooper, “Giuliani Firms Had Potential Conflict Of Interest,” *The Wall Street Journal*, 5/7/07)

- **Giuliani Brought On Board Through Richard Chwatt, Whose Wife Was Friends With Judith Nathan.** “To snag Giuliani, [Bruce Galloway, Command’s chairman and chief backer] turned to a business associate, Richard Chwatt, co-owner of Jericho State Capital in Boca Raton, Fla. ‘Richard Chwatt’s wife is very, very dear friends with Judith Nathan, and that’s how we got the relationship,’ says Galloway.” (Nathan Vardi, “The Company He Keeps,” *Forbes*, 11/13/06)

Giuliani Was Hired By Purdue Pharma To Consult On OxyContin Security While He Was Under Contract With The DEA To Combat It

“Purdue Pharma ... Announced That It Is Working With Giuliani Partners, LLC On Various Management Initiatives Including A Program To Combat Prescription Drug Abuse And Diversion.” (Giuliani Partners, “Purdue Pharma Engages Giuliani Partners As External Advisor,” Press Release, 5/28/02)

- **“[G]iuliani Partners, LLC Has Been Advising The Company On A Range Of Internal Issues Including Solutions Aimed At Preventing Prescription Drug Abuse While Protecting Patients’ Access To Needed Medicines.”** (Giuliani Partners, “Purdue Pharma Engages Giuliani Partners As External Advisor,” Press Release, 5/28/02)
- **Giuliani Partners Helped Purdue Pharma Develop Various Programs To Monitor Prescription Drugs And Educate Police.** “In consultation with Giuliani Partners, Purdue Pharma is [working on] development and recommendation of a national standard for prescription monitoring programs; education programs for healthcare and law enforcement professionals on diversion detection techniques; development of programs to help prevent cross-border smuggling of controlled substances.” (Giuliani Partners, “Purdue Pharma Engages Giuliani Partners As External Advisor,” Press Release, 5/28/02)

“Purdue Pharma, The Maker Of The Painkiller Oxycontin ... Was Facing Stricter Federal Regulation After Reports That Its Misuse As A Narcotic Had Led To More Than 400 Deaths. ... Soon After, Purdue Retained Giuliani Partners.” (Michael Crowley, “Profit Sharing,” *The New Republic*, 9/6/04)

- **“As A Consultant [Giuliani] Attended Two Meetings In 2002 To Discuss Oxycontin With Purdue Executives And [Asa] Hutchinson, The D.E.A. Administrator At The Time.”** (Eric Lipton, “Giuliani, Selling His Public Image, Branches Out For Private Profit,” *The New York Times*, 2/22/04)

While Working For Purdue, Giuliani Won Contract From DOJ To Investigate OxyContin Abuse. “About 10 months after Mr. Giuliani's firm began its work for Purdue, it also won a \$1.1 million contract from the Department of Justice to look for ways to improve the effectiveness of the Organized Crime Drug Enforcement Task Force. The force's duties included helping investigate OxyContin abuse, and Purdue officials had appealed to its director, Karen Tandy, for help, a Justice Department official said.” (Eric Lipton, “Giuliani, Selling His Public Image, Branches Out For Private Profit,” *The New York Times*, 2/22/04)

- **Bill Allison, The Center For Public Integrity:** “On the one hand he is representing a client with a problem before the D.E.A., and on the other hand he has a contract with the Justice Department that has him talking to agents at the D.E.A. ... That sure seems to be a conflict to me.” (Eric Lipton, “Giuliani, Selling His Public Image, Branches Out For Private Profit,” *The New York Times*, 2/22/04)

Giuliani Partners Formed Strategic Alliance With Nextel While Consulting FCC On Crisis Communications

Giuliani Partners Joined Nextel In Strategic Alliance To Resolve Communication System Interference Issues. “Nextel Communications Inc., a leading provider of fully integrated wireless communications services, and Giuliani Partners LLC today announced a strategic alliance to significantly improve public safety communications across the United States. The public safety community is facing two critical communications challenges – the need to resolve interference to their communications systems and to allow for instant, rapid, secure communications capabilities between public safety authorities across multiple jurisdictions. Giuliani Partners will contribute expert advice with regard to the communication needs of public safety authorities and key members of the Giuliani Partners team will provide guidance on the implementation of the solution.” (Giuliani Partners, “Nextel And Giuliani Partners Announce Strategic Alliance To Improve Public Safety Communications,” Press Release, 5/2/02)

- **“Nextel Has Hired Giuliani And His Firm For \$15 Million After It Was Discovered That Nextel's Two-Way-Radio Phones Cause Interference For Some Radio Stations ...”** (Brody Mullins and Michael E. Grass, “Rainmakers,” *Roll Call*, 3/1/04)

Giuliani Did Not Register As A Lobbyist, Saying Activities Did Not Constitute Lobbying. “Though he is working for the company, Giuliani does not plan to register as a lobbyist. Giuliani ... believes that the government relations help he provides to Nextel and his other corporate clients does not constitute lobbying.” (Brody Mullins and Michael E. Grass, “Rainmakers,” *Roll Call*, 3/1/04)

Giuliani Profited From Partnership With Nextel While Advising FCC On Crisis Communications Issues. “And Nextel Communications, the wireless phone carrier based in Reston, Va., has offered [Giuliani Partners] compensation worth at least \$15 million, in part to help its pursuit of an important reshuffling of the radio spectrum from the Federal Communications Commission. At the same time, Mr. Giuliani and his staff have also served as unpaid advisers to the F.C.C., spending more than a year helping prepare a report about how local governments can best communicate with the public during catastrophic events, an assignment that was brokered by Nextel's chief regulatory counsel.” (Eric Lipton, “Giuliani, Selling His Public Image, Branches Out For Private Profit,” *The New York Times*, 2/22/04)

Giuliani Capitol Advisers Served As Financial Advisor For Sun World International, Inc.
(Giuliani Capitol Advisers, www.giulianicapitaladvisors.com Accessed 4/23/07)

In 1999, Sun World Appointed “To Develop And Manage One Of The Largest Planned Agricultural Developments In The World” Owned By Saudi Prince Alwaleed Bin Talal. “Cadiz Inc. announced today that its wholly owned subsidiary, Sun World International Inc. (Sun World), was appointed by Kingdom Agricultural Development Company (KADCO), a company currently 100% controlled by His Royal Highness Prince Alwaleed Bin Talal Bin Abdulaziz Alsaud, to develop and manage one of the largest planned agricultural developments in the world. KADCO has committed \$ 300 million in equity to develop up to 100,000 acres of agricultural land in southern Egypt, called the Tushka Project (Tushka).” (Cadiz, Inc. “Prince Alwaleed Bin Talal Appoints Cadiz To Develop & Manage the Tushka Project in Egypt,” Press Release, 6/2/99)

In 2002, Sun World Announced Plans To Merge With Saudi Agriculture Company To Help Expand Sun World-KADCO Partnership “To Create An Agriculture Industry In Southern Egypt.” “Another blow to Sun World was the escalated reaction by the public to the company’s announcement to merge with a Saudi-owned firm. The proposed sale of nearly a half-interest of Sun World to Kingdom Agricultural Development Co. was announced in January by Sun World’s parent company Cadiz Inc. KADCO, as the Saudi-company is known, is controlled by Prince Alwaleed Bin Talal Bin AbdulAziz, a member of the royal family of Saudi Arabia. ... The merger would enable Sun World and KADCO to create an agriculture industry in Southern Egypt, using Sun World’s expertise in growing crops in the desert and KADCO’s 100,000 acres in Egypt, called the Tushka Project.” (Nadia Villagran, “Businesses Adjust To New Regulations,” *The [Palm Springs, CA] Desert Sun*, 3/10/02)

- **“The Proposal Came Under Stiff Criticism By Social Groups” Due To Prince Alwaleed Bin Talal’s 9/11 Comments.** “The proposal came under stiff criticism by social groups because Prince Alwaleed’s \$10 million contribution to the Sept. 11 recovery effort was rejected by former New York Mayor Rudolph Giuliani when the prince issued a statement calling on the United States to take a “more balanced” stand toward the Palestinians in the Middle East conflict.” (Nadia Villagran, “Businesses Adjust To New Regulations,” *The [Palm Springs, CA] Desert Sun*, 3/10/02)
- **Sun World Defended The Deal.** “[Mike] Aiton [Senior Vice President Of Sales And Marketing] admits Sun World considered the controversy of the rejected donation before announcing the proposed merger. ‘But we weren’t overly concerned,’ he said. ‘Ultimately, we’re going to have a better chance of success by dealing with people from other countries,’ Aiton said. ‘I think the United States wants to be and needs to be involved with other countries in a positive way.’” (Nadia Villagran, “Businesses Adjust To New Regulations,” *The [Palm Springs, CA] Desert Sun*, 3/10/02)
- **Deal Eventually Broke Down Due To “Technical Problems” And Regulatory Issues With The Egyptian Government.** “Cadiz Inc., which is proposing to build a \$150-million water storage facility in the Mojave Desert in partnership with the Metropolitan Water District of Southern California, said Wednesday that its plan to merge its agricultural operations with those of a wealthy Saudi prince had fallen through. ... Beyond mentioning ‘technical reasons,’ Cadiz did not say why the proposed merger, first announced in January, had broken down. But [Cadiz Chief Executive Keith] Brackpool told investors in May that the deal had run into regulatory problems with the Egyptian government. Under terms of the deal, Kadco would have acquired 49.75% of Sun World.” (Michael A. Hiltzik, “Merger Plan Fails for Cadiz, Kadco,” *Los Angeles Times*, 7/11/02)

BRACEWELL GIULIANI

Bracewell And Giuliani Represented A Variety Of Clients

“Bracewell Serves A Wide Array Of U.S. And International Clients, Including Fortune 500 Companies And Government And Public Entities.” (Bracewell Giuliani Website, www.bracewellgiuliani.com Accessed 1/29/07)

- **Bracewell And Giuliani Involved In Energy, Banking & Corporate Finance, Bankruptcy & Corporate Restructuring, Caspian Region, Trial, Latin America, Environment, Government Relations, Strategic Communications, Tax, Intellectual Property, Real Estate, Government Contracting, Labor And Employment And School And Public Law.** (Bracewell Giuliani Website, www.bracewellgiuliani.com, Accessed 1/29/07)

Bracewell Giuliani's Clients Included AOL Time Warner, Apple Computer, Inc., Bank of America, BC Hydro, Bechtel Corporation, BJ Services Middle East, Calpine Corporation, ChevronTexaco Corp., Coral Energy, Dynegy Inc., Eaton Corporation, FPL Energy, General Electric Company, Guaranty Bank, Houston Community College System, Houston Livestock Show and Rodeo, Kinder Morgan Energy Partners, L.P., Kinder Morgan Management, L.L.C., Kinder Morgan, Inc., KPMG, Louisiana-Pacific Corporation, PG&E Transmission, Reliant Energy Inc., San Antonio Spurs, Service Corporation International, Société Générale Group, Southwest Airlines, Sysco Corporation, Tampa Electric/Peoples Gas System, Temple-Inland Inc., The Goodyear Tire & Rubber Company, USAA, Valero Energy Corporation. (“Representative Clients,” [Bracewell Giuliani](http://BracewellGiuliani.com), Accessed 2/24/07)

Giuliani And The Firm Refused To Publicly Name All Clients

Bracewell Firm Won't Disclose Clients Brought In By Giuliani. “That profile will only get bigger as Mr. Giuliani pursues the presidency. What is less clear is whether all that attention will pay off financially. While Mr. Giuliani has attracted lawyers to the office and used his celebrity and connections to get the firm meetings it might not otherwise have, his rainmaking abilities are harder to assess. The firm won't identify new clients Mr. Giuliani has brought in.” (Nathan Koppel, “Can Giuliani's Name Turn Buzz Into Money?” *The Wall Street Journal*, 3/20/07)

- **Giuliani Declined To Name Clients He Brought To Bracewell.** “I've met with a lot of new prospective clients of which many have turned into clients,’ Mr. Giuliani says, also declining to name names.” (Nathan Koppel, “Can Giuliani's Name Turn Buzz Into Money?” *The Wall Street Journal*, 3/20/07)

Giuliani Not In Court, But Active In Bracewell And Giuliani Affairs

When He Joined Bracewell, Giuliani Said He Was Itching To Return To The Courtroom. That Hasn't Happened. 'I Have Not Found A Case To Get Back Into The Courtroom Yet,' He Says. 'But We Still Might.'” (Thom Weidlich, “Giuliani Law Firm Offers Texas Foothold as 2008 Decision Looms,” *Bloomberg News*, 1/30/07)

- **“Mr. Giuliani, By All Accounts, Does Little Actual Lawyering.”** (Nathan Koppel, “Can Giuliani's Name Turn Buzz Into Money?” *The Wall Street Journal*, 3/20/07)
- **“Giuliani Splits His Days Between The Law Firm And Giuliani Partners LLC, A Consulting Business That Includes Investment Bank Giuliani Capital Advisors LLC.”** (Thom Weidlich, “Giuliani Law Firm Offers Texas Foothold as 2008 Decision Looms,” *Bloomberg News*, 1/30/07)

Giuliani Brought New Wall Street Firms Into The Law Firm

Giuliani Brought Hedge Funds And Private Equity Firms To Bracewell And Giuliani New York Office. “Lawyers joining the New York office of Giuliani’s firm are bringing clients that include hedge funds and private-equity firms such as New York-based D.E. Shaw, with \$26 billion under management; Chicago-based Citadel Investment Group LLC, with \$13.4 billion; and New York-based MatlinPatterson Global Advisers LLC, with \$3.8 billion.” (Thom Weidlich, “Giuliani Law Firm Offers Texas Foothold as 2008 Decision Looms,” *Bloomberg News*, 1/30/07)

- **Giuliani ... Has Assembled A Manhattan Practice Of 32 Corporate Lawyers And Litigators. They’ve Helped Bring Clients That Include Hedge Funds Such As D.E. Shaw & Co. And Investment Banks Such As Bank Of New York Co. -- A Widening Wall Street Base That May Also Hold Political Value.”** (Thom Weidlich, “Giuliani Law Firm Offers Texas Foothold as 2008 Decision Looms,” *Bloomberg News*, 1/30/07)

Bracewell Giuliani Represented The Saudi Arabian Oil Ministry

The Associated Press: Giuliani’s Law Firm Worked On Behalf Of Saudi Arabian Oil Ministry. “In addition to its lobbying clients, Bracewell & Giuliani ... also is working for Saudi Arabia. In March, the firm filed papers in a Texas court case on behalf of Saudi Arabia’s oil ministry taking sides with another international energy giant, Citgo, which is controlled by Venezuelan President Hugo Chavez, a rival of the Bush administration. One month after the 2001 terrorist attacks, then-Mayor Giuliani famously rejected a \$10 million check from a Saudi prince to help terrorism victims. Giuliani spokeswoman Comella declined to comment on the firm’s Saudi connection.” (Sharon Theimer, “Giuliani Firm Lobbied Government,” *The Associated Press*, 5/14/07)

The Hugo Chavez-Allied Mayor Of Mexico City Paid Giuliani \$4.3 Million To Reform Police And Reduce Crime In Mexico City

Giuliani And Lopez Obrador Reached Deal Where Giuliani’s Firm Would Lead Crime Reduction Effort In Mexico City. “After years of experiencing spiraling crime and low confidence in police, Mexico City officials have turned to Rudolph Giuliani for guidance on how to tilt the odds against bad guys who seemingly work undisturbed in one of the world’s largest metropolitan centers. Mexico City Mayor Andres Manuel Lopez Obrador and Mr. Giuliani announced a deal Thursday in which the much-heralded former mayor of New York and his new security consulting firm will assess Mexico City’s crime rates, its police department, and produce a list of recommendations.” (Ricardo Sandoval, “Mexico City Calls Upon New York’s Crime Fighter,” *The Dallas Morning News*, 10/11/02)

- **“As Mexico City Mayor From 2000 To 2005, [Lopez Obrador] Hired Former New York Mayor Rudolph Giuliani To Create A Zero-Tolerance Policy To Help Reduce Crime.”** (Letta Tayler, “In Mexico, A Leftist Roars,” *Newsday*, 6/23/06)

Calderon Called Lopez Obrador “An Ally Of Venezuela’s President Hugo Chavez.” “[Felipe] Calderón, a Harvard-educated former energy secretary running on the National Action Party ticket of outgoing President Vicente Fox, calls López Obrador ‘a danger to Mexico’ and an ally of Venezuela’s President Hugo Chávez, a virulent foe of the United States.” (Letta Tayler, “In Mexico, A Leftist Roars,” *Newsday*, 6/23/06)

- **“[Lopez Obrador’s] Harshest Critics Say He Is A Quixotic Populist, Like Venezuela's Leader, Hugo Chavez, Who Has Sent The Once Oil-Rich Economy Sinking.”** (Monica Campbell, “Clean And Austere Mexico’s Next President?” *Christian Science Monitor*, 3/17/04)

Mexican Billionaire Working With Lopez Obrador Picked Up “Some Of The Costs For Mr. Giuliani’s Services.” “Officials in Mexico City said privately, however, that a billionaire

businessman, Carlos Slim, would most likely pay some of the costs for Mr. Giuliani's services. Mr. Slim has been working with Mexico City's mayor, Andres Manuel Lopez Obrador, to bring order to the city." (Lydia Polgreen, "Giuliani Firm Gets Contract To Advise Mexico City Police," *The New York Times*, 10/11/02)

Media Reports Indicate Giuliani's Firm Received \$4.3 Million Fee In Mexico City Deal.

"Lopez Obrador's popularity results in part from \$70-a-month stipends for the elderly and single women that he instituted as mayor. ... In one of his most controversial moves, he hired former New York Mayor Rudolph Giuliani in 2002 as a consultant, for a fee of \$4.3 million, to help combat crime." (Susan Hayward, "Mexico City's Mayor Stares Down President And Congress," *Philadelphia Inquirer*, 5/1/05)

Giuliani's Contract Ended After Roughly One Year, Resulted In List Of 146

Recommendations. "The working relationship effectively ended in August of 2003, after the Mexico City police department decided, without permission from New York, to translate into Spanish and release 146 recommendations based on Giuliani Partners consulting." (Daniela Gerson, "In Mexico City, Few Cheers For Giuliani," *The New York Sun*, 4/11/05)

At Bracewell Giuliani, Giuliani Brokered A Meeting Between The Law Firm and Royal Dutch Shell Which Is Headquartered In The Netherlands

Giuliani Brokered Meeting Between Bracewell Giuliani And Royal Dutch Shell. "In the summer of 2005, Mr. Oxford says, he traveled to London with Mr. Giuliani to meet top executives of what is now Royal Dutch Shell PLC. Mr. Oxford says the firm could not have scored the high-level meeting without Mr. Giuliani: 'Leaders around the world admire Rudy and want to talk to him.' The meeting didn't bring in any new business, but Mr. Oxford says he believes that Bracewell solidified its stature with the energy company. The company confirmed the meeting but declined to elaborate." (Nathan Koppel, "Can Giuliani's Name Turn Buzz Into Money?" *The Wall Street Journal*, 3/20/07)

Giuliani Has Worked On More Than One Occasion For The Spanish Bank Santander

"He Has Worked On 'Three Or Four' Cases, He Says. One Was For Banco Santander Central Hispano SA, Spain's Biggest Bank, Which Wanted To Buy 20 Percent Of Sovereign Bancorp Inc." (Thom Weidlich, "Giuliani Law Firm Offers Texas Foothold as 2008 Decision Looms," *Bloomberg News*, 1/30/07)

Bracewell Giuliani Was Registered To Lobby For Banco Santander Starting In 2006. ([Senate Office Of Public Records](#), Accessed 11/16/16)

Giuliani Capital Advisors Listed Sarna Kunststoff, A Swiss Company As Their Client



SARNA KUNSTSTOFF HOLDING AG

has sold
**Sarnamotive Blue Water, Inc. and
Sarnamotive Mexico, S. de R.L. de C.V.**
to a company formed by
KPS Special Situations Funds

THE UNDERSIGNED ACTED AS A FINANCIAL ADVISOR
TO SARNA KUNSTSTOFF HOLDING AG.

GIULIANI
CAPITAL ADVISORS

Sarna Kunststoff Is Headquartered In Switzerland. ([Bloomberg](#) Accessed 11/16/16)

Giuliani Capital Advisors Listed Meyn, A Company Based In The Netherlands As Their Client



MEYN INTERNATIONAL B.V.
(Oostzaan, Netherlands)

a wholly-owned subsidiary of
TAEC Holding Corp.
has been acquired by

Alpha Equipment Holding B.V.
(Amsterdam, Netherlands)

THE UNDERSIGNED ACTED AS FINANCIAL ADVISOR
TO TAEC HOLDING CORP.

GIULIANI
CAPITAL ADVISORS

Meyn Is Headquartered In The Netherlands. ([Bloomberg](#) Accessed 11/16/16)

Former Enron Counsel James Derrick

Bracewell & Giuliani Defended Former Enron General Counsel James V.Derrick In Lawsuits Brought By Beneficiaries Of The Enron Retirement Plan. (*Newby v. Enron Corp.*, 2002 U.S. Dist. LEXIS 3949 *Chao v. Enron Corp.*, 2006 U.S. Dist. LEXIS 70081)

ANDERSON KILL OLICK & OSHINSKY

During The Early 1990s, Giuliani Was A Partner At Anderson Kill Olick & Oshinsky

Giuliani Earned \$294,000, Shared "In All Fees From...Clients." "...Giuliani, [is] a \$ 294,000-a-year partner who shares in all fees from Anderson Kill clients..." (Kevin Flynn, "Rudy s Screen Test," *Newsday*, 9/27/93)

Giuliani's Role Echoed '89 Controversies. "The last time he ran for mayor, Rudolph Giuliani quit a major Manhattan law firm when controversy erupted over the firm's representation of the government of Panamanian Gen. Manuel Noriega....But just as in 1989, the question of how much Giuliani participated in screening his firm's clients could become part of the debate as voters scrutinize just what kind of law Giuliani practiced and what kind of law firm he has worked with since his last bid for office." (Kevin Flynn, "Rudy's Screen Test," *Newsday*, 9/27/93)

Anderson Represented Numerous Controversial Clients

Anderson Represented "A Number Of Controversial Clients." "The last time he ran for mayor, Rudolph Giuliani quit a major Manhattan law firm when controversy erupted over the firm's representation of the government of Panamanian Gen. Manuel Noriega. Four years later, as he presses forward with his second campaign against David Dinkins, Giuliani is again aligned with a major law firm - Anderson Kill Olick & Oshinsky - and it too represents a number of controversial clients." (Kevin Flynn, "Rudy's Screen Test," *Newsday*, 9/27/93)

- **Large Firms Like Anderson Typically Screen Their Clients.** "Many firms that operate in the same arena as Anderson Kill broadly screen clients on image, economic or moral grounds, according to Stephen Gillers, a professor of legal ethics at New York University Law School. 'Law firms definitely do debate whether to accept a new client based on their perceptions of whether the client is politically or personally offensive,' Gillers said." (Kevin Flynn, "Rudy's Screen Test," *Newsday*, 9/27/93)

"Adverse Information" About Anderson Client's Was "Widely Circulated." "Adverse information about some of Anderson Kill's clients was reported in widely circulated publications. In addition, some analysts expected that, given Giuliani's experience in 1989, he would have made a point of screening his new firm's clients." (Kevin Flynn, "Rudy's Screen Test," *Newsday*, 9/27/93)

Anderson Clients Carl Zeiss And Preussag AG Allegedly Supplied Iraq's Chemical Weapons Program

Clients Were Identified In Internal Memo Circulated One Year After Giuliani Joined Firm. "In the case of two German companies suspected of aiding Iraq in its chemical weapons production - Carl Zeiss and Preussag AG - Anderson Kill partners apparently were given a memo naming these incoming clients in the fall of 1991, about a year after Giuliani joined the firm and months after Operation Desert Storm, according to lawyers at the firm. The memo was circulated as the firm debated whether to accept a new partner, David Toren, and his \$ 4-million-a-year 'intellectual property' practice into the firm. Anderson Kill lawyers were asked to review Toren's client list for possible conflicts with the firm's existing clients." (Kevin Flynn, "Rudy's Screen Test," *Newsday*, 9/27/93)

- **Anderson Routinely Circulated Such Memos.** "Lawrence Kill, chairman of the executive committee at Anderson Kill, declined to talk about or release any memos related to Toren's clients, citing client confidentiality. But he agreed it would have been standard procedure for such a memo to have circulated." (Kevin Flynn, "Rudy's Screen Test," *Newsday*, 9/27/93)
- **Giuliani Denied Seeing Memo.** "[Denny] Young said Giuliani never saw such a memo and had 'nothing to do with the review or selection process' of Toren." (Kevin Flynn, "Rudy's Screen Test," *Newsday*, 9/27/93)
- **Anderson Chairman Denied Knowledge Of The Allegations.** "Kill said the firm was not aware of the allegations against the German clients and neither was Toren, who only performed patent and trademark work for the companies. The firm said it does not

routinely make background checks on clients aside from reviewing for potential conflicts.”
(Kevin Flynn, “Rudy’s Screen Test,” *Newsday*, 9/27/93)

Anderson Client Directory Listed Four Other Companies Accused Of Aiding Hussein Regime.

“Anderson Kill’s client directory also lists four other firms that have been accused in some way of helping the Iraqi military buildup. But it is not clear that Giuliani or the firm could have easily found out about them because the reports were only carried in foreign magazines or specialized journals.” (Kevin Flynn, “Rudy’s Screen Test,” *Newsday*, 9/27/93)

- **One Company Was Operated By Family Of Nazi War Criminal.** “One of the other companies listed last year as a Toren client on Anderson Kill’s ‘Matter File Listing’ is German farm-equipment manufacturer Karl Mengele & Sons, the family firm of Nazi war criminal Josef Mengele. The U.S. Justice Department has said that the Mengele firm, founded by the father of the sadistic death-camp doctor, supplied economic support to the ‘Angel of Death’ during the decades when he was a fugitive.” (Kevin Flynn, “Rudy’s Screen Test,” *Newsday*, 9/27/93)
- **Anderson Denied Representation Of Mengele Company.** “But Kill said the Mengele company was never a client of Anderson Kill and had not paid his firm ‘a red cent’ in legal fees. He said the Mengele firm is a former client of Toren’s that was included on Anderson Kill’s client list just in case a potential conflict arose in years to come. In addition, Kill identified Toren as a Jew who himself escaped from Nazi Germany during the Holocaust. He stressed that neither he nor the firm was aware of the history of the Mengele firm.” (Kevin Flynn, “Rudy’s Screen Test,” *Newsday*, 9/27/93)

Carl Zeiss Was Linked To Both Iraq’s And Iran’s Weapons Programs

Carl Zeiss Microscopes “Were Found In An Iraqi Chemical Weapons Facility.” “Carl Zeiss: Large German manufacturer suspected of having supplied equipment used by Iraq for chemical weapon production and to enhance its SCUD missile system. Zeiss microscopes were found in an Iraqi chemical weapons facility and Zeiss computerized mapping equipment was used to help target Iraqi missiles, according to two U.S. senators and the Wisconsin Project on Nuclear Arms Control. The company has not been charged with any crimes. The company says it never knew its equipment was to be used for military purposes. Furthermore, a company spokesman said, the mapping equipment was sold under a Department of Commerce export license during a period when there were no UN or U.S. restrictions on trade with Iraq.” (Kevin Flynn, “Rudy’s Screen Test,” *Newsday*, 9/27/93)

- **U.S. Senate Staff Found “Conclusive Evidence” That Zeiss Supplied Iraqi Military Program.** “Senate Foreign Affairs Committee Chairman Claiborne Pell (D-R.I.) said at the end of the hearing that committee staff members who have visited Iraq have brought back conclusive evidence that three major German industrial corporations -- Fried. Krupp GMBH, Carl Zeiss and Man Aktiengesellschaft -- had supplied high-tech equipment to the Iraqi military program.” (Thomas W. Lippman, “International Banks Said To Be Financial Supporters Of Iraqi Nuclear Program,” *The Washington Post*, 10/18/91)

Zeiss Also Reportedly Sold To Iran. “Iran, which may be trying to develop nuclear weapons, bought technology with potential military use from U.S. companies in recent years, documents show. The U.S. government approved the exports even though the State Department steadily has labeled Iran a supporter of international terrorism... Government licenses, granted by the Commerce Department, are required to export such dual-use technology... Other companies selling equipment to both Iran and Iraq were...Carl Zeiss Inc., \$ 85,000” (Marcy Gordon, “Companies Sold Technology to Both Iran and Iraq, Documents Show,” *Associated Press*, 5/14/92)

Preussag AG Was Tied To Both Iraq's And Libya's Weapons Programs

Preussag Was Suspected Of Supplying Weapons Facilities In Iraq And Libya. "Preussag Ag: German manufacturer suspected of having supplied equipment used in chemical weapons plants in Libya and Iraq, according to a report by the U.S. House Committee on Foreign Affairs. In February, 1991, the company acknowledged that some of its deliveries to Iraq were used for 'purposes other than the declared purposes and were used in the production of armaments,' according to a Reuter dispatch. But it denied any prior knowledge." (Kevin Flynn, "Rudy's Screen Test," *Newsday*, 9/27/93)

- **Preussag Allegedly Provided "Specialized" Weapons Equipment To Iraq.** "Darmstadt prosecutor Thomas Brand said documents seized from offices of the Preussag company of Hanover indicate it shipped containers and other equipment to Iraq that "with relative certainty, could have been used in the production of chemical weapons." ... It is not against West German law to ship Iraq industrial goods. The legal issue is whether the company knew the consignments would be used to produce chemical weapons. The documents, some seized in 1987, also indicate the company delivered specialized equipment to Iraq that could be used to produce poison gas shells and bombs, he said." (Girard C. Steichen, "Company Accused of Delivering Equipment For Chemical Arms to Iraq," *Associated Press*, 1/22/89)
- **Preussag Was Charged With Negligent Supervision.** "Although the West German government once said that 'in all probability' Preussag provided Iraq with materials that could be used for chemical weapons, it later only charged former employees of the company with the illegal dealings. The company itself was charged with negligent supervision." (Kevin Flynn, "Rudy's Screen Test," *Newsday*, 9/27/93)

Iraqi Declaration Traced Preussag's Role Back To 1982. "The 12,000-page weapons declaration that Iraq delivered to the United Nations on Dec. 7 details the history of its chemical weapons program before the 1991 gulf war, listing dozens of foreign companies that provided most of the chemicals and equipment needed for the program... Among the large European companies are two German conglomerates of the 1980's: Preussag, which is now called TUI, and Hoechst, which has since been split up... The Iraqi declaration said that in 1982, Preussag provided Iraq with 30 tons of phosphorous oxychloride, a chemical used to make the deadly nerve gas sarin, and equipment for its chemical weapons laboratories." (Philip Shenon, "Declaration Lists Companies That Sold Chemicals To Iraq," *The New York Times*, 12/21/02)

- **Preussag Denied The Iraqi Assertions.** "Preussag, since acquired by the travel conglomerate TUI, supplied chemical precursors for sarin nerve gas, according to Iraq's declaration, but the German firm tells CNN that claim is untrue." (CNN's "Wolf Blitzer Reports," 1/17/03)

Bob Dole Placed Preussag On His "Roll Of Dishonor." "Then-Sen. Bob Dole (R-Kan.) included the German company on his 'Roll of Dishonor' in January 1989 for allegedly selling water purification equipment to Libya that was later installed at a poison gas factory. Dole wanted to block the companies on his list from receiving any U.S. business." (Dave Leshner, "Harman Braces For Attack On Foreign Links," *Los Angeles Times*, 4/8/98)

Gulf War Vets Sued Preussag. "About 2,000 US Gulf war veterans are suing German companies which they allege helped the Iraqi leader, Saddam Hussein, to build up a poison gas arsenal, a German magazine reported yesterday. They have filed a civil suit claiming \$ 1 billion (pounds 670 million) in damages for alleged exposure to chemical weapons which they say left them with "Gulf war syndrome", characterised by fatigue, painful limbs, headaches, loss of balance, rashes and diarrhoea, Stern magazine said. The suit alleges that 20 defendants, including the German

companies Thyssen AG, Preussag AG, Degussa AG, Sigma GmbH and Heberger Bau, sold Iraq "substances and equipment" which it used to create chemical weapons." ("U.S. 'Gulf War Syndrome Victims Sue German Firms For \$1BN," *The Guardian* (London), 1/4/95)