#### Case 1:11-cv-00691-LAK-JCF Document 2116-3 Filed 10/24/18 Page 2 of 40

**From:** Steven Donziger <sdonziger@donzigerandassociates.com>

Sent: Monday, December 11, 2017 3:45 PM

**To:** Katie Sullivan < Katie@Streamlinefamilyoffice.com>

**Subject:** Fw: Ecuador budget/talk

**Attach:** 2017.12.09 Ecuador budget.pdf; ATT00001.txt

From: Steven Donziger

Sent: Monday, December 11, 2017 4:44 PM

To: Glenn Krevlin

Subject: Ecuador budget/talk

Glen,

Attached is a budget that shows spending at a rate of roughly \$1m per year for the next two years. We expect to be able to cover the next 12 months under the current raise while actively pursuing new capital up to \$2.5 million under the same terms as the last round in addition to the longer-term and much larger raise indicated in the time line. We now have 80% of the current raise committed if you come in at the level you indicated. We expect the \$1m round to be oversubscribed.

With regard to the terms you requested, we are happy to offer a discount on participation in future rounds. You have been there for us at critical moments and that deserves our appreciation as well as a material reward. I have some ideas about how best to structure the discount to allow us optimal flexibility for the major capital partners we are seeking and whose participation will help put major pressure on Chevron to settle the matter.

Let me know a good time to talk and I will take you through the budget. Katie might join us as she is helping me raise funds. As always, I look forward to hearing your thoughts and insights. Let me know a good time.

Best, SRD

DECEMBI	FR 2017								
	*		ojected	_			rojected	_	
prepared by			dget 201	8			udget 201	L8	
	STREAMLINE	M	onthly			А	nnual		
EXPENSES									
Legal Fee:		ç	25,000			خ	300,000		
	Steven Donziger Aaron Marr Page	\$ \$	5,000				60,000		
	Full time attorney	\$	10,000				120,000		
	Alan Lenczner	\$	10,000			\$	120,000		
	John Phillips	\$	-			\$	-		
	Legal contingency	\$	4,000				48,000		
				\$	44,000			\$	528,000
PR costs									
	Cristina Munoz - Ecuador	\$	500			\$	6,000		
	Press releases	\$	1,000			\$	12,000		
				\$	1,500			\$	18,000
Stipend Po		000000000000000000000000000000000000000	050000000000000000000000000000000000000			100000000000000000000000000000000000000	500000 <u>0</u> 000 <u>000</u> 000		
	Simon Billiness - shareholder support/resolutions	\$	1,500			\$			
	Streamline - administrative/accounting	\$	2,000				24,000		
	Juan Aulestia - Ecuador management	\$ \$	2,000				24,000		
	Luis Yanza - Ecuador community/client relations  FDA - client group	> \$	1,000 3,000			\$ \$	12,000 36,000		
	Rex Weyler	ء \$	2,000				24,000		
	nex weyer	7	2,000	\$	11,500	7	24,000	\$	138,000
Travel								:::: <b>T</b> ::::	
	Travel - Ecuador in country	\$	1,000			\$	12,000		
	Travel - Ecuadorians outside country	\$	4,000				48,000		
	Travel - US, fundraising	\$	8,000			\$	96,000		
	Travel - Canadian attorneys	\$	4,000	_		\$	48,000		
				\$	17,000			\$	204,000
Continger	су			\$	5,000			\$	60,000
TOTAL				\$	79,000			\$	948,000
Onetime į	oayments								
	Sept 2017 Canadian Delegate trip reimbursement to SRD						50,000		
	Peter Grant legal retainer						110,000		
	Reimburse SRD (back salary, direct expenses)						150,000		
	Travel - Chief trip to Ecuador					Ş	20,000	<u>\$</u>	330,000
2018 proj	ected expenses							\$ :	L,278,000
2010 '									
∠u19 proj	ected expenses							\$	948,000

Bus Platinum Privileges



P.O. Box 15284 Wilmington, DE 19850

STREAMLINE FAMILY OFFICE INC DBA CWP ASSOCIATES 30 SPRINGDALE AVE DOVER, MA 02030-2374

#### **Customer service information**

1.888.BUSINESS (1.888.287.4637)

bankofamerica.com

Bank of America, N.A. P.O. Box 25118 Tampa, FL 33622-5118

# Your Business Advantage Checking Bus Platinum Privileges

for December 22, 2017 to December 31, 2017

STREAMLINE FAMILY OFFICE INC DBA CWP ASSOCIATES

### Account number:

#### Account summary

Beginning balance on December 22, 2017	\$0.00
Deposits and other credits	100.00
Withdrawals and other debits	-0.00
Checks	-0.00
Service fees	-0.00
Ending balance on December 31, 2017	\$100.00

# of deposits/credits: 1
# of withdrawals/debits: 0
# of items-previous cycle¹: 0
# of days in cycle: 10

Average ledger balance: \$100.00

¹Includes checks paid,deposited items&other debits

Bank of America Business Advantage



# Dreading the shredding?

Go paperless and make a statement.

- · Eliminate storing and shredding
- · Get email reminders that link to your statements
- · View and download business statements anytime

Just log in to Online Banking, and click on **Profiles & Settings** (in the upper right, next to **Sign Out**). To enroll in Online Banking, visit **bankofamerica.com/smallbusiness**.

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Online Banking TIP OF THE MONTH

#### IMPORTANT INFORMATION:

#### BANK DEPOSIT ACCOUNTS

How to Contact Us - You may call us at the telephone number listed on the front of this statement.

Updating your contact information - We encourage you to keep your contact information up-to-date. This includes address, email and phone number. If your information has changed, the easiest way to update it is by visiting the Help & Support tab of Online Banking.

Deposit agreement - When you opened your account, you received a deposit agreement and fee schedule and agreed that your account would be governed by the terms of these documents, as we may amend them from time to time. These documents are part of the contract for your deposit account and govern all transactions relating to your account, including all deposits and withdrawals. Copies of both the deposit agreement and fee schedule which contain the current version of the terms and conditions of your account relationship may be obtained at our financial centers.

Electronic transfers: In case of errors or questions about your electronic transfers- If you think your statement or receipt is wrong or you need more information about an electronic transfer (e.g., ATM transactions, direct deposits or withdrawals, point-of-sale transactions) on the statement or receipt, telephone or write us at the address and number listed on the front of this statement as soon as you can. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

- Tell us your name and account number.
- Describe the error or transfer you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
- Tell us the dollar amount of the suspected error.

For consumer accounts used primarily for personal, family or household purposes, we will investigate your complaint and will correct any error promptly. If we take more than 10 business days (10 calendar days if you are a Massachusetts customer) (20 business days if you are a new customer, for electronic transfers occurring during the first 30 days after the first deposit is made to your account) to do this, we will provisionally credit your account for the amount you think is in error, so that you will have use of the money during the time it will take to complete our investigation.

For other accounts, we investigate, and if we find we have made an error, we credit your account at the conclusion of our investigation.

Reporting other problems - You must examine your statement carefully and promptly. You are in the best position to discover errors and unauthorized transactions on your account. If you fail to notify us in writing of suspected problems or an unauthorized transaction within the time period specified in the deposit agreement (which periods are no more than 60 days after we make the statement available to you and in some cases are 30 days or less), we are not liable to you and you agree to not make a claim against us, for the problems or unauthorized transactions.

Direct deposits - If you have arranged to have direct deposits made to your account at least once every 60 days from the same person or company, you may call us to find out if the deposit was made as scheduled. You may also review your activity online or visit a financial center for information.

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### Your checking account

STREAMLINE FAMILY OFFICE INC | Account #

9158 | December 22, 2017 to December 31, 2017

#### Deposits and other credits

Date	Description	Amount
12/22/17	Online Banking transfer from CHK 1337 Confirmation# 0597624847	100.00
Total dep	osits and other credits	\$100.00

### Daily ledger balances

Date	Balance (\$)
12/22	100.00
12/22	100.00





# Thank you for your business. Here's to your continued success.

We're committed to finding the smartest path to long-term growth for your business. Our small business specialists will work to help you strengthen your business and plan for the future. Please visit **bankofamerica.com/smallbusiness** to learn more.

ARLLD94V | SSM-02-17-0642.B

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Bus Platinum Privileges



P.O. Box 15284 Wilmington, DE 19850

STREAMLINE FAMILY OFFICE INC DBA CWP ASSOCIATES 30 SPRINGDALE AVE DOVER, MA 02030-2374

#### **Customer service information**

1.888.BUSINESS (1.888.287.4637)

bankofamerica.com

Bank of America, N.A. P.O. Box 25118 Tampa, FL 33622-5118

### **Your Business Advantage Checking Bus Platinum Privileges**

for January 1, 2018 to January 31, 2018

STREAMLINE FAMILY OFFICE INC DBA CWP ASSOCIATES

#### Account summary

Beginning balance on January 1, 2018	\$100.00		
Deposits and other credits	825,020.00		
Withdrawals and other debits	-269,823.79		
Checks	-4,765.21		
Service fees	-599.00		
Ending balance on January 31, 2018	\$549,932.00		

Account number:

# of deposits/credits: 11 # of withdrawals/debits: 33 # of items-previous cycle1: 0

# of days in cycle: 31

Average ledger balance: \$462,602.62

<sup>1</sup>Includes checks paid,deposited items&other debits

Bank of America Business Advantage



### Send payments with ACH

As a small business owner, did you know you can pay vendors and suppliers at other financial institutions — outside of Bank of America — using ACH payments?

Online Banking TIP OF THE MONTH

Simply use Online Banking to make cost-effective electronic fund transfers with ACH: \$10 for next-day delivery and \$3 for 3-day delivery. Log in or enroll at bankofamerica.com/smallbusiness. Click the Transfers tab, then select Send Money to Someone and then Using Their Account

Number at Another Bank

AR7C4SJ9 SSM-02-17-0641.B

#### BANK DEPOSIT ACCOUNTS

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### Your checking account

STREAMLINE FAMILY OFFICE INC | Account # 4660 0179 9158 | January 1, 2018 to January 31, 2018

Deposits and other credits

Date	Description	Amount
01/02/18	WIRE TYPE:WIRE IN DATE: 180102 TIME:1732 ET TRN:2018010200472168 SEQ:2018010200050902/006888 ORIG:ANTONY ABBIATI ID:4740846 SND BK:STATE STREET BANK AND TRUST C ID: 0028 PMT DET:05740000005 04526CHV LLC	250,000.00
01/05/18	WIRE TYPE:WIRE IN DATE: 180105 TIME:1731 ET TRN:2018010500397002 SEQ:2018010500044349/005174 ORIG:JAMES MCCAFFREY ID:4741676 SND BK:STATE STREE T BANK AND TRUST C ID: 0028 PMT DET:0574000000 504702JAMES MCCAFFREY	250,000.00
01/17/18	Offer Fulfillment: Refund FX Wire Fee 1/11/2018	25.00
01/18/18	WIRE TYPE:WIRE IN DATE: 180118 TIME:1652 ET TRN:2018011800403747 SEQ:S0680182933801/454326 ORIG:GLENN J. KREVLIN REVOCABL ID:  BK:CITIBANK, N.A. ID:0008 PMT DET:PER YOUR REQ UEST	250,000.00
01/24/18	WIRE TYPE:WIRE IN DATE: 180124 TIME:1818 ET TRN:2018012400389583 SEQ:2018012400276403/004604 ORIG:DUE TO OTHER - WIRES ID: 8455 SND BK:TD BANK, NA ID: 3673 PMT DET:221947770 RET YOUR R EF 221947770 DATED JAN 24BY TD BANK UTA INVALID BN	24,965.00
01/24/18	Offer Fulfillment: Refund FX Wire Fee 1/17/2018	25.00
01/24/18	Offer Fulfillment: Refund FX Wire Fee 1/17/2018	25.00
01/24/18	Offer Fulfillment: Refund FX Wire Fee 1/17/2018	25.00
01/26/18	WIRE TYPE:WIRE IN DATE: 180126 TIME:1837 ET TRN:2018012600390848 SEQ:2018012600212529/005557 ORIG:DUE TO OTHER - WIRES ID: 8455 SND BK:TD BANK, NA ID 3673 PMT DET:222153806 RTN SNDRF 222153806 DD26JAN BY TD BANK UTA INVLD BNF ACCT NB	24,965.00
01/29/18	WIRE TYPE:WIRE IN DATE: 180129 TIME:1836 ET TRN:2018012900471197 SEQ:2018012900282817/005865 ORIG:DUE TO OTHER - WIRES ID: 8455 SND BK:TD BANK, NA ID: 3673 PMT DET:222318112 RTN YR REF 222318112 DD JAN29 FUNDSRTND BY TD BANK UTA INVAL	24,965.00
01/31/18	Offer Fulfillment: Refund FX Wire Fee 1/24/2018	25.00
Total depo	osits and other credits	\$825,020.00

Bank of America Business Advantage



Online Banking

TIP OF

## Stay informed around the clock

Online Alerts' help keep you informed.

- · Monitor your account balances and receive alerts when payments are due
- · Be notified when transactions have cleared

Log in or enroll at **bankofamerica.com/smallbusiness** and click on **Alerts** in the Activity Center.

'Alerts received as text messages on your mobile access device may incur a charge from your mobile access service provider. This feature is not available on the Mobile website. Wireless carrier fees may apply. © 2017 Bank of America Corporation. | ARVBSJGG | SSM-04-17-0040.8

#### Withdrawals and other debits

Date	Description	Amount
01/11/18	TRANSFER STREAMLINE FAMILY OF:Independent Media In Confirmation# 1870584542	-5,000.00
01/11/18	WIRE TYPE:FX OUT DATE:180112 TIME:1626 ET TRN:20180111100395938 FX:CAD 125000.00 1.2273 BNF:PETER R GRANT LAW CORPORAT ID: 6729 BNF BK:COAST CAPITAL SAVINGS ID:CC19180 PMT DET: 221001274 RETAINER LEGAL FEES POP SERVICES /FXREF/	-101,849.59
01/12/18	WIRE TYPE:WIRE OUT DATE:180112 TIME:1255 ET TRN:2018011200303296 SERVICE REF:009390 BNF:FORUM NOBIS ID: 1194 BNF BK:CITIBANK, N .A. ID: 0116 PMT DET:221092316 LEGAL FEES	-10,000.00
01/12/18	WIRE TYPE:INTL OUT DATE:180112 TIME:1729 ET TRN:2018011200421604 SERVICE REF:924641 BNF:FRENTE DE DEFENSA DE LA AM ID: 3804 BNF BK:BANCO DEL PICHINCHA C.A ID:001901333971 PMT DET:221124746 POP SERVICES	-13,100.00
01/16/18	WIRE TYPE:WIRE OUT DATE:180116 TIME:1055 ET TRN:2018011600509843 SERVICE REF:010587 BNF:PATRICIO SALAZAR CORDOVA ID 5844 BNF BK: CITIBANK, N.A. ID: 6554 PMT DET:221313408 EXPE NSE REIMBURSEMENT	-4,642.74
01/17/18	WIRE TYPE:INTL OUT DATE:180117 TIME:1241 ET TRN:2018011700329277 SERVICE REF:393979 BNF:FUNDACION NAUPA ID: 9591 BNF BK:PRODUBANC O ID:PRODECEQ/(CH1328 PMT DET:221429346 POP SERVIC ES	-15,286.75
01/17/18	WIRE TYPE:FX OUT DATE:180118 TIME:1251 ET TRN:2018011700332430 FX:CAD 5662.93 1.1967 BNF:PETER R GRANT LAW CORPORAT ID: 6729 BNF BK:COAST CAPITAL SAVINGS ID:CC19180 PMT DET: 221430330 TRAVEL REIMBURSEMENT POP OTHER /TRAVEL R	-4,732.12
01/17/18	WIRE TYPE:INTL OUT DATE:180117 TIME:1305 ET TRN:2018011700337725 SERVICE REF:400015 BNF:UYUNKAR DOMING PEAS NAMPIC ID: 9429 BNF BK:BANCO INTERNACIONAL S.A ID:BINTECEQ/(CH0509 PMT DET:221431696 TRAVEL REIMBURSEMENT POP OTHER /	-1,365.00
01/17/18	WIRE TYPE:FX OUT DATE:180118 TIME:1340 ET TRN:2018011700350453 FX:CAD 4510.01 1.1947 BNF:FIRST NATIONS SUMMIT SOCIE ID: 009-0 BNF BK:ROYAL BANK OF CANADA ID:ROYCCAT2 PMT DET:22 1435400 POP OTHER/TRAVEL REIMBURSEMENT /FXREF/TE-3	-3,775.01
01/17/18	WIRE TYPE:FX OUT DATE:180118 TIME:1346 ET TRN:2018011700352763 FX:CAD 9381.39 1.1947 BNF:REX WEYLER ID: 5753 BNF BK:ROYAL BANK O F CANADA ID:ROYCCAT2 PMT DET:221435974 POP SERVICE S /FXREF/TE-3-18-155812625	-7,852.51
01/24/18	WIRE TYPE:WIRE OUT DATE:180124 TIME:1225 ET TRN:2018012400276403 SERVICE REF:007274 BNF:STEVEN DONZIGER ID 8783 BNF BK:TD BANK, NA ID:026013673 PMT DET:221947770	-25,000.00
01/24/18	WIRE TYPE:FX OUT DATE:180125 TIME:1329 ET TRN:2018012400297609 FX:CAD 2646.10 1.1919 BNF:WADDELL PHILLIPS PROFESSIO ID: 1232 BNF BK:BANK OF MONTREAL, THE ID:BOFMCAM2 PMT DET:2 21953396 POP SERVICES /FXREF/TE-2-23-142601523	-2,220.07
01/26/18	WIRE TYPE:WIRE OUT DATE:180126 TIME:0913 ET TRN:2018012600212529 SERVICE REF:004294 BNF:DONZIGER & ASSOCIATES ID: 8783 BNF BK:TD BANK, NA ID: 3673 PMT DET:222153806 LEGAL SER VICES	-25,000.00
01/29/18	WIRE TYPE:WIRE OUT DATE:180129 TIME:0950 ET TRN:2018012900282817 SERVICE REF:005578 BNF:DONZIGER AND ASSOCIATES PL ID 8783 BNF BK:TD BANK, NA ID: 3673 PMT DET:222318112	-25,000.00
01/30/18	WIRE TYPE:WIRE OUT DATE:180130 TIME:1108 ET TRN:2018013000280850 SERVICE REF:006727 BNF:DONZIGER AND ASSOCIATES PL ID:4273938783 BNF BK:TD BANK, NA ID: 3673 PMT DET:222439070	-25,000.00
Total with	drawals and other debits	-\$269,823.79



### Your checking account

STREAMLINE FAMILY OFFICE INC	Account #	9158	Jan	nuary 1, 2018 to January 31, 2018

#### Checks

Amount	Check #	Date	Amount	Check #	Date
-1,143.00	1002	01/23/18	-3,622.21	1001	01/18/18
-\$4,765.21	cks	Total chec			
2	checks	Total # of			

#### Service fees

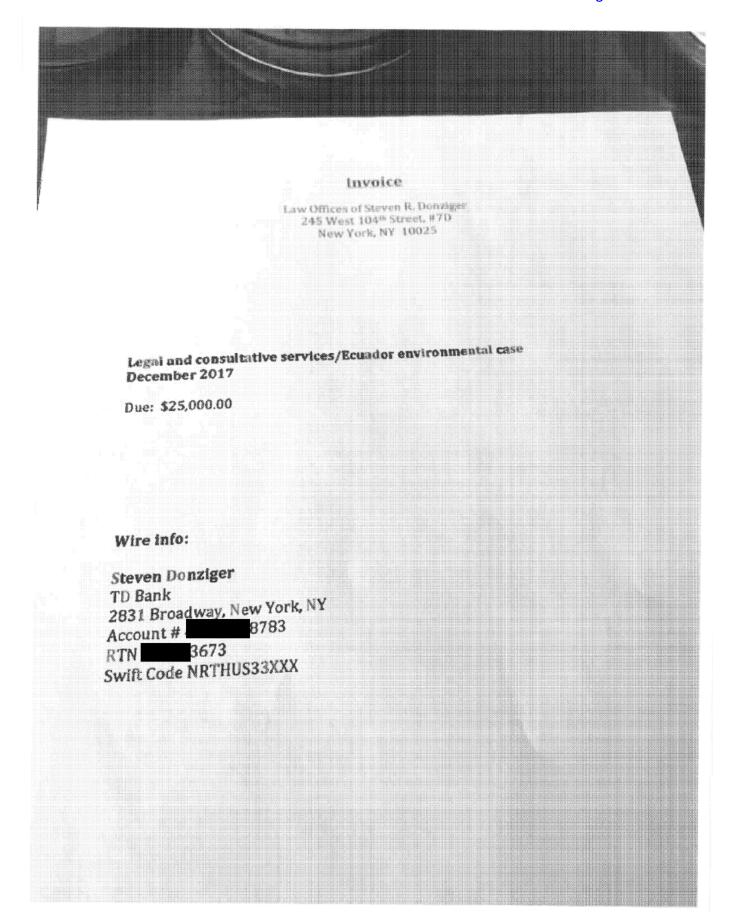
Date	Transaction description	Amount
01/11/18	CHECK ORDER00493 DES:FEE ID:1C5N7911 PMT INFO: PRODUCT(S): 93.18 S&H: 0.00 MA TAX: 5.82	-99.00
01/11/18	Wire Transfer Fee	-35.00
01/12/18	Wire Transfer Fee	-45.00
01/12/18	Wire Transfer Fee	-30.00
01/12/18	External transfer fee - Next Day - 01/11/2018	-10.00
01/16/18	Wire Transfer Fee	-30.00
01/17/18	Wire Transfer Fee	-45.00
01/17/18	Wire Transfer Fee	-45.00
01/17/18	Wire Transfer Fee	-35.00
01/17/18	Wire Transfer Fee	-35.00
01/17/18	Wire Transfer Fee	-35.00
01/24/18	Wire Transfer Fee	-35.00
01/24/18	Wire Transfer Fee	-30.00
01/26/18	Wire Transfer Fee	-30.00
01/29/18	Wire Transfer Fee	-30.00
01/30/18	Wire Transfer Fee	-30.00
Total serv	vice fees	-\$599.00

Note your Ending Balance already reflects the subtraction of Service Fees.

#### Daily ledger balances

Date	Balance (\$)	Date	Balance(\$)	Date	Balance (\$)
01/01	100.00	01/16	365,258.67	01/26	575,002.00
01/02	250,100.00	01/17	332,077.28	01/29	574,937.00
01/05	500,100.00	01/18	578,455.07	01/30	549,907.00
01/11	393,116.41	01/23	577,312.07	01/31	549,932.00
01/12	369,931.41	01/24	575,067.00		

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### Invoice

Law Offices of Steven R. Donziger 245 West 104th Street, #7D New York, NY 10025

Legal and consultative services/Ecuador environmental case January 2018

Due: \$25,000.00

Pd 2/2/2018 +2/5/18

Wire info:

Steven Donziger

TD Bank

2831 Broadway, New York, NY

Account #

RTN 3673

Swift Code NRTHUS33XXX

# Invoice Law Offices of Steven R. Donziger 245 West 104th Street, #7D New York, NY 10025 Invoice, February 2018 Due: \$25,000.00 Wire \$25,000.00: Steven Donziger TD Bank 2831 Broadway, New York, NY Account # 8783 RTN: 3673

2

#### Katie Sullivan

From:

Katie Sullivan

Sent:

Monday, March 12, 2018 6:26 PM

То:

Katie Sullivan

Subject:

Print

#### Invoice

Law Offices of Steven R. Donziger 245 West 104th Street, #7D New York, NY 10025

Date: March 11, 2018

Partial Expense Reimbursement/Ecuador environmental case 2015, 2016, 2017

Due: \$50,000.00

Wire \$50,000:

Steven Donziger TD Bank

2831 Broadway, New York, NY

Account #

0703

RTN: 3673

1

#### Invoice

Law Offices of Steven R. Donziger 245 West 104th Street, #7D New York, NY 10025 2/5/2018
Do not pay intil
SKD approval

Partial reimbursement for legal and consultative services and expenses/Ecuador environmental case

2013-2017

Due: \$200,000.00

Wire \$150,000:

Steven Donziger

TD Bank

2831 Broadway, New York, NY

Account # 8783

RTN 3673

Swift Code NRTHUS33XXX

Wire \$50,000:

Laura B. Miller

Citibank

Account # 6374

RTN:

008-9

Swift Code CITI US 33

Bank of America 🧼

P.O. Box 15284 Wilmington, DE 19850

STREAMLINE FAMILY OFFICE INC DBA CWP ASSOCIATES 30 SPRINGDALE AVE DOVER, MA 02030-2374 Bus Platinum Privileges

#### **Customer service information**

1.888.BUSINESS (1.888.287.4637)

bankofamerica.com

Bank of America, N.A. P.O. Box 25118 Tampa, FL 33622-5118

# Your Business Advantage Checking Bus Platinum Privileges

for April 1, 2018 to April 30, 2018

STREAMLINE FAMILY OFFICE INC DBA CWP ASSOCIATES

#### Account summary

Beginning balance on April 1, 2018	\$368,529.65
Deposits and other credits	0.00
Withdrawals and other debits	-12,107.99
Checks	-0.00
Service fees	-0.00
Ending balance on April 30, 2018	\$356,421.66

Account number:

9158

# of deposits/credits: 0

# of withdrawals/debits: 2

# of items-previous cycle<sup>1</sup>: 0

# of days in cycle: 30

Average ledger balance: \$361,954.92

<sup>1</sup>Includes checks paid,deposited items&other debits

Bank of America Business Advantage

LIFE / BETTER CONNECTED"

## Thanks for enriching your community

During National Small Business Week and throughout the month of May, we'll be celebrating the contribution that businesses like yours make to communities across the nation. You make them more interesting places in which to live and work. Learn more at **bankofamerica.com/SBcelebrate**.

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#### IMPORTANT INFORMATION:

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Updating your contact information - We encourage you to keep your contact information up-to-date. This includes address, email and phone number. If your information has changed, the easiest way to update it is by visiting the Help & Support tab of Online Banking.

Deposit agreement - When you opened your account, you received a deposit agreement and fee schedule and agreed that your account would be governed by the terms of these documents, as we may amend them from time to time. These documents are part of the contract for your deposit account and govern all transactions relating to your account, including all deposits and withdrawals. Copies of both the deposit agreement and fee schedule which contain the current version of the terms and conditions of your account relationship may be obtained at our financial centers.

Electronic transfers: In case of errors or questions about your electronic transfers- If you think your statement or receipt is wrong or you need more information about an electronic transfer (e.g., ATM transactions, direct deposits or withdrawals, point-of-sale transactions) on the statement or receipt, telephone or write us at the address and number listed on the front of this statement as soon as you can. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

- Tell us your name and account number.
- Describe the error or transfer you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
- Tell us the dollar amount of the suspected error.

For consumer accounts used primarily for personal, family or household purposes, we will investigate your complaint and will correct any error promptly. If we take more than 10 business days (10 calendar days if you are a Massachusetts customer) (20 business days if you are a new customer, for electronic transfers occurring during the first 30 days after the first deposit is made to your account) to do this, we will provisionally credit your account for the amount you think is in error, so that you will have use of the money during the time it will take to complete our investigation.

For other accounts, we investigate, and if we find we have made an error, we credit your account at the conclusion of our investigation.

Reporting other problems - You must examine your statement carefully and promptly. You are in the best position to discover errors and unauthorized transactions on your account. If you fail to notify us in writing of suspected problems or an unauthorized transaction within the time period specified in the deposit agreement (which periods are no more than 60 days after we make the statement available to you and in some cases are 30 days or less), we are not liable to you and you agree to not make a claim against us, for the problems or unauthorized transactions.

Direct deposits - If you have arranged to have direct deposits made to your account at least once every 60 days from the same person or company, you may call us to find out if the deposit was made as scheduled. You may also review your activity online or visit a financial center for information.

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Bank of America, N.A. Member FDIC and





### Your checking account

STREAMLINE FAMILY OFFICE INC | Account #

9158 | April 1, 2018 to April 30, 2018

#### Withdrawals and other debits

Date	Description			Amount
04/02/18	AMERICAN EXPRESS DES:ACH PMT WEB	ID:W3940 INDN:CWP Associates	CO ID:1133133497	-1,115.86
04/16/18	AMERICAN EXPRESS DES:ACH PMT WEB	ID:W8574 INDN:CWP Associates	CO ID:1133133497	-10,992.13
Total wit	hdrawals and other debits			-\$12,107,99

#### Service fees

The Monthly Fee on your Business Advantage Checking account was waived for the statement period ending 03/30/18. A che	ck mark below
indicates the requirement(s) you have met to qualify for the Monthly Fee waiver on the account.	

i	\$2.500+	in	new net	purchases	on a	linked	Rusiness	credit c	ard
- 4	 	1111	THEORY FREE	THE CHANGE	3.21 F C	1 111 117 111 1	DUSHIESS	CIECUIL	ai u

\$15,000+ average monthly balance in primary checking account	<b>V</b>	\$15,000+	average	monthly	balance	in	primary	checking	account
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V 5	35.000+	combined	average	monthly	balance ir	linked	business	accounts
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1 3	541 1 1 1 1 1 5 5 m	21500	111	125-411186	£ 3 3	A41118-1118 24	M8-11 11	24111	A 642 / 1 1 640	

(	active	use	of	Pav	/roll	Serv	rices

enrolled in Business Advantage Relationship Rewards

For information on how to open a new product, link an existing service to your account, or about Business Advantage Relationship Rewards please call 1.888.BUSINESS or visit bankofamerica.com/smallbusiness.

### Daily ledger balances

Date	Balance (\$)	Date	Balance(\$)	Date	Balance (\$)
04/01	368,529.65	04/02	367,413.79	04/16	356,421.66

How can we improve your business banking?

Join the **Bank of America**\* **Advisory Panel**. You can help us learn what we're doing right and what we can do better.

To learn more and join, enter code **SBDD** at **bankofamerica.com/advisorypanel** today.

Inclusion on the Advisory Panel subject to qualifications. ©2017 Bank of America Corporation.

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5:41 PM 02/01/18

**Accrual Basis** 

# CWP Associates Profit & Loss Detail

January 2018

Туре	Date	Num	Name	Memo	Amount
dinary Income/Expense Expense					
Administartion					
Check	01/12/2018	1002	Wilson-EPES Printing	Invoive 0028724/Donziger	1,143.00
Total Administartion				•	1,143.00
Bank Service Charg					
Check	01/11/2018		Harland Checks	CHECK ORDER00493 DES:FEE ID:1C5N7911 INDN:	99.00
Check Check	01/11/2018 01/12/2018		Wire fees Wire fees	External transfer fee - Next Day - 01/11/2018 Confirmat	35.00 10.00
Check	01/12/2018		Wire fees	External transfer fee - Next Day - 01/11/2016 Commitmat	30.00
Check	01/12/2018		Wire fees		45.00
Check	01/16/2018		Wire fees		30.00
Deposit	01/17/2018		Wire fees	Offer Fulfillment: Refund FX Wire Fee 1/11/2018	-25.00
Check	01/17/2018		Wire fees		35.00
Check	01/17/2018		Wire fees		35.00
Check Check	01/17/2018 01/17/2018		Wire fees Wire fees		35.00 45.00
Check	01/17/2018		Wire fees		45.00 45.00
Check	01/24/2018		Wire fees		30.00
Deposit	01/24/2018		Wire fees	Offer Fulfillment: Refund FX Wire Fee 1/17/2018	-25.00
Deposit	01/24/2018		Wire fees	Offer Fulfillment: Refund FX Wire Fee 1/17/2018	-25.00
Deposit	01/24/2018		Wire fees	Offer Fulfillment: Refund FX Wire Fee 1/17/2018	-25.00
Check	01/24/2018		Wire fees		35.00
Check	01/26/2018	1	Wire fees		30.00
Check	01/29/2018	3 5	Wire fees Wire fees		30.00 30.00
Check Deposit	01/30/2018 01/31/2018	5	Wire fees	Deposit	-25.00
Total Bank Service 0			vvii e iees	Берозіі	474.00
	•				474.00
Canadian Managen Check	01/17/2018		Rex Weyler	Media coverage, travel reimb, Oct 2017 invoice	7,852.51
Total Canadian Man	agement				7,852.51
Ecuador Manageme	ent				
Check	01/12/2018		FDA	3 months fees/overhead for Ecuador office	13,100.00
Check	01/16/2018		Patricia Salazar	Expense reimbursement	4,642.74
Check Check	01/17/2018 01/17/2018		Domingo Peas Juan Aulestia	trip to Canada 2017 research fees	1,365.00 15,286.75
Total Ecuador Mana			vacar / taloona	-	34,394.49
Legal Fees	gomone				3 1,30 1. 10
Aaron Marr Pag			Famor Nahia	Aug De- 2047 #2 Fb. Jon 42 Feb 2 #7 Fb	40,000,00
Check	01/12/2018		Forum Nobis	Aug-Dec 2017 \$2.5k, Jan 12-Feb 8 \$7.5k	10,000.00
Total Aaron Marr	r Page				10,000.00
Peter Grant					
Check	01/11/2018		Peter R. Grant Law C	Retainer deposit \$125k CAD	101,849.59
Total Peter Gran	t				101,849.59
Steven Donzige					
Check	01/24/2018		Steven Donziger	WIRE TYPE:WIRE OUT DATE:180124 TIME:1225 ET	25,000.00
Deposit	01/24/2018		Steven Donziger	WIRE TYPE:WIRE IN DATE: 180124 TIME:1818 ET T	-24,965.00
Check	01/26/2018		Steven Donziger	returned COEL wire (urene appearant # previded	25,000.00
Deposit Check	01/26/2018 01/29/2018	2	Steven Donziger Steven Donziger	returned \$25k wire/wrong account # provided	-24,965.00 25,000.00
Deposit	01/29/2018	2	Steven Donziger	returned \$25k wire/wrong account # provided	-24,965.00
Check	01/30/2018	4	Steven Donziger	-	25,000.00
Total Steven Dor	nziger			_	25,105.00
Total Legal Fees					136,954.59
Public Relations Check	01/11/2018		Independent Media	TRANSFER STREAMLINE FAMILY OF:Independent M	5,000.00
Total Public Relation			and opendont infolia		5,000.00
Shareholder Advoc					3,000.00
Check	01/12/2018	1001	Simon Billenness	JAN 8, 2018 invoice	3,622.21
Total Shareholder Ad	dvocacy				3,622.21
Travel Canadian travel	l				

Page 1

5:41 PM 02/01/18 Accrual Basis

# CWP Associates Profit & Loss Detail

January 2018

Туре	Date	Num	Name	Memo	Amount
Check Check Check	01/17/2018 01/17/2018 01/24/2018		First Nations Summit Peter R. Grant Law C Waddell Phillips PC	Ed John travel reimbursement Peter Grant and John Phillips travel reimbursement John Phillips travel reimbursement	3,775.01 4,732.12 2,220.07
Total Cana	dian travel				10,727.20
Total Travel					10,727.20
Total Expense					200,168.00
Net Ordinary Income					-200,168.00
Net Income					-200,168.00

Message: This Document has been Produced Natively

#### Case 1:11-cv-00691-LAK-JCF Document 2116-3 Filed 10/24/18 Page 32 of 40

	А	В	E	F	G
	Start Time: Date	Start Time: Time	Participants	From	Body
1					
2	4/23/2018	4/23/2018 11:38:51 PM(UTC+0)	12022512218@s.whatsapp.net Aaron Marr Page 16178173512@s.whatsapp.net Katie Sullivan (owner)	12022512218@s.whatsapp.net Aaron Marr Page	At kids hockey practice in late April in iowa - how did this happen?! Fun tho
3	4/23/2018	4/23/2018 11:38:51 PM(UTC+0)	12022512218@s.whatsapp.net Aaron Marr Page 16178173512@s.whatsapp.net Katie Sullivan (owner)	12022512218@s.whatsapp.net Aaron Marr Page	Any chance we can talk again, or you can let me know status re your attorney? If you send name/#, Steven or I can just get in touch directly.
4	4/23/2018	4/23/2018 11:38:51 PM(UTC+0)	12022512218@s.whatsapp.net Aaron Marr Page 16178173512@s.whatsapp.net Katie Sullivan (owner)	12022512218@s.whatsapp.net Aaron Marr Page	If we can't hear from you, we may need to send a litigation hold letter, and perhaps intervene, which I had hoped wouldn't be necessary. Your lawyer should be able ask Chevron for more time, start a discussion, and we can all work out a process that gets Chevron off your back and avoids court. Otherwise we may need to go to court, which would suck!

Chats Page 1 of 26

international law \* human rights \* the environment

Forum Nobis plle

A PROFESSIONAL LIMITED LIABILITY COMPANY Aaron Marr Page Managing Attorney Forum Nobis PLLC 1015 15th Street NW, Ste 1110 Washington, D.C. 20005 +1 202 618 2218 aaron@forumnobis.org

May 3, 2018

#### **VIA FIRST-CLASS MAIL**

Frank Libby, Esq. LibbyHoopes, P.C. 399 Boylston Street, Suite 600 Boston MA 02116

RE: Acknowledgment of receipt: FDA-related materials, documents, and funds

Dear Mr. Libby:

This letter sets forth certain parameters and acknowledgments regarding the transfer of materials, documents, and funds from your client, Ms. Katie Sullivan, to me, in my capacity as a representative of the *Frente de Defensa de la Amazonzia* (FDA).

#### **Preliminary Statement**

To be clear, I will be acting in this transfer process on behalf of the FDA and not as an agent for Mr. Steven Donziger in his personal capacity.

I am an attorney admitted to practice in the District of Columbia since June 2007. I presently reside in Iowa, where I am also admitted to practice since January 2018.

Ms. Sullivan has transferred, and I have accepted, certain materials and documents relating to—and monies derived from—the Funding Escrow Account as that term has meaning in various FDA investment contracts (hereinafter "the Materials and Funds"). I agree to hold the Materials and Funds solely for uses provided within or consistent with such investment contracts (for example, the Ecuador Judgment Investment Agreement dated Dec. 16, 2017).

I am aware of no Order or other writing from any source having the force or effect of precluding either Ms. Sullivan's transfer or my receipt of the Materials and/or Funds under the terms and conditions set forth herein. To the extent any Order or writing impacts, is deemed to impact, or hereafter comes to impact the Materials and/or Funds, any such Order and/or writing will be duly observed by me.

#### Frank Libby

May 3, 2018

Page 2 of 3

#### **Acknowledgment of Receipt**

This will acknowledge my receipt of the following categories of Materials and Funds as described more fully below: (A) Business records and other operating documents relating to FDA investment contracts previously in Ms. Sullivan's possession; (b) certain monies previously held on account for the benefit of the FDA.

#### The Materials

- (1) Two boxes of documents collected from Mr. Joshua Rizack.
- (2) One 3-ring binder entitled "CWP Associates 2018," containing investment documents.
- (3) One redwell containing statements and transaction detail for a certina American Express card issued in the name of "Steven R. Donziger" (acct number ending in 611013).
- (4) Statements and account activity for Bank of America account issued to CWP Associates (account ending in 9158).
- (5) Quickbooks reconciliation summaries for CWP Associates.
- (6) Invoices/receipts for various litigation related expenses incurred by and reimbursed to Ms. Sullivan.
- (7) Invoices covering various litigation-related expenses submitted to Ms. Sullivan by Steven Donziger, the U.S. Representative for the FDA.

I further understand that Ms. Sullivan has retained copies of the above-described Materials.

#### <u>The Funds</u>

The Funds have been transferred from Bank of America account ending in 9158, opened Dec. 22, 2017 ("BOA Account"). An accounting of the funds—as of the date of account closing—appears immediately below:

Total deposits as of May 1, 2018: \$825,120 (includes returned wire transfers).

Total debits as of May 1, 2018: \$468,698.34 (includes returned wire transfers).

Balance as of May 1, 2018: \$356,421.66.

Payments for each of the following litigation-related expenses were made prior to closing out the BOA account:

#### Case 1:11-cv-00691-LAK-JCF Document 2116-3 Filed 10/24/18 Page 36 of 40

Frank Libby May 3, 2018 Page 3 of 3

- 1. \$2580.30 to Ms. Katic Sullivan for various litigation related expenses incurred by her;
- \$11,796.20 to American Express to cover postage and other litigationrelated charges incurred by Mr. Donziger from April 10, 2018 to May 1, 2018.

Net funds transferred: \$342,045.16 (less any standard wire or bank check fee).

RECEIPT	ACKNOWLI	

hhái	N. 2. 23. 3 - F. N. 28. 10. 10. 10. 10. 10. 10. 10. 10. 10. 10		
,ti	I hereby acknowledge receipt of the Materials	and Funds	
	A Ala	5/3/2018	
	Aaron Marr Page	DATE	
	Acting for the benefit of the		
	Frente de Defensa de la Amazonia		

Case 1:11 Notice to Over 100 1 the extraction of the extraction of

prior to replacement. This check should be negotiated within 90 days.

Void After 90 Days

30-1/1140

Date 05/03/18 10:18:03 AM

No. 1462010035

**NEEDHAM** 

Pay

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NTX

00-53-3364B 11-2010

\*\*Three Hundred Forty One Thousand Nine Hundred Forty Five and 16/100 Dollars\*

AARON M PAGE FBO FDA

Order Of

**CLOSING BALANCE** 

Remitter (Purchased By): CWP ASSOCIATES

Bank of America, N.A. SAN ANTONIO, TX

\*\*\$341,945.16\*\*

Not-Negotiable **Customer Copy** Retain for your Records

001641005388

Notice to Purchaser - In the event that this check is lost, misplaced or stolen, a sworn statement and 90-day waiting period will be required prior to replacement. This check should be negotiated within 90 days. Cashier's Check - Customer Copy

No. 1462010034

Void After 90 Days

30-1/1140

NTX

Date 05/03/18 10:16:09 AM

**NEEDHAM** 

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Pay

\*\*One Hundred and 00/100 Dollars\*

To The AARON M PAGE FBO FDA Order Of

CLOSING BALANCE

Remitter (Purchased By): CWP ASSOCIATES

Bank of America, N.A. SAN ANTONIO, TX

\*\*\$100.00\*\*

Not-Negotiable **Customer Copy** Retain for your Records

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PROTECTED BY FED R. EVID. 502(d) CONFIDENTIAL Case 1:11 Notice to Propose in the extendral instruction is proposed by the extendral instruction and sol-day waiting period with the required on the 21 ashier is Cheology 40 to 100 to prior to replacement. This check should be negotiated within 90 days. **NEEDHAM** 0005 0088231 0037 SUBJECT TO PROTECTIVE ORDER Pay 11-2010 \*\*Two Thousand Five Hundred Eighty and 30/100 Dollars KATIE SULLIVAN Order Of Remitter (Purchased By): CWP ASSOCIATES Bank of America, N.A.

No. 1462010032

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**\*\*\$2,580.30\*\*** 

Not-Negotiable Customer Copy Retain for your Records

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Notice to Purchaser - In the event that this check is lost, misplaced or stolen, a sworn statement and 90-day waiting period will be required prior to replacement. This check should be negotiated within 90 days. Cashier's Check - Customer Copy

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Void After 90 Days

30-1/1140 NTX

Date 05/03/18 10:13:04 AM

**NEEDHAM** 

0005 0088231

SAN ANTONIO, TX

0038

Pay

\*\*Eleven Thousand Seven Hundred Ninety Six and 20/100 Dollars\*\*

AMERICAN EXPRESS Order Of

Remitter (Purchased By): CWP ASSOCIATES

Bank of America, N.A. SAN ANTONIO, TX

Not-Negotiable Customer Copy Retain for your Records

\*\*\$11,796.20\*\*

001641005388

00-53-3364B 11-2010

No. 1462010034

\*\*\$100.00\*\*

Notice to Purchaser - In the event that this check is lost, misplaced or Void After 90 Days Date 05/03/18 10:16:09 AM 30-1/1140 stolen, a sworn statement and 00-day waiting period will be required prior to replacement. This check should be negotiated within 90 days. NTX NEEDHAM 0088231 0005 Pay \*\*One Hundred and 00/100 Dollars\*\* To The AARON M PAGE FBO FDA Order Of **CLOSING BALANCE** Remitter (Purchased By): CWP ASSOCIATES Bank of America, N.A. SAN ANTONIO, TX

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## **Bankof America**

Cashier's Check

Void After 90 Days

30-1/1140

NTX

No. 1462010035

Date 05/03/18 10:18:03 AM

stolen, a sworn statement and 90 day walting period will be required prior to replacement. This check should be negotiated within 90 days. NEEDHAM 0005 0088231

\*\*\$341,945,16\*\*

\*\*Three Hundred Forty One Thousand Nine Hundred Forty Five and 16/100 Dollars\*\*

AARON M PAGE FBO FDA Order Of

Notice to Purchaser - In the event that this check is lost, misplaced or

**CLOSING BALANCE** 

Remitter (Purchased By): CWP ASSOCIATES

Bank of America, N.A. SAN ANTONIO, TX

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