



DEPARTMENT OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL

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March 15, 2016

Exxon Mobil Corporation  
5959 Las Colinas Boulevard  
Irving, Texas 75039-2298

To Whom It May Concern:

Attached please find a subpoena issued today by this Office. We appreciate your prompt attention to its requests.

Your responses to the subpoena should be directed to me and should be produced in the format described in the instructions. Please copy our national counsel, Linda Singer, of Cohen Milstein Sellers & Toll PLLC, on all productions and correspondence relating to this subpoena at the address below.

Linda Singer  
Cohen Milstein Sellers & Toll PLLC  
1100 New York Avenue, NW, Suite 500  
Washington, DC 20005  
(202) 408-4600  
lsinger@cohenmilstein.com

Please feel free to direct any questions regarding our requests or your production to either me or to Ms. Singer. Thank you for your prompt attention to this matter.

Sincerely,

  
Claude Earl Walker, Esq.  
Attorney General

**UNITED STATES VIRGIN ISLANDS  
DEPARTMENT OF JUSTICE**

**IN RE INVESTIGATION OF VIOLATIONS )  
OF THE CRIMINALLY INFLUENCED AND )  
CORRUPT ORGANIZATIONS ACT )  
\_\_\_\_\_ )**

**SUBPOENA**

**TO: Exxon Mobil Corporation  
5959 Las Colinas Boulevard  
Irving, Texas 75039-2298**

You are suspected to have engaged in, or be engaging in, conduct constituting a civil violation of the Criminally Influenced and Corrupt Organizations Act, 14 V.I.C. § 605, by having engaged or engaging in conduct misrepresenting Your knowledge of the likelihood that Your products and activities have contributed and are continuing to contribute to Climate Change in order to defraud the Government of the United States Virgin Islands ("the Government") and consumers in the Virgin Islands, in violation of 14 V.I.C. § 834 (prohibiting obtaining money by false pretenses) and 14 V.I.C. § 551 (prohibiting conspiracy to obtain money by false pretenses).

Therefore, YOU ARE HEREBY DIRECTED, by the authority granted to the Attorney General of the United States Virgin Islands ("USVI"), pursuant to the provisions of 14 V.I.C. § 612, to produce and deliver the documents responsive to the inquiries set forth herein, on or before **April 15, 2016**, directed to the attention of Attorney General Claude Earl Walker, Esq.

Failure to comply with this subpoena may result in an enforcement action being brought against you pursuant to 14 V.I.C. § 612(k).

## INSTRUCTIONS

A. If any document, report, study, memorandum or other written material or information is withheld or not identified under claim of privilege, furnish a list identifying each document or requested information together with the following information (as relevant): date, author, sender, recipient, persons to whom copies were furnished or information provided together with their job titles, subject matter of the document, the basis for the privilege, and the paragraph or paragraphs of the Request(s) to which the document or information is responsive.

B. In each instance in which a document is produced in response to a Request, the current version should be produced together with all earlier versions, or predecessor documents serving the same function during the relevant time period, even though the title of earlier documents may differ from current versions.

C. Any document produced whose text is not already searchable should be processed through Optical Character Recognition ("OCR") so that it is fully searchable.

D. This Investigative Subpoena calls for all described documents in your possession, custody, or control without regard to the person or persons by whom or for whom the documents were prepared (e.g., your company employees, contractors, vendors, distributors, service providers, competitors, or others).

E. The following procedures shall apply to the production, inspection, and copying of documents:

- (a) You shall produce original, complete documents. Documents shall be produced in the order that the documents are maintained in your files, in original folders, with the folder's original file tabs. In response to this Subpoena, true copies of original

documents may be submitted in lieu of originals, provided that you retain the original documents in such manner as to be able to produce them if later required.

1. Any documents produced in response to this Investigative Subpoena should be provided as a Group 4 compression single-page "TIFF" image that reflects how the source document would have appeared if printed out to a printer attached to a computer viewing the file. Extracted text should be included in the manner provided herein. **To the extent that extracted text does not exist, these images should be processed through OCR so that they are fully searchable.** Extracted text and OCR should be provided in separate document level text files. "Load files" shall be produced to accompany the images and shall facilitate the use of the litigation support database systems to review the produced images.
2. **Document Unitization.** Each page of a document shall be electronically converted into an image as described above. If a document is more than one page, the unitization of the document and any attachments and/or affixed notes shall be maintained as it existed in the original when creating the image file and appropriately designated in the load files. The corresponding parent/attachment relationships, to the extent possible, shall be provided in the load files furnished with each production.
3. **Bates Numbering.** Each page of a produced document shall have a legible, unique page identifier ("Bates Number") electronically branded onto the image at a location that does not obliterate, conceal, or interfere with any information from the source document. To ensure that the Bates Numbers do not obscure portions of the documents, the images may be proportionally reduced to create a larger margin in which the Bates Number may be branded. There shall be no other legend or stamp placed on the document image, except those sections of a document that are redacted to eliminate material protected from disclosure by the attorney-client or work product privileges shall have the legend "REDACTED" placed in the location where the redaction(s) occurred or shall otherwise note the location and/or location of the information for which such protections are claimed.
4. **File Naming Conventions.** Each document image file shall be named with the unique Bates Number of the page of the document in the case of single-page TIFFs, followed by the extension "TIF". Each document shall be named with a unique document identifier. Attachments shall have their own unique document identifiers.
5. **Production Media.** The documents should be produced on CD-ROM, DVD, external hard drive (with standard Windows PC compatible interface), (the "Production Media"). Each piece of Production Media shall identify a production number corresponding to the production "wave" the documents on the Production Media are associated with (e.g., "V001", "V002"), as well as the volume of the material in that production wave (e.g., "-001", "-002").

For example, if the first production wave comprises document images on three hard drives, you shall label each hard drive in the following manner: "V001-001", "V001-002", "V001-003". Additional information that shall be identified on the physical Production Media shall include: (1) text referencing that it was produced in response to this Investigative Subpoena, (2) your name, (3) the production date, and (4) the Bates Number range of the materials contained on the Production Media.

6. Objective Coding/Extracted Meta Data. You shall produce with each production of documents extracted metadata for each document (the "Objective Coding") included in the load file. The data file shall include the fields and type of content set forth in the "SPECIAL INSTRUCTIONS FOR ELECTRONICALLY STORED MATERIAL" section. Objective Coding shall be labeled and produced on Production Media in accordance with the provisions set forth above.
  7. Native format for Excel and databases. To the extent that such documents exist in Excel or some other spreadsheet, produce the document in Excel. To the extent that the document constitutes a database, produce the document in Access.
- (b) All attachments to responsive documents shall be produced attached to the responsive documents.
  - (c) No portion of any documents will be masked and the entire document shall be produced.
  - (d) The documents shall be produced at the location set forth or at such other locations as counsel agree.
  - (e) Documents shall be available on reasonable notice for inspection and copying after initial production throughout the term of the investigation or litigation. The documents shall be maintained in the order in which they were produced.
  - (f) You shall label each group of documents in the following manner: Response to Request No. 1; Response to Request No. 2, etc., and identify the Bates Number range for the corresponding documents that are responsive or written responses.
  - (g) Provide a key to all abbreviations used in the documents, providing a method of identifying all documents requiring use of the key.
  - (h) If you obtain information or documents responsive to any request after you have submitted your written responses or production, you should supplement your responses and/or production with any new and or different information and/or documents that become available to you.

(i) If any document responsive to this Subpoena was lost or has been removed, destroyed, or altered prior to the service of this Subpoena, furnish the following information with respect to each such document:

- a description to the extent known, and the last time and location that the document was known to be or is believed to have existed;
- the date, sender, recipient, and other persons to whom copies were sent, subject matter, present location, and location of any copies; and
- the identity of any person authorizing or participating in any removal, destruction, or alteration; date of such removal, destruction or alteration; and the method and circumstances of such removal, destruction, or alteration.

F. This subpoena imposes a continuing duty to produce promptly any responsive information or item that comes into your knowledge, possession, custody, or control after your initial production of responses to the requests.

#### **SPECIAL INSTRUCTIONS**

Electronic documents should be produced in accordance with the following instructions:

A. Single page TIFFs at a 300 DPI resolution which are named for the Bates Number of the page. There should NOT be more than 1000 images per folder.

B. Document level text files containing OCR or extracted text named with the Bates Number of the first page of the document.

C. Data load file containing all of the metadata fields (both system and application – see list below) from the original Native documents – .dat for Concordance.

D. The Concordance .dat file of extracted metadata should be delimited with the Concordance default characters – ASCII 020 for the comma character and ASCII 254 for the quote character. The use of commas and quotes as delimiters is not acceptable.

E. The database field names should be included in the first line of the metadata file listed in the order they appear in the file.

F. An image load file for Concordance – such as “.opt.”

G. For electronic documents created in Excel (spreadsheets) or Access (databases), provide those documents in Native format as well as a TIFF placeholder.

H. For all documents produced, provide the following:

Field #	Field Name	Format	Description
1	BEGDOCNO	Text	Image key of first page of document
2	ENDDOCNO	Text	Image key of last page of document
3	BEGATTACH	Text	For emails/attachments ONLY: Image key of the first page of the parent email. Please DO NOT populate these fields for emails with no attachments.
4	ENDATTACH	Text	For emails/attachments ONLY: Image key of the last page of the last attachment. Please DO NOT populate these fields for emails with no attachments.
5	CUSTODIAN	Text	Custodian from whom documents were collected (semi-colon delimited, if multiple entries)
6	AUTHOR	Text	Email “From” data or user/author name from electronic files
7	RECIPIENT	Text	Email “To” data (semi-colon delimited, if multiple entries)
8	CC	Text	Email “CC” data (semi-colon delimited, if multiple entries)
9	BCC	Text	Email “BCC” data (semi-colon delimited, if multiple entries)

Field #	Field Name	Format	Description
10	MAILSUBJECT	Text	Email subject. This value should be populated down to any children/attachments of the parent email.
11	MAILDATE	MM/DD/YYYY	Email date sent. This value should be populated down to any children/attachments of the parent email.
12	MAILTIME	HH:MM:SS	Email time sent, in military time. This value should be populated down to any children/attachments of the parent email.
13	ATTACHMENTS	Text	Semi-colon delimited list of the original file names of any attachments to an email
14	FILENAME	Text	For emails: Mail subject For attachments and e-files: File name from source media
15	HASH_VALUE	Text	Hash value generated for purposes of de-duplication if performed
16	FileExt	Text	Original file extension for the email or electronic file being produced (e.g., .eml, .pdf, .xls, .doc)

### DEFINITIONS

1. "All" shall be construed to include the collective as well as the singular and shall mean "each," "any," and "every."
2. "Any" shall be construed to mean "any and all."
3. "Climate Change" refers to the general subject matter of changes in global or regional climates that persist over time, whether due to natural variability or as a result of human activity. Any documents or communications using any of the terms "climate change," "climatology," "climate science," "climate model," "climate modeling," "global warming," "greenhouse gas," "greenhouse effect," "CO<sub>2</sub> greenhouse," "climate skeptics," "climate skepticism," "global



cooling," "solar variation," "arctic shrinkage," "carbon tax," "climate legislation," or "Keeling Curve" concern climate change, although documents or communications need not include any of these terms to concern climate change. Any documents or communications concerning rising sea levels, Arctic and/or Antarctic ice melt, declining sea ice, melting glaciers, declining snowfall, oceanic warming, ocean acidification, or increases in extreme weather events—or the opposites of these phenomena (e.g., dropping sea levels, oceanic cooling)—concern climate change, although documents or communications need not refer to any of these phenomena to concern climate change.

4. "Communications" mean any exchange of information by any means of transmissions, sending or receipt of information of any kind by or through any means including but not limited to: verbal expression; gesture; writings; documents; language (machine, foreign, or otherwise) of any kind; computer electronics; email; SMS, MMS, or other "text" messages; messages on "social networking" platforms (including but not limited to Facebook, Google+, MySpace, and Twitter); shared applications from cell phones, "smartphones," netbooks, and laptops; sound, radio, or video signals; telecommunication; telephone; teletype; facsimile; telegram; microfilm; or by any other means. "Communications" also shall include, without limitation, all originals and copies of inquiries, discussions, conversations, correspondence, negotiations, agreements, understandings, meetings, notices, requests, responses, demands, complaints, press, publicity or trade releases and the like that are provided by you or to you by others. Any Communications produced, including emails, should include the original sender, all original recipients, the date and time, and any files originally attached to such emails in the form and filetype in which they were originally attached.

5. "Concerning" means directly or indirectly mentioning or describing, relating to, referring to, regarding, evidencing, setting forth, identifying, memorializing, created in connection with or as a result of, commenting on, embodying, evaluating, analyzing, tracking, reflecting, or constituting, in whole or in part, a stated subject matter.
  
6. "Documents" mean any writing or any other tangible thing, whether printed, recorded (in audio, video, electronically or by any other means), reproduced by any process, or written or produced by hand, including but not limited to: letters; memoranda; notes; opinions; books; reports; studies; agreements; statements; communications (including inter-company and intra-company communications); correspondence; telegrams; email; instant messages; chat logs; SMS, MMS or other "text" messages; posted information; messages; chat logs on "social networking" platforms (including but not limited to Facebook, Google+, MySpace and Twitter); logs; bookkeeping entries; summaries or records of personal conversations; diaries; calendars; telephone messages and logs; forecasts; photographs; images; tape recordings; models; statistical statements; graphs; laboratory and engineering reports; notebooks; charts; tabulations; maps; plans; drawings; minutes; bylaws; resolutions; records of conferences; expressions or statements of policy; lists of persons attending meetings or conferences; lists of clients or customers or suppliers; reports or summaries of interviews; opinions or reports of negotiations; brochures; pamphlets; advertisements; circulars; trade letters; press releases; drafts of any document and revisions of drafts of any document; and any other similar paper or record in any form or medium whatsoever. The term also includes a copy of a document where the copy is not exactly the same as the original. The term also includes emails and other documents made or stored in electronic form, whether kept on computers, computer tapes,

disks, drives, Cloud storage, or other media upon which information may be recorded of any type.

7. "Identify" means:

- (a) When used in connection with a Document, provide the nature of the Document, its title, its description (e.g., memorandum, letter, contract), date, author, its current location, its current custodian, and the number of pages.
- (b) When used in connection with a person, provide that person's name, current residential address and telephone number, job title, and current business address and telephone number. (If current information is not available, provide last-known address and telephone number.)
- (c) When used in reference to an "artificial person" or entity such as a corporation or partnership, provide (1) the organization's full name and trade name, if any; (2) the address and telephone number of its principle place of business; and (3) the names and titles of the entity's officers, directors, managing agents, or employees.
- (d) When used in connection with an oral communication, provide the nature of that communication, the parties to it, the date, place, and substance of that communication, and the identification of any document concerning it.

8. "Including" is used merely to emphasize that a request for certain types of documents or information should not be construed as limiting the request in any way.

9. "Person" means any natural person or such person's legal representative; any partnership, domestic or foreign corporation, or limited liability company; any company, trust, business entity, or association; and any agent, employee, salesman, partner, officer, director, member, stockholder, associate, or trustee.

10. "You" or "Your" refers to Exxon Mobil Corporation, any present or former predecessor, successor, parent, subsidiary, division, d/b/a company, and affiliated entities, as well as all owners, officers, agents, employers, employees, or other representatives thereof, or any other person acting in whole or in part on behalf of any of the foregoing entities. These terms also

refer to the ExxonMobil Foundation, formerly known as the Esso Education Foundation, and/or the Exxon Education Foundation.

### **RELEVANT TIME PERIOD**

The relevant time period, unless otherwise indicated in a specific request, is from January 1, 1977 to the present. The time limits should not be construed as date limits; for example, if a policy, contract, or other document in effect during the relevant time period was created before the relevant time period, then such document must be produced.

### **DOCUMENTS AND INFORMATION TO BE PROVIDED**

- i. All Documents or Communications reflecting or concerning studies, research, or other reviews You conducted or funded (in whole or in part) regarding the certainty, uncertainty, causes, or impacts of Climate Change and models to assess or predict Climate Change or its impacts, as well as all Documents or Communications reflecting or concerning steps You took to address the potential impact of Climate Change on Your operations.
2. All Documents or Communications reflecting or concerning studies, research or other reviews You conducted or funded (in whole or in part) regarding whether and how Your products or activities impact Climate Change at a regional or global level.
3. All public statements You made, including but not limited to advertisements, op-eds, letters to the editor, speeches, and corporate publications, concerning Climate Change, including all drafts of such statements and internal Communications regarding such statements.

4. All minutes of meetings of Your Board and any Board committees reflecting discussions concerning Climate Change and any memoranda to the Board or from Board members concerning Climate Change.
5. All Documents or Communications concerning any potential impacts on Your sales, revenue, or business caused by Climate Change itself, by public policies responding to Climate Change (including any legislation or regulation concerning Climate Change), or by public perceptions of Climate Change.
6. All Documents or Communications concerning research, advocacy, strategy, reports, studies, reviews, or public opinions regarding Climate Change sent to or received from: Global Climate Coalition; Global Climate Science Communications Team (GCSCT, also known as the Global Climate Science Team); Science & Environmental Policy Project (SEPP); National Center for Public Policy Research (NCPPR); Committee for a Constructive Tomorrow (CFACT); Environmental Literacy Council (ELI); Independent Commission on Environmental Education; Environmental Issues Council (EIC); Science and Public Policy Institute (SPPI); Advancement of Sound Science Coalition (or Advancement of Sound Science Center); Heartland Institute; Center for the Study of Carbon Dioxide and Global Change; Tech Central Science Foundation; Beacon Hill Institute at Suffolk University; American Petroleum Institute (AEI); Competitive Enterprise Institute (CEI); American Legislative Exchange Council (ALEC); U.S. Oil & Gas Association; International Petroleum Industry Environmental Conservation Association; American Council for Capital Formation and its Center for Policy Research; Frontiers of Freedom, or its Center for Free Market Environmentalism and Conservation, or its Center for Science and Public Policy; Annapolis Center for Science-Based Public Policy; Atlas Economic Research Foundation; National Black Chamber of Commerce;

U.S. Chamber of Commerce Foundation; George C. Marshall Institute; Heritage Foundation; Manhattan Institute; National Taxpayers Union Foundation; Heartland Institute; Pacific Research Institute for Public Policy; National Center for Policy Analysis; Communications Institute; Washington Legal Foundation; Center for American and International Law (formerly Southwestern Legal Foundation); Foundation for Research on Economics and the Environment (FREE); George Mason University Law and Economics Center; National Center for Public Policy Research; Smithsonian Astrophysical Observatory; International Policy Network; FreedomWorks; Citizens for a Sound Economy; Citizens for a Sound Economy Foundation; Americans for Prosperity; Mercatus Center at George Mason University; Acton Institute for the Study of Religious Liberty; Media Research Center (formerly Cybercast News Service and Conservative News); Institute for Energy Research; Congress of Racial Equality; Reason Foundation; Reason Public Policy Institute; Hoover Institution; Pacific Legal Foundation; Capital Research Center; Center for Defense of Free Enterprise; Federalist Society for Law and Public Policy Studies; National Association of Neighborhoods; National Legal Center for the Public Interest; Center for a New Europe-USA; American Council on Science and Health; Chemical Education Foundation; Property and Environment Research Center (PERC, formerly Political Economy Research Center); Cato Institute; Federal Focus; Fraser Institute; Media Institute; American Spectator Foundation; International Republican Institute; American Conservative Union Foundation; Landmark Legal Foundation; Independent Institute; Free Enterprise Education Institute; Texas Public Policy Foundation; Institute for Study of Earth and Man; Independent Women's Forum; Consumer Alert; Mountain States Legal Foundation; Free Enterprise Action Institute; Regulatory Checkbook; Lindenwood University in St. Charles, Missouri; Institute for Senior Studies; Science and Environmental Policy Project;

Lexington Institute; Institute for Policy Innovation; Africa Fighting Malaria; American Friends of the Institute of Economic Affairs; Atlantic Legal Foundation; Weidenbaum Center at Washington University (formerly Center for the Study of American Business); Mackinac Center for Public Policy; Arizona State University Office of Climatology; DCI Group; and any other organizations engaged in research or advocacy concerning Climate Change or public policies, including legislation, relating to Climate Change. In Your Response to this Request, include all Communications concerning the role of each of these organizations in conducting research, studies, or reviews of Climate Change or in attempting to affect public opinions regarding Climate Change. In Your Response to this Request, include all records of payments to entities covered by this Request.

7. All Documents or Communications concerning research, advocacy, strategy, reports, studies, reviews, or public opinions regarding Climate Change sent to, received from, or about: Wallace Broecker; Taro Takahashi; Mike MacCracken; Martin Hoffert; John Christy; Richard Lindzen; Will Ollison; Joe Walker; Sallie Baliunas; Robert C. Balling, Jr.; Ross McKittrick; Wei-Hock "Willie" Soon; Patrick J. Michaels; S. Fred Singer; Roger Bate; Sherwood B. Idso; Frederick Seitz; Myron Ebell; Robert Ferguson; David R. Legates; Hugh Ellsaesser; George Taylor; Tom Synhorst; Doug Goodyear; Timothy N. Hyde; Michelle Ross; Susan Moya; A. John Adams; Alan Caudill; Candace Crandall; David Rothbard; Jeffrey Salmon; Lee Garrigan; Lynn Bouchey; Myron Ebell; Peter Cleary; Robert Gehri; Sharon Kneiss; Steven J. Milloy; Paul Driessen; and any other persons conducting research or advocacy concerning Climate Change. In Your Response to this Request, include all Communications regarding the role of each of these individuals in conducting research, studies or reviews of Climate Change or in attempting

to affect public opinions regarding Climate Change. In Your Response to this Request, include all records of payments to individuals covered by this Request.

8. All Documents or Communications concerning research, advocacy, strategy, reports, studies, reviews, or public opinions regarding Climate Change sent to or received from: James F. Black; Andrew Callegari; Roger Cohen; Edward E. David, Jr.; Brian Flannery; Edward Garvey; David Slade; Henry Shaw; N. Richard Werthamer; Harold N. Weinberg; Ed K. Wiley; Robert E. Barnum; Mike P. Margolis; Haroon Kheshgi; Randy Randol; and any other current or former employees or contractors conducting research or advocacy concerning Climate Change. In Your Response to this Request, include all Communications regarding the role of each of these individuals in conducting research, studies or reviews of Climate Change or in attempting to affect public opinions regarding Climate Change. In Your Response to this Request, include all records of payments to individuals covered by this Request.
9. All Documents or Communications concerning Your efforts to employ, fund, associate with, collaborate with, or work with any organizations, entities, associations, individuals, or groups of persons to influence public views regarding the likelihood that or extent to which carbon dioxide, methane, oil and gas extraction or use, or any of Exxon Mobil Corporation's products or activities directly or indirectly impact Climate Change. Include Documents or Communications evidencing such employment, funding, association, collaboration, or work.
10. All Documents concerning the "CO<sub>2</sub> Greenhouse" research project or any other project researching the greenhouse effects of carbon dioxide or other greenhouse gases.
11. All Documents (including drafts) sent to or received by, and all Communications with or about, public relations firms regarding Your statements concerning or strategies for addressing



Climate Change. Include in your response a list, or Documents sufficient to Identify, all public relations firms that have been retained or consulted by You or made proposals to You concerning Climate Change.

12. All Documents and Communications concerning your strategies for publicly discussing Climate Change, including but not limited to Communications to employees and spokespersons about how to discuss Climate Change.
13. All Documents and Communications concerning the following articles, their authors, their content, or their impact:
  - (a) All articles in the series "Exxon: The Road Not Taken," published by *InsideClimate News* since September 1, 2015.
  - (b) Articles published in the *Los Angeles Times* since September 1, 2015 concerning You and Climate Change
14. All Documents and Communications concerning investigations of your statements regarding Climate Change by any state attorney general, other enforcement agency, or environmental or other organization.
15. All Communications since June 1, 2015 with or about the Royal Society of the United Kingdom.
16. All Documents concerning Your budget, spending, or plans for public relations, advertising, or other advocacy relating to Climate Change.

**NOTE:** This subpoena does not require that you travel to the United States Virgin Islands or to the Department of Justice. You may comply with this Subpoena Duces Tecum by forwarding a true and correct copy of any document or other item requested, postmarked prior to the date for which production has been designated, with a signed and notarized copy of the attached

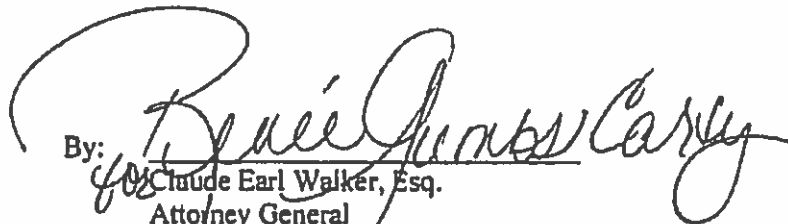
"CERTIFICATE OF CUSTODIAN OF RECORDS." Failure to appear with, or deliver the requested information, as stated above, shall be deemed a violation of 14 V.I.C. § 612 and will subject you to such sanctions and penalties as are determined by law. Failure to deliver a signed and notarized copy of the attached "CERTIFICATE OF CUSTODIAN OF RECORDS" will be considered a failure to comply with this subpoena.

WHEREFORE, I have set my hand this 15 day of March, 2016.

SUBMITTED BY:

CLAUDE EARL WALKER  
Attorney General

By:



for Claude Earl Walker, Esq.  
Attorney General  
3438 Kronprindsens Gade  
GERS Complex, 2nd Floor  
St. Thomas, U.S. Virgin Islands 00802  
(340) 774-5666

