

# **Exhibit J**

## **Document Request**

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A PROFESSIONAL CORPORATION

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November 25, 2009

**VIA FEDERAL EXPRESS**

Joseph E. Neuhaus, Esq.  
Sullivan & Cromwell, LLP  
125 Broad Street  
New York, New York 10004-2498

**Re: Miguel Calvo, et. al. v. Standard Chartered Bank, et. al.  
Claimants' First Request for Production of Documents  
to Respondents Standard Chartered Bank, Standard  
Chartered International (USA) Ltd. f/k/a American  
Express Bank Ltd., Standard Chartered Bank International  
(Americas) Limited f/k/a American Express Bank International  
and StanChart Securities International, Inc.  
(ICDR Case No.: 50 148 T 00508 09)**

Dear Mr. Neuhaus:

Claimants Miguel Calvo and/or Maria Luisa Calvo, JHC Investment Ltd, Shiva Enterprises Ltd, World Global Engineers Ltd, Primavera Internacional, Fernando Selman-Nazal, Tossa De Mar Ltd, Julio Acevedo Diaz and Maria Magdalene Commentz Salamanca, Inversiones Millapel Limitada, Maria Lucia Skinner and Horacio Undurraga, Juan Luis Eltit Z. and Patricio Eltit, Gisselle Kassis and Jorge Kassis, Asesorias Rogers Y Compania Limitada formerly known as Rogers Y Compania Limitada, Norma Narvaez, Nelson Gazali, Sergio Gazali and Yamili Atisha, Gonzalo Jaime Vega de Kuyper, Alfonso Rozas Ossa, Eliana Rodriguez, Alfonso Rozas R. and Maria Eliana Rozas R., Cecilia Irene Perez Ramirez, Ildegard Ana Kunz Parra and/or Ildegard Veronica Bustos Kunz, Arturo Murúa and Carmen Paz Daza, Hans Killinger B., Boxer Limited, Simon Echenique and Pedro Echenique, GLDN Corporation Ltd and Fujian Ltd., by their attorneys, Eiseman Levine Lehrhaupt & Kakoyiannis, P.C., Kerstein Cohen & Lichtenstein, LLP and Allamand & Schaulsohn, hereby request that Respondents Standard Chartered Bank, Standard Chartered International (USA) Ltd. f/k/a American

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Express Bank Ltd., Standard Chartered Bank International (Americas) Limited f/k/a American Express Bank International and StanChart Securities International, Inc. produce the following documents listed below within thirty (30) days from the date of service of this request for inspection and copying at the offices of Eiseman Levine Lehrhaupt & Kakoyiannis, P.C., 805 Third Avenue, 10<sup>th</sup> Floor, New York, New York 10022.

DEFINITION AND INSTRUCTIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "Claimants" shall refer to any one or more of Miguel Calvo, Maria Luisa Calvo, JHC Investment Ltd, Shiva Enterprises Ltd, World Global Engineers Ltd, Primavera Internacional, Fernando Selman-Nazal, Tossa De Mar Ltd, Julio Acevedo Diaz and Maria Magdalene Commentz Salamanca, Inversiones Millapel Limitada, Maria Lucia Skinner and Horacio Undurraga, Juan Luis Eltit Z. and Patricio Eltit, Gisselle Kassis and Jorge Kassis, Asesorias Rogers Y Compania Limitada formerly known as Rogers Y Compania Limitada, Norma Narvaez, Nelson Gazali, Sergio Gazali and Yamili Atisha, Gonzalo Jaime Vega de Kuyper, Alfonso Rozas Ossa, Eliana Rodriguez, Alfonso Rozas R. and Maria Eliana Rozas R., Cecilia Irene Perez Ramirez, Ildegard Ana Kunz Parra and/or Ildegard Veronica Bustos Kunz, Arturo Murúa and Carmen Paz Daza, Hans Killinger B., Boxer Limited, Simon Echenique and Pedro Echenique, GLDN Corporation Ltd or Fujian Ltd, and all references to Claimants shall be deemed to include (to the extent applicable) Claimants', officers, directors, partners, affiliates, subsidiaries, employees, agents or representatives, including their attorneys, or any employees, agents, investigators or representatives of their attorneys.

2. "Communication" means any oral or written statements, notes, or utterances of any nature including, without limitation, correspondence, notes, reports, conversations, dialogues, discussions, interviews, consultations, agreements, and other.

3. "Complaints" include all customer complaints (written or oral), lawsuits (including, without limitation, cases filed in state or federal court in the United States or internationally), administrative proceedings, or investigations or inquiries (formal or informal) by any governmental, quasi-governmental or self-regulatory organization, whether in the United States or internationally including without limitation, the SEC, the U.K. Financial Services Authority or any other regulatory authority.

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4. “Concerning” means relating in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, supporting or pertaining to, directly or indirectly.

5. “Documents” include any form of communication (whether words, numbers or symbols) recorded in any form, including electronically, and on audio and visual tapes, or computer drives and/or disks and along with non-identical copies of the form of communication. Documents stored on computer drives and/or disks or magnetic tapes should be either copied and produced or printed and produced in tangible form. Documents include those in any language other than English, including, without limitation, Spanish.

6. “Fairfield Sentry” refers to Fairfield Sentry Limited, an investment fund organized as an international business company under the laws of the British Virgin Islands, which invested substantially all of its assets with Madoff Securities and Bernard Madoff.

7. “Fairfield Sigma” refers to Fairfield Sigma Limited, an investment fund which invested substantially all its assets in Fairfield Sentry.

8. “FGG” refers to Fairfield Greenwich Group, and its global family of affiliated companies including, without limitations, Fairfield Greenwich Limited and its subsidiaries worldwide, including, without limitation, Fairfield Greenwich (Bermuda) Ltd., Fairfield Greenwich Advisors LLC, Fairfield Heathcliff Capital LLC, Fairfield Greenwich U.K. Limited and Lion Fairfield Capital Management Ltd.

9. “Madoff” refers to Bernard L. Madoff.

10. “Madoff Securities” refers to Bernard L. Madoff Investment Securities LLC.

11. “Private Placement Memorandum” means all Private Placement Memorandum whether final or preliminary, including amendments and supplements thereto, relating to the offering of shares of Fairfield Sentry Limited (or Fairfield Sigma) in effect during the period January 1, 2002 through October 31, 2008 including, without limitation, the Private Placement Memorandum, dated August 14, 2006, set forth as Exhibit 1 to the Statement of Claim.

12. “Respondents” shall refer to any one or more of Standard Chartered Bank, Standard Chartered International (USA) Ltd. f/k/a American Express Bank Ltd., Standard Chartered Bank International (Americas) Limited f/k/a American Express Bank International, StanChart Securities International, Inc., John G. Dutkowski or Rodolfo L.

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Pages and all references to the Respondent Standard Chartered Entities shall be deemed to include each of its officers, directors, parents, affiliates, subsidiaries, employees, agents or representatives, including their attorneys, or any employees, agents, investigators or representatives of their attorneys.

13. "Respondent Standard Chartered Entities" shall refer to any one or more of Standard Chartered Bank, Standard Chartered International (USA) Ltd. f/k/a American Express Bank Ltd., Standard Chartered Bank International (Americas) Limited f/k/a American Express Bank International or StanChart Securities International, Inc." and all references to the Respondent Standard Chartered Entities shall be deemed to include each of its officers, directors, parents, affiliates, subsidiaries, employees, agents or representatives, including their attorneys, or any employees, agents, investigators or representatives of their attorneys.

14. "Santiago Representative Office" refers to the representative office of the Respondent Standard Chartered Entities located in Santiago, Chile.

15. "Statement of Claim" refers to the Statement of Claim, dated September 17, 2009, filed by Claimants against Respondents with respect to the pending AAA-ICDR arbitration (Case No. 50 148 T 00508 09).

16. If any one of the documents referred to below were once in any possession, custody or control of the Respondent Standard Chartered Entities but are no longer in their possession, custody or control, identify such documents by stating the type of document, the date, the author, the addressee, and the reason such Respondents no longer have possession or control of such documents.

17. In the event that any document requires a computer key, computer code or other item to decode it, this request will extend to your production of any such key or code.

18. If any document is withheld on grounds of any evidentiary privilege or the work product doctrine, set forth (a) the authors and recipients of the document, (b) the date of the document, (c) the type of document (e.g. letter, memorandum, report, etc.) and the number of pages it contains, (d) the subject matter of the document, and (e) the basis on which the document is withheld from production.

19. This request should be construed as continuing in nature such that if any document that qualifies for production under this request comes into the possession, custody or control of the Respondent Standard Chartered Entities after receipt of this request, such document must be produced when it is received.

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20. In making documents available, each document to be produced should include all attachments and all enclosures referred to in the document or which were originally attached to or enclosed with the document requested to be produced.

21. In making documents available all drafts of each document requested shall be produced.

22. The singular shall be construed to include the plural and vice versa. The words "and" and "or" shall each be construed both disjunctively and conjunctively. If you are of the opinion that any document request is subject to more than one interpretation, the appropriate interpretation is the one that makes the document request most inclusive.

23. Unless otherwise specified, the applicable time period for the documents requested is from January 1, 2002 through the date of this request. All capitalized terms herein shall have the same meaning as defined in the Statement of Claim except as otherwise defined herein.

**REQUESTS FOR DOCUMENTS**

In accordance with the instructions and definitions set forth above, please produce the following documents:

1. All account documents concerning each Claimant's account with the Respondent Standard Chartered Entities beginning at such time as each Claimant established a brokerage account with the Respondent Standard Chartered Entities, including without limitation, new account forms, account opening documents, account applications, authorizations, powers of attorney, brokerage client agreements, account agreements, non-discretionary investment services agreements, pledge agreements, investor questionnaires and investment proposals containing recommended investments (or documents containing similar information).

2. All account statements (monthly or otherwise) for each Claimant's account with the Respondent Standard Chartered Entities beginning with the month in which each Claimant first purchased Fairfield Sentry (or Fairfield Sigma) through the date of this request or at such earlier time as Claimant no longer maintained an account with the Respondent Standard Chartered Entities.

3. All documents concerning communications between the Claimants and the Respondents concerning any of Claimant's accounts or Fairfield Sentry (or Fairfield Sigma) including without limitation, e-mails, faxes, memos, notes, phone logs, phone

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records, message pads, diaries, journal entries, inter-office memos and tape recordings or other recording of any kind.

4. All documents bearing the signature of any of the Claimants.
5. All customer complaints received by Respondents of a similar nature to the claims set forth in the Statement of Claim.
6. All compliance manuals and compliance procedures concerning the private banking broker-dealer business of the Respondent Standard Chartered Entities including, without limitation, procedures applicable to relationship managers, representative office procedures pertaining to the Santiago Representative Office and training manuals concerning the claims alleged in the Statement of Claim including any separate or supplemental manuals as well as any legal or compliance bulletins (or similar notices) issued by the compliance department (or similar department) of the Respondent Standard Chartered Entities and the entire table of contents and index to each such manual or procedures.
7. All documents concerning any rules, regulations, policies, procedures, guidelines or standards of the private banking broker-dealer business of the Respondent Standard Chartered Entities concerning any of the following:
  - (a) private placements, private placement memorandum and subscription agreements;
  - (b) due diligence of securities prior to making such securities available to clients and on-going due diligence concerning securities after they are made available to clients;
  - (c) the accuracy of statements made to clients with respect to investments prior to recommending such investments;
  - (d) recommendations to clients;
  - (e) suitability of recommendations; and
  - (f) the offering and sale of Fairfield Sentry (or Fairfield Sigma).
8. All documents of the Respondent Standard Chartered Entities concerning supervision and compliance of Claimants' accounts and the Fairfield Sentry (or Fairfield Sigma) investment including, without limitation, internal reviews and reports,

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supervisory logs, or any other compliance or supervisory records which reference any Claimant account or the Fairfield Sentry (or Fairfield Sigma) investment.

9. Records of disciplinary action taken against any of the Respondents or their employees, agents or representatives by any regulator, governmental entity or quasi governmental entity for conduct similar to the conduct alleged in the Statement of Claim.

10. Those portions of examination reports or similar reports following an examination or an inspection conducted by a state or federal agency or self regulatory organization that focused on the activities of any of the Respondents that discussed improper behavior similar to the improper conduct alleged in the Statement of Claim.

11. All filings made by the Respondents Standard Chartered Entities with any governmental or quasi-governmental entity or agency in Chile concerning the Santiago Representative Office.

12. All documents sufficient to identify the names of all relationship managers and all other employees of the Santiago Representative Office during the period September 1, 2005 through December 31, 2008.

13. All documents sufficient to identify the names of all relationship managers and all other employees of the Miami Office of Respondent SCBI during the period September 1, 2005 through December 31, 2008.

14. All complaints contained in employee disciplinary files and customer complaint logs or files (or similar documents by whatever name known) relating to Respondent John G. Dutkowski, Respondent Rodolfo L. Pages or any relationship managers of the Respondent Standard Chartered Entities involved in the offer or sale of Fairfield Sentry (or Fairfield Sigma) to any of Claimants.

15. All documents concerning any formal or informal investigation of the activities of the Miami office of Respondent SCBI related to any period during which any of the Claimants maintained accounts at the Respondent Standard Chartered Entities.

16. All documents filed in any court (domestic or international) by any customer of the Respondent Standard Chartered Entities asserting claims against the Respondent Standard Chartered Entities relating to Fairfield Sentry (or Fairfield Sigma).

17. All documents concerning any sanctions or fines concerning the activities of the Miami office of Respondent SCBI related to any period during which any of the Claimant's maintained accounts at the Respondent Standard Chartered Entities including,



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without limitation, the Cease and Desist Order and Order of Assessment of a Civil Money Penalty pursuant to the Federal Deposit Insurance Act, as amended (Docket No. 07-017-B-EC).

18. All documents concerning the document retention policy (or policies) for the Respondent Standard Chartered Entities concerning their private banking broker-dealer business and the Santiago Representative Office.

19. All business cards of Respondent John G. Dutkowski or other documents reflecting his title and position at the Respondent Standard Chartered Entities.

20. All Form U-4s (including amendments) for Respondent John G. Dutkowski concerning his affiliation with Respondent StanChart Securities International, Inc.

21. All resumes of Respondent John G. Dutkowski.

22. All business cards of Respondent Rodolfo L. Pages or other documents reflecting his title and position at the Respondent Standard Chartered Entities.

23. All Form U-4s (including amendments) for Respondent Rodolfo L. Pages concerning his affiliation with Respondent StanChart Securities International, Inc.

24. All resumes of Respondent Rodolfo L. Pages.

25. All business cards of Jon Iruretagoyena Olalde or other documents reflecting his title and position at the Respondent Standard Chartered Entities.

26. All documents concerning communications between the Respondent Standard Chartered Entities and any of their relationship managers employed at the Santiago Representative Office or any other employee of the Santiago Representative Office concerning any Claimant account or Fairfield Sentry (or Fairfield Sigma).

27. All documents concerning communications between and among the Respondent Standard Chartered Entities and their relationship managers or other employees, other than the relationship managers or employees employed at the Santiago Representative Office, concerning Fairfield Sentry (or Fairfield Sigma).

28. All documents concerning communications between or among the Respondents and FGG, Fairfield Sentry, Fairfield Sigma, or any of their affiliates with respect to Fairfield Sentry (or Fairfield Sigma).

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29. All Private Placement Memorandum or other offering or disclosure documents (including drafts thereof) concerning Fairfield Sentry (or Fairfield Sigma).

30. All marketing materials (including drafts thereof) concerning Fairfield Sentry (or Fairfield Sigma).

31. All documents concerning or evidencing the delivery to Claimants of the Private Placement Memorandum including, without limitation, certified receipts of delivery, mail carrier receipts of delivery, or tracking numbers.

32. All documents concerning or evidencing the delivery to Claimants of other offering or disclosure documents (besides the Private Placement Memorandum) concerning Fairfield Sentry (or Fairfield Sigma) including, without limitation, certified receipts of delivery, mail carrier receipts of delivery, or tracking numbers.

33. All documents concerning or evidencing the delivery of the Private Placement Memorandum to the Santiago Representative Office including, without limitation, certified receipts of delivery, mail carrier receipts of delivery, or tracking numbers.

34. All documents evidencing that the Private Placement Memorandum was available at the Santiago Representative Office during the period September 1, 2005 through October 31, 2008.

35. All documents evidencing that the Respondent Standard Chartered Entities directed the Relationship Managers or any other employees of the Santiago Representative Office to deliver the Private Placement Memorandum to Claimants.

36. All documents prepared or used by the Respondent Standard Chartered Entities concerning Fairfield Sentry (or Fairfield Sigma) including, without limitation, research reports, private placement memorandum or other offering documents, due diligence materials, analysis, projections and marketing materials and documents intended or identified as being "for internal use only" and worksheets or notes.

37. All documents relied upon by the Respondent Standard Chartered Entities in making recommendations to Claimants to purchase the shares of Fairfield Sentry (or Fairfield Sigma).

38. All "Fact Sheets" concerning Fairfield Sentry circulated by FGG (as referenced in paragraph 50 of the Respondent Statement of Defense of the Standard

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Chartered Entities) or talking points or other marketing material concerning Fairfield Sentry.

39. All offering documents including, without limitation, private placement memorandum, for other funds (besides Fairfield Sentry and Fairfield Sigma) which invested all or a portion of their assets with Madoff Securities or Bernard Madoff.

40. All notes and other documents concerning meetings between the Respondent Standard Chartered Entities and Claimants concerning Fairfield Sentry (or Fairfield Sigma).

41. All subscription agreements or other documents signed by any of the Claimants concerning their investment in Fairfield Sentry (or Fairfield Sigma).

42. All subscription agreements concerning an investment in Fairfield Sentry (or Fairfield Sigma) which contained any of the names of Claimants whether executed by Claimants or not.

43. All trade confirmations concerning or evidencing purchases of shares of Fairfield Sentry (or Fairfield Sigma) by Claimants.

44. All documents concerning communications between or among Fairfield Sentry, FGG and any of the Claimants concerning Fairfield Sentry (or Fairfield Sigma).

45. All documents evidencing the aggregate dollar amount of Fairfield Sentry shares offered and sold by the Respondent Standard Chartered Entities to their clients during the period beginning on the date that Fairfield Sentry was first made available to clients of the Respondent Standard Chartered Entities through December 11, 2008.

46. All documents evidencing the aggregate dollar amount of Fairfield Sigma shares offered and sold by the Respondent Standard Chartered Entities to their clients during the period beginning on the date that Fairfield Sigma was first made available to clients of the Respondent Standard Chartered Entities through December 11, 2008.

47. All documents concerning all fees charged to Claimants by the Respondent Standard Chartered Entities with respect to Claimants' investment in Fairfield Sentry (or Fairfield Sigma).

48. All documents concerning all purchases and sales of shares of Fairfield Sentry (or Fairfield Sigma) by the Respondents.

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49. All documents concerning all purchases and sales by the Respondents of shares or other securities of any of other fund (besides Fairfield Sentry and Fairfield Sigma) which invested substantially all or a portion of its assets with Madoff Securities or Bernard Madoff including, without limitation, investments by the Respondent Standard Chartered Entities in Kingate Global Fund Limited.

50. All documents concerning investments by the Respondents with Madoff Securities at any time.

51. All documents concerning a description of all investment programs (or asset allocation programs) offered by the Respondent Standard Chartered Entities as part of their private banking broker-dealer business to their clients (including Claimants) during the period January 1, 2002 through November 30, 2008.

52. All documents concerning or supporting the claim that Fairfield Sentry was a low risk investment or a "risk reducer".

53. All documents evidencing the presence of Respondent John G. Dutkowski in Chile during the period January 1, 2005 to December 11, 2008.

54. All documents evidencing the presence of Respondent Rodolfo L. Pages in Chile during the period January 1, 2005 to December 11, 2008.

55. All documents evidencing the presence in Chile of any relationship managers or other employees of Respondent SCBI's Miami Office or of any employees of the other Respondent Standard Chartered Entities (except employees of the Santiago Representative Office) during the period January 1, 2005 to December 11, 2008.

56. All documents concerning any in-person meetings between Respondent Dutkowski (or any other employee, agent or representative of the Respondent Standard Chartered Entities) and any of the Claimants.

57. All documents concerning any in-person meetings between any relationship managers of the Santiago Representative Office and Claimants.

58. All documents concerning any in-person meetings in the United States between Claimants and any relationship managers or other employee of the Miami or New York offices of the Respondents Standard Chartered Entities.

59. All documents concerning written procedures pertaining to subscription agreements for Fairfield Sentry (or Fairfield Sigma).

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60. All documents concerning redemption procedures with respect to the Fairfield Sentry (or Fairfield Sigma) investment.

61. All documents concerning communications between the Respondent Standard Chartered Entities' offices and the Santiago Representative Office concerning the Private Placement Memorandum.

62. All documents concerning any analyses of Fairfield Sentry (or Fairfield Sigma) by the Respondent Standard Chartered Entities (or by third parties on behalf of the Standard Chartered Entities) including, but not limited to, analyses concerning the split strike conversion strategy, volatility, risk, performance returns, etc.

63. All documents concerning any efforts by the Respondent Standard Chartered Entities to reverse engineer the returns of Fairfield Sentry (or Fairfield Sigma) or Madoff Securities.

64. All documents concerning the reasons for the termination of the employment of Respondent Rodolfo L. Pages with the Respondent Standard Chartered Entities in September 2009.

65. All U-5 Forms filed by Respondent StanChart Securities International Inc. concerning Respondent Rodolfo L. Pages.

66. All agreements between the Respondent Standard Chartered Entities and FGG, Fairfield Sentry, Fairfield Sigma, or any affiliates thereof, with respect to the distribution and sale of Fairfield Sentry (or Fairfield Sigma) to clients.

67. All documents concerning compensation received by the Respondent Standard Chartered Entities from FGG, Fairfield Sentry, Fairfield Sigma, (or any affiliated entity thereof) with respect to the distribution and sale of Fairfield Sentry (or Fairfield Sigma) to clients.

68. All documents concerning due diligence conducted by the Respondent Standard Chartered Entities, or by third parties on behalf of the Respondent Standard Chartered Entities, with respect to Fairfield Sentry (or Fairfield Sigma).

69. All documents concerning due diligence conducted by Respondent SCBI, formerly known as American Express Bank, of Fairfield Sentry (or Fairfield Sigma) prior to first making Fairfield Sentry available to its clients.

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70. All documents concerning due diligence conducted by the Respondent Standard Chartered Entities of Fairfield Sentry (or Fairfield Sigma) during the period after first making Fairfield Sentry (or Fairfield Sigma) available to its clients and continuing until December 11, 2008.

71. All documents concerning communications among the Respondent Standard Chartered Entities or any of their employees, representatives or agents concerning Fairfield Sentry (or Fairfield Sigma) during the period January 1, 2002 to date.

72. All documents supporting the statement by Morteza Farzaneh, Global Head of Relationship Management of the Standard Chartered Private Bank, that "AEB [American Express Bank] performed appropriate due diligence on the Fairfield Sentry and Fairfield Sigma funds before making the funds available to its clients" as set forth in his letter, dated February 19, 2009, to clients (including Claimants) of the Standard Chartered Private Bank.

73. All documents supporting the statement by Morteza Farzaneh, Global Head of Relationship Management of the Standard Chartered Private Bank, as set forth in his letter, dated February 19, 2009 to clients of the Standard Chartered Private Bank, that due diligence of the Fairfield Sentry and Fairfield Sigma funds was "revalidated periodically in subsequent years".

74. All documents concerning due diligence conducted by the Respondent Standard Chartered Entities with respect to Madoff Securities or Madoff.

75. All documents concerning due diligence conducted by FGG (including its affiliates) of Fairfield Sentry, Madoff Securities or Madoff.

76. All documents concerning due diligence with respect to Madoff Securities or Madoff conducted by third parties on behalf of the Respondent Standard Chartered Entities.

77. All documents concerning the split-strike conversion strategy as disclosed in the Private Placement Memorandum.

78. All documents concerning communications between American Express employees and FGG concerning Fairfield Sentry as referenced in paragraph 32 of the Statement of Defense of the Respondent Standard Chartered Entities.

79. All documents received by American Express entities from FGG concerning Fairfield Sentry, other FGG funds, Madoff Securities or Madoff including, without

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limitation, risk and exposure reports and other information relating to Fairfield Sentry (or Fairfield Sigma) and other FGG funds as referenced in paragraph 32 of the Statement of Defense of the Respondent Standard Chartered Entities.

80. The Confidentiality Agreement between one or more American Express entities and FGG (and/or its affiliates) referenced in paragraph 32 of the Statement of Defense of the Respondent Standard Chartered Entities.

81. All documents concerning “front-running” by Madoff Securities and Madoff including without limitation, a legal opinion received by FGG (or its affiliates) concerning liability for “front-running” by Madoff Securities or Madoff.

82. All minutes of meetings of the Board of Directors, or committees thereof, of the Respondent Standard Chartered Entities at which Fairfield Sentry, Fairfield Sigma, Madoff Securities or Madoff was discussed.

83. All minutes of meetings of the American Express Bank Asset Allocation Committee (or similar committee with responsibility of approving all investment products before they are made available to clients) at which Fairfield Sentry, Fairfield Sigma, Madoff Securities or Madoff was discussed.

84. All minutes of meetings of the American Express Bank Asset Allocation Committee (or similar committee with responsibility of approving products before they are made available to clients) at which other funds which invested substantially all or a portion of their assets with Madoff Securities or Madoff were discussed.

85. All documents concerning communications between the Respondent Standard Chartered Entities and Madoff Securities (including any employees, agents or representatives thereof) or Madoff.

86. All documents, including notes, concerning meetings between any personnel of the Respondent Standard Chartered Entities and Madoff including, without limitation, the meeting of April 2008 as referenced in paragraph 33 of the Statement of Defense of the Standard Chartered Entities.

87. All documents concerning communications between any personnel of the Respondent Standard Chartered Entities and Madoff or any employees of Madoff prior to or after the meeting in April 2008 as referenced in paragraph 33 of the Statement of Defense of the Standard Chartered Entities.

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88. All documents concerning communications between any personnel of the Respondent Standard Chartered Entities and FGG or Fairfield Sentry (or affiliates thereof) prior to or after the meeting of Standard Chartered personnel and Madoff in April 2008 as referenced in paragraph 33 of the Statement of Defense of the Standard Chartered Entities.

89. All documents concerning or evidencing knowledge prior to December 11, 2008 by the Respondents of SEC investigations of Madoff Securities or Madoff including, but not limited to, the SEC investigations referred to in paragraphs 39, 40, 41 and 42 of the Statement of Defense of the Respondent Standard Chartered Entities.

90. All documents concerning communications between or among Fairfield Sentry, FGG and its affiliates, and Madoff Securities or Madoff.

91. All documents concerning meetings or communications beginning in 2002 between senior employees of American Express entities and FGG representatives concerning Fairfield Sentry's investment strategy and its operations as disclosed in paragraph 28 of the Statement of Defense of the Respondent Standard Chartered Entities.

92. All documents received by senior employees of one or more American Express entities during all meetings with FGG representatives to discuss Fairfield Sentry's investment strategy and its operations including, without limitation, a due diligence questionnaire prepared by FGG concerning Fairfield Sentry entitled the "Hedge Fund Manager Due Diligence Questionnaire" and all audited financial statements of Fairfield Sentry as referenced in paragraph 28 of the Statement of Defense of the Respondent Standard Chartered Entities.

93. All documents concerning procedures of the Respondent Standard Chartered Entities, or committees thereof including, without limitation, those procedures of the American Express Bank Asset Allocation Committee (or similar committee with responsibility of approving all investment products before they are made available to clients) concerning consideration of approval of investment products before they are first made available to clients.

94. All documents relied upon by the American Express Bank Asset Allocation Committee (or a similar committee with responsibility for approving all investment products before they are made available to clients) in approving Fairfield Sentry (or Fairfield Sigma) for sale to clients.

95. All documents sufficient to identify the names of all securities included in the alternative investment asset class (including Fairfield Sentry and Fairfield Sigma)



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approved for sale to clients of the Respondent Standard Chartered Entities during the period September 1, 2005 through October 31, 2008.

96. All documents concerning guidelines for the split strike conversion strategy implemented by Madoff Securities for Fairfield Sentry as disclosed on pages 9 and 10 of the Private Placement Memorandum attached as Exhibit A to the Statement of Claim.

97. All documents concerning the performance of Fairfield Sentry since inception (1990).

98. All documents concerning the performance of Fairfield Sigma since inception of such fund.

99. All documents evidencing that Fairfield Greenwich (Bermuda) Ltd. or its affiliates, conducted a detailed manager selection and due diligence process with respect to Madoff Securities and Madoff prior to selection as the exclusive third party investment manager for Fairfield Sentry as disclosed in the Private Placement Memorandum, Appendix A, Item 4c.(7) attached as Exhibit A to the Statement of Claim.

100. All documents evidencing pre and post investment quantitative analyses of Madoff Securities conducted by Fairfield Risk Services, Ltd. on behalf of Fairfield Sentry as disclosed in the Private Placement Memorandum, Appendix A, Items 4.A(5) and 4.B(8).

101. All financial statements of Madoff Securities including audited financial statements, unaudited financial statements or any other financial statements.

102. All FGG marketing material including, without limitation, "FGG – the Firm and Its Capabilities (September 2008) and "FGG – Due Diligence and Risk Monitoring".

103. All documents evidencing that FGG (or its affiliates) reviewed internal controls of Madoff Securities in the areas of portfolio management, conflicts of interest, segregation of duties, and compliance and assessed whether Madoff Securities complied with its own controls and procedures.

104. All documents evidencing that FGG, or its affiliates, reviewed Madoff Securities' financial statements, accounting controls, trade execution and trade reconciliation and bank reconciliations for irregular or outstanding items and broker reconciliations to ensure completeness and existence of all securities.

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105. All documents concerning interviews by any employees of the Respondent Standard Chartered Entities of FGG's Bermuda based risk management team with respect to review of Madoff's daily trading records as referenced in paragraph 29 of the Statement Defense of the Respondent Standard Chartered Entities.

106. All documents concerning trading by Madoff Securities on behalf of Fairfield Sentry including, without limitation, all account statements (monthly or otherwise) of Fairfield Sentry.

107. All documents of FGG's Bermuda based risk management team concerning trading activity of Madoff Securities.

108. All documents evidencing the amount of fees paid by Fairfield Sentry to FGG or its affiliates including, without limitation, management fees and performance fees during the period January 1, 2002 through November 30, 2008.

109. All documents evidencing the amount of assets of Fairfield Sentry invested with Madoff Securities during the years 2002-2008.

110. All documents evidencing that any officer, director or employee of the Respondents Standard Chartered Entities (including the members of the American Express Bank Asset Allocation Committee or similar committee with responsibility for approving all investment products before they are made available to clients) reviewed publicly available information concerning Madoff Securities and Bernard Madoff prior to first making Fairfield Sentry (or Fairfield Sigma) available to its clients.

111. All documents evidencing whether or not any executive officer or director of the Respondent Standard Chartered Entities (or any members of the American Express Bank Asset Allocation Committee or any similar committee with responsibility to approve investment products before they are made available to clients) had read any publications concerning Madoff or Madoff Securities including, without limitation, the May 2001 article in Barrons entitled "Don't Ask, Don't Tell: Bernie Madoff Is So Secretive, He Even Asks Investors To Keep Mum" or the May 2001 article in MAR/Hedge entitled "Madoff Tops Charts: Skeptics Ask How" prior to making Fairfield Sentry (or Fairfield Sigma) available to clients or at any time thereafter.

112. All documents concerning subscriptions to Barrons or MAR/Hedge in May 2001 by any executive officer or director of the Respondent Standard Chartered Entities or any members (at any time) of the American Express Bank Asset Allocation Committee (or similar committee with responsibility to approve investment products before they are made available to clients).

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113. All documents regarding any concerns, problems or “red flags” discovered by the Respondent Standard Chartered Entities during the course of their due diligence (or due diligence by third parties on their behalf) conducted prior to first making Fairfield Sentry available to their clients and subsequent thereto through December 10, 2008 as part of Respondents' ongoing due diligence of Fairfield Sentry.

114. All documents evidencing the name of the accounting firm for Madoff Securities.

115. All documents concerning the performance returns of other funds (beside Fairfield Sentry) that utilized a split-strike conversion strategy.

116. All documents concerning communications between the Respondent Standard Chartered Entities and clients (including Claimants) with respect to the transfer of brokerage accounts from Respondent SCBI to Respondent StanChart Securities International, Inc.

117. All communications between the Respondent Standard Chartered Entities and Claimants concerning Respondent StanChart Securities International, Inc.

118. All monthly or other reports from Fairfield Greenwich Group (or affiliates) concerning the performance of Fairfield Sentry (or Fairfield Sigma).

119. All documents concerning or evidencing the delivery to Claimants of the letter, dated October 1, 2008, from Fernando Iglesia, Chief Operating Officer of the Standard Chartered Private Bank, concerning the transfer of brokerage accounts to Respondent StanChart Securities International, Inc.

120. All documents concerning or evidencing the delivery to Claimants of the letter, dated November 7, 2008, from Fernando Iglesia, Chief Operating Officer of the Standard Chartered Private Bank, concerning the transfer of accounts to Respondent StanChart Securities, Inc.

121. All documents concerning or evidencing the delivery to Claimants of the letter, dated March 1, 2009, from Jay Castello, Chief Operating Officer of Respondent StanChart Securities International, Inc., including delivery of the StanChart Securities International, Inc. Brokerage Client Agreement as an attachment to such letter.

122. All letters from FGG or Fairfield Sentry to shareholders of Fairfield Sentry.

123. All ADV forms concerning Madoff Securities.

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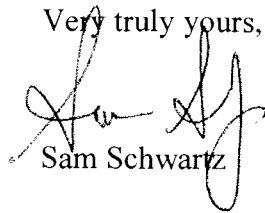
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124. All 13F forms concerning Madoff Securities.

125. All documents concerning the establishment and the activities of the “Internal Task Force comprised of senior executives of the Respondent Standard Chartered Entities” subsequent to the arrest of Bernard Madoff as referenced in the letter (undated) of Peter Flavel, Global Head, the Standard Chartered Private Bank.

126. All documents concerning the work of outside experts engaged by the Respondent Standard Chartered Entities after the arrest of Bernard Madoff as referenced in the letter (undated) of Peter Flavel, Global Head of the Standard Chartered Private Bank.

Very truly yours,



Sam Schwartz

cc: Ricardo Gonzalez, Esq.  
Carolina Cardenas  
Geoffrey Lewis, Esq.  
Jorge Schaulsohn, Esq.