

# **EXHIBIT F**




American Arbitration Association  
Dispute Resolution Services Worldwide

International Dispute Resolution Procedures **ARBITRATION RULES**  
(ENTER THE NAME OF THE APPLICABLE RULES)

**Demand for Arbitration**

**MEDIATION:** If you would like the AAA to contact the other parties and attempt to arrange mediation, please check this box.   
There is no additional administrative fee for this service.

Name of Respondent <b>Richard P. Nordan</b>			Name of Representative (if known) <b>David F. Kirby</b>		
Address: <b>3605 Glenwood Avenue, Suite 240</b>			Name of Firm (if applicable): <b>Kirby &amp; Holt, LLP</b>		
			Representative's Address <b>3201 Glenwood Avenue, Suite 100</b>		
City <b>Raleigh</b>	State <b>NC</b>	Zip Code <b>27612</b>	City <b>Raleigh</b>	State <b>NC</b>	Zip Code <b>27612</b>
Phone No. <b>919.782.9322</b>		Fax No. <b>919.782.8113</b>	Phone No. <b>919.881.2111</b>		Fax No. <b>919.781.8630</b>
Email Address: <b>mordan@wnslaw.com</b>			Email Address: <b>dkirby@kirby-holt.com</b>		
The named claimant, a party to an arbitration agreement dated <u>various</u> , which provides for arbitration under the <u>unspecified</u> Arbitration Rules of the American Arbitration Association, hereby demands arbitration.					
THE NATURE OF THE DISPUTE Breach of contract: As administrator of the estates of four Blackwater professionals killed by a mob of insurgents on 3/31/04 in Fallujah, Iraq, Respondent has breached decedents' contractual obligations not to sue, not to seek publicity and to protect classified and confidential information, to release Blackwater & all affiliates from all claims, and to assume all risks of "being shot, . . . killed by a firearm . . . terrorist activity, hand to hand combat" etc. in Iraq. In order to safeguard both its own confidential information as well as sensitive information implicating the interest of the United States at war, Blackwater is filing its Memorandum in Support of this Demand under Article 34 of the above Rules ("Confidential").					
Dollar Amount of Claim \$ <b>10,000,000.00</b>			Other Relief Sought: <input checked="" type="checkbox"/> Attorneys Fees <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Arbitration Costs <input type="checkbox"/> Punitive/ Exemplary <input type="checkbox"/> Other _____		
AMOUNT OF FILING FEE ENCLOSED WITH THIS DEMAND (please refer to the fee schedule in the rules for the appropriate fee) \$ <b>14,000.00</b>					
PLEASE DESCRIBE APPROPRIATE QUALIFICATIONS FOR ARBITRATOR(S) TO BE APPOINTED TO HEAR THIS DISPUTE: The three (3) arbitrators should be knowledgeable in both military and government contract law, preferably with personal battlefield experience.					
Hearing locale <u>Currituck County, N.C.</u> (check one) <input checked="" type="checkbox"/> Requested by Claimant <input checked="" type="checkbox"/> Locale provision included in the contract					
Estimated time needed for hearings overall: <u>7</u> hours or <u>0</u> days			Type of Business: Claimant <input type="checkbox"/> Contractor supporting U.S. Armed Forces & other U.S. Government clients in war zones Respondent <input type="checkbox"/> Legal Representative of Deceased Private Security Professionals		
Is this a dispute between a business and a consumer? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Does this dispute arise out of an employment relationship? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If this dispute arises out of an employment relationship, what was/is the employee's annual wage range? Note: This question is required by California law. <input type="checkbox"/> Less than \$100,000 <input type="checkbox"/> \$100,000 - \$250,000 <input type="checkbox"/> Over \$250,000					
You are hereby notified that copies of our arbitration agreement and this demand are being filed with the American Arbitration Association's Case Management Center, located in (check one) <input type="checkbox"/> Atlanta, GA <input type="checkbox"/> Dallas, TX <input type="checkbox"/> East Providence, RI <input type="checkbox"/> Fresno, CA <input checked="" type="checkbox"/> International Centre, NY, with a request that it commence administration of the arbitration. Under the rules, you may file an answering statement within the timeframe specified in the rules, after notice from the AAA.					
Signature (may be signed by a representative)  Date: <u>12/14/06</u>			Name of Representative <b>Michael P. Socarras LLP</b>		
Name of Claimant <b>Blackwater Security Consulting, LLC</b>			Name of Firm (if applicable) <b>McDermott Will &amp; Emery</b>		
Address (to be used in connection with this case): <b>P.O. Box 1029</b>			Representative's Address: <b>600 Thirteenth Street, N.W.</b>		
City <b>Moyock</b>	State <b>NC</b>	Zip Code <b>27958</b>	City <b>Washington</b>	State <b>DC</b>	Zip Code <b>20006</b>
Phone No. <b>252.435.2488</b>		Fax No. <b>252.435.6388</b>	Phone No. <b>202.756.8110</b>		Fax No. <b>202.756.8087</b>
Email Address: <b>handrew@blackwaterusa.com</b>			Email Address: <b>msocarras@mwe.com</b>		
To begin proceedings, please send two copies of this Demand and the Arbitration Agreement, along with the filing fee as provided for in the Rules, to the AAA. Send the original Demand to the Respondent.					
Please visit our website at <a href="http://www.adr.org">www.adr.org</a> if you would like to file this case online. AAA Customer Service can be reached at 800-778-7879					