

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR

NEW YORK, NEW YORK 10017

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: BBRAFMAN@BRAFLAW.COM

BENJAMIN BRAFMAN

ANDREA ZELLAN

JOSHUA D. KIRSHNER

JACOB KAPLAN

ALEX SPIRO

MARK M. BAKER
OF COUNSEL

MARC AGNIFILO
OF COUNSEL
ADMITTED IN N.Y. AND N.J.

May 22, 2017

VIA ECF

Honorable Richard M. Berman
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

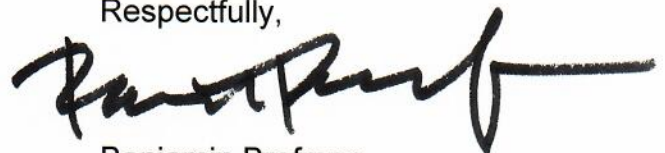
**RE: UNITED STATES V. REZA ZARRAB, ET AL.,
S3 15 Cr. 867 (RMB)**

Dear Judge Berman:

In compliance with your Honor's Order, I submit the additional Affidavits from Messrs. Giuliani and Mukasey, which are responsive to the Court's follow-up questions relating to the continuing Curcio hearing as to Mr. Zarrab.

While I have no personal information to add to the facts outlined in the attached Affidavits, I am authorized by Mr. Zarrab to respectfully inform the Court that to the extent any actual or potential conflicts arise as a result of the matters addressed therein, Mr. Zarrab is prepared to knowingly waive any such conflicts and will so advise your Honor when the hearing continues on Thursday May 25th at 9:30am.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ben Brafman', with a long horizontal flourish extending to the right.

Benjamin Brafman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
UNITED STATES OF AMERICA,	:	
	:	
Government,	:	
	:	
-v-	:	S3 15 Cr. 867 (RMB)
	:	
REZA ZARRAB, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----	X	

AFFIDAVIT OF MICHAEL B. MUKASEY

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)


Michael B. Mukasey, being duly sworn, says:

1. I am a lawyer admitted to practice in the courts of the State of New York and several federal courts, including the U.S. District Court for the Southern District of New York, and am of counsel to Debevoise & Plimpton ("Debevoise") in that firm's New York office.

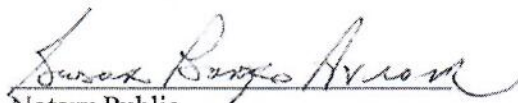
2. I make this affidavit in response to the Court's docket entry of May 12, 2017, that appears to direct defense counsel for Reza Zarrab in the captioned case to provide, as to me, information as to whether I or Debevoise has represented Turkey, Iran, Halkbank or the United States.

3. My affidavit of May 3, 2017, has already provided information as to representation of the United States, although a correction is necessary because Debevoise

represents the Department of Energy in matters involving corporate finance rather than in matters involving litigation. There has been no representation by me or Debevoise of Turkey, Iran or Halkbank.


Michael B. Mukasey

Sworn to before me this 19th day
of May, 2017


Notary Public

SUSAN BANGE AVRAM
NOTARY PUBLIC, State of New York
No. 30-4700514
Qualified in Nassau County
Certificate Filed in New York County
Commission Expires July 31, 2012

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

Government,

§3 15 Cr. 867(RMB)

-v-

REZA ZARRAB, *et al.*,

Defendants.
-----X

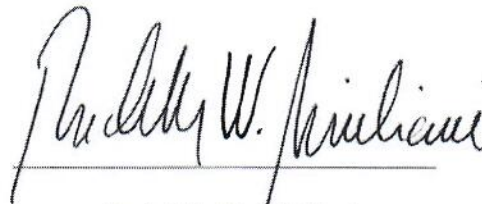
AFFIDAVIT OF RUDOLPH W. GIULIANI

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Rudolph W. Giuliani being duly sworn, says:

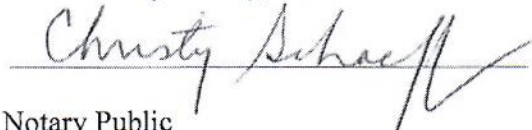
1. I am a lawyer admitted to practice in the courts of the State of New York and several federal courts, including the U.S. District Court for the Southern District of New York, and am a Shareholder with Greenberg Traurig, LLP.
2. I make this affidavit in response to the Court's Order on May 11, 2017 directing defense counsel for Reza Zarrab in the captioned case, to advise the court if I or my firm is representing Halbank or Iran and various other questions.
3. Neither I, nor my firm, have represented Iran or Halbank, nor have we during the pendency of my representation of Mr. Zarrab. A computer review of firm records by counsel's office did confirm that neither the Firm nor I have represented Halbank or Iran.
4. As previously stated, Mr. Zarrab is our client and our only client in this matter; neither Mr. Levy nor I represent the interests of Turkey or the United States. Our attorney-client obligations are exclusively to Mr. Zarrab.
5. At all times that I has had any substantive conversation with a representative of the United States government or the government of Turkey, Mr. Mukasey has fully participated, and that practice will continue as long as we continue to represent Mr. Zarrab. As such, even if the Court were to imply a conflict with regard to me and my firm's ethically screened off representation of Turkey, Mr. Mukasey's presence ensures Mr. Zabbar always has conflict free counsel fully participating and protecting his interests.

6. Neither I nor my firm has represented the Trump Administration. In particular I have not served on any Trump administration Commission "relating to the so-called Muslim Ban Executive Orders." For clarity, I have not participated in writing any of the Executive Orders on that subject issued by the Trump Administration.
7. With regard to cyber security, I am leading a group of experts from the private sector that will provide information regarding their experiences with cyber-attacks, vulnerabilities, and solutions identified by the private sector. This is a non-deliberative body charged with sharing information with the President and Administration officials in a direct and unfiltered manner regarding private sector experiences and expertise. It is not an official agency or commission of the government, it does not have any government funding or staffing.
8. In representing Mr. Zarab any conversations Mr. Mukasey or I have had or may have to further his interests as a defendant before this Court are surely within the work product privilege applicable to attorneys. Interviewing witnesses, gathering information, or otherwise discussing matters in furtherance of our client's defense are matters uniquely within our role as criminal defense attorneys that must be protected as work product at the very least.



Rudolph W. Giuliani

Sworn to before me
this 22nd day of May, 2017



Notary Public

CHRISTY SCHAEFFER
NOTARY PUBLIC, STATE OF NEW YORK
NO. 31-4769958
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES AUG 31, 2018