

**Knutte, Caitlin**

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**From:** wendy abrams [REDACTED]  
**Sent:** Monday, February 29, 2016 1:16 PM  
**To:** Ali, Khadija  
**Subject:** Re: background information

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you.  
I spoke with the lawyer in Boston, Matt Pawa, who I would like to have join us at the meeting. He is available the week of Mar 7th, Mar 15-16, or early in April. Please let me know what works on your end (perhaps if there are a couple of options, that would be great.)

I really appreciate your help!

best,  
Wendy

On Feb 29, 2016, at 12:23 PM, Ali, Khadija <[kali@atg.state.il.us](mailto:kali@atg.state.il.us)> wrote:

Hello Wendy,

Thank you for passing along this information. We'll be in touch as soon as we can regarding your meeting request.

Regards,  
Khadija

Khadija Ali  
Deputy Scheduling Director  
Office of Illinois Attorney General Lisa Madigan

**From:** wendy abrams [mailto:[REDACTED]]  
**Sent:** Friday, February 26, 2016 6:07 PM  
**To:** Ali, Khadija  
**Subject:** background information

Kali  
Nice to speak with you this afternoon. As I mentioned, I would like to meet with Attorney General Madigan to discuss ExxonMobil's practices and if the IL AG office would be interested in investigating the matter. Below is a brief description from a New York Times article of the NY AG's investigation; and a letter from Matt Pawa outlining the issues.

Please let me know if there is a time in March or early April that would be convenient for the Attorney General to meet.

Best regards,  
Wendy Abrams

NYT, Nov 5, 2015:

The New York attorney general has begun an investigation of Exxon Mobil to determine whether the company lied to the public about the risks of climate change or to investors about how such risks might hurt the oil business.

According to people with knowledge of the investigation, Attorney General Eric T. Schneiderman issued a subpoena Wednesday evening to Exxon Mobil, demanding extensive financial records, emails and other documents.

The investigation focuses on whether statements the company made to investors about climate risks as recently as this year were consistent with the company's own long-running scientific research.

The people said the inquiry would include a period of at least a decade during which Exxon Mobil funded outside groups that sought to undermine climate science, even as its in-house scientists were outlining the potential consequences — and uncertainties — to company executives.

Re: Violation of Illinois Consumer Fraud and Deceptive Business Practices Act by ExxonMobil Corp.

Dear General Madigan:

I write to bring to your attention the issue of whether ExxonMobil may have violated the Illinois Consumer Fraud and Deceptive Business Practices Act and to request a meeting with you. By way of background, I have worked closely with attorney general for many years. I represent New Hampshire, Vermont and Rhode Island in MTBE groundwater contamination cases and have worked as co-counsel with attorneys general on a series of environmental cases, including cases dealing with climate change.

Two news organizations recently disclosed internal Exxon documents demonstrating that Exxon was aware of the key pieces of information about global warming in the late 1970s and early 80s. For example, internal Exxon documents disclosed by *Inside Climate News* show that Exxon knew that:

- the use of its core product — fossil fuel — was causing the level of carbon dioxide in the atmosphere to rise;
- “a clear scientific consensus has emerged regarding the expected climatic effects of increased atmospheric CO<sub>2</sub>,” namely, that doubling atmospheric CO<sub>2</sub> would cause a planetary warming of approximately 3 degrees Celsius;

- there was “unanimous agreement in the scientific community that a temperature increase of this magnitude would bring about significant changes in the earth’s climate”; and
- “the present trend of fossil fuel consumption will cause dramatic environmental effects before the year 2050,” and it was “distinctly possible” the effects “will indeed be catastrophic (at least for a substantial fraction of the earth’s population).”

In light of this threat to the planet, Exxon’s in-house science team informed corporate management in 1977 that “the use of fossil fuels” “should not be encouraged” and warned that “man can afford 5-10 yr. time window to establish what must be done.”

In addition, the *Los Angeles Times* revealed that Exxon, among other things, has relied on global climate models since the 1980s in order to project future warming so that it could protect its own business assets, such as pipelines and offshore platforms located in the Arctic. These are the same models that Exxon spent the next decades publicly seeking to discredit as unreliable.

Exxon’s long campaign of deception and denial on global warming has been repeatedly documented through glimpses of information that have occasionally become public.<sup>11</sup> Exxon has made false, misleading and deceptive statements directly and through extensive funding of third parties, such as organizations that have held themselves out as think tanks but in fact have turned out to be secretly paid industry mouthpieces. Exxon’s long pattern of false and misleading statements on global warming has, on its face, been aimed in substantial part at trying to convince consumers that its products, i.e., fossil fuels, were and are safe for the climate; this pattern continues to this day. Now, however, we have a glimpse into Exxon’s own scientific analysis showing that it has known the key facts about global warming for the entire time it has engaged in this campaign of deception. I enclose a recent article by author and leader of [350.org](http://www.350.org) Bill McKibben on this matter. [http://www.tomdispatch.com/blog/176105/tomgram%3A\\_bill\\_mckibben\\_it's\\_not\\_just\\_what\\_exxon\\_did\\_it's\\_what\\_it's\\_doing/](http://www.tomdispatch.com/blog/176105/tomgram%3A_bill_mckibben_it's_not_just_what_exxon_did_it's_what_it's_doing/)

I would like to bring to this meeting Attorney Matt Pawa of Pawa Law Group, P.C., Sharon Eubanks of Bordas & Bordas and an attorney from Hagens, Berman Sobol Shapiro LLP. Attorney Pawa has represented several states in environmental cases and has been a pioneer on global warming legal theories for fifteen years. Ms. Eubanks, who formerly led the U.S. Department of Justice litigation against tobacco companies under the federal RICO statute; she is now in private practice. Steve Berman of Hagens Berman represented 13 states in the tobacco litigation. These lawyers are focused on assisting states in investigating whether Exxon has violated consumer fraud statutes and in particular on the possibility of obtaining injunctive relief similar to the federal RICO injunction, e.g., requiring Exxon to disclose all of its documents on this matter, prohibiting further deceptive statements and requiring the issuance of corrective statements.

These law firms have undertaken a preliminary review of the Illinois Consumer Fraud and Deceptive Business Practices Act by ExxonMobil Corp. and believe that this matter warrants your consideration. We request an opportunity to meet with you and your staff in order to provide you with a presentation on Exxon’s early knowledge of climate change and its subsequent campaign of deception and denial.

Thank you for your attention and consideration.

**Knutte, Caitlin**

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**From:** Ali, Khadija  
**Sent:** Thursday, March 03, 2016 9:45 AM  
**To:** 'wendy abrams'  
**Cc:** Ryan, Patrick  
**Subject:** RE: chicago

Hi Wendy,

Thank you for the note and for passing along the dates. I don't have a scheduling update for you as yet, but as soon as I do, I will be in touch. Thanks for your understanding.

Best,  
Khadija

**From:** wendy abrams [mailto: ]  
**Sent:** Thursday, March 03, 2016 9:42 AM  
**To:** Ali, Khadija  
**Subject:** Fwd: chicago

Obviously, we will work around your scheduling, but if it happens that either of these dates work, that would be great. (Mar 21 would need to be afternoon)  
Again, thank you for your assistance, and sorry to be the high maintenance friend!

best  
w

Begin forwarded message:

**From:** Matt Pawa <mp@pawalaw.com>  
**Subject:** chicago  
**Date:** March 3, 2016 at 9:22:33 AM CST  
**To:** wendy abrams [ ]

Wendy - I need to be in the midwest either March 21 or 22. I could combine this with a trip to Chicago (in fact I may be flying through Chicago anyway). If this works out for AG office and your sched that would work nicely on my end.

Matt Pawa  
Pawa Law Group, P.C.  
1280 Centre Street, Suite 230  
Newton Centre, MA 02459  
(617) 641-9550 x202  
(617) 641-9551 facsimile  
<http://pawalaw.com/>

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**Knutte, Caitlin**

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**From:** wendy abrams [REDACTED]  
**Sent:** Friday, March 18, 2016 12:14 PM  
**To:** Ali, Khadija  
**Subject:** Re: Mar 21

Thank you.  
Yes, it is just Matt and me.

> On Mar 18, 2016, at 12:10 PM, Ali, Khadija <[kali@atg.state.il.us](mailto:kali@atg.state.il.us)> wrote:

>  
> Hi Wendy,  
>  
> Just confirming your meeting with members of our staff for Monday, March 21st at 3:30pm here at the Thompson Center, 12th Fl. Is anyone else joining you and Mr. Pawa? When you arrive, just let someone at the front desk know that you're here for a meeting with OAG staff and they can alert me.  
>  
> Attendees from our office:  
> Ann Spillane, Chief of Staff  
> Cara Hendrickson, Division Chief, Public Interest Matt Dunn, Division  
> Chief, Environmental  
> James Gignac, Environmental and Energy Counsel  
>  
> Our IT folks will have a projector and laptop set up in advance so if Mr. Pawa has his PowerPoint on a flash drive, he can just plug that in so he doesn't have to worry about hooking up anything. Does that sound ok for him?  
>  
> Thanks!  
>  
> Best,  
> Khadija

> -----Original Message-----

> From: Wendy [mailto:[REDACTED]]  
> Sent: Thursday, March 17, 2016 9:22 AM  
> To: Ali, Khadija  
> Subject: Re: Mar 21

> Wonderful. Thank you!

> Sent from my iPhone

>> On Mar 17, 2016, at 9:09 AM, Ali, Khadija <[kali@atg.state.il.us](mailto:kali@atg.state.il.us)> wrote:

>>  
>> Hi Wendy,

>> Our office can provide a projector and there's a wall to project the PowerPoint on it. Please let me know if that is fine.

>>

>> Thanks,

>> Khadija

>>

>> -----Original Message-----

>> From: Wendy [mailto: ]

>> Sent: Wednesday, March 16, 2016 2:27 PM

>> To: Ali, Khadija

>> Subject: Re: Mar 21

>>

>> Thank you!

>>

>> Sent from my iPhone

>>

>>> On Mar 16, 2016, at 2:14 PM, Ali, Khadija <kali@atg.state.il.us> wrote:

>>>

>>> Hi Wendy,

>>>

>>> 3:30pm works for staff. I have passed along the request for a projector/screen, so I'll keep you posted.

>>>

>>> Thanks,

>>> Khadija

>>>

>>> -----Original Message-----

>>> From: wendy abrams [mailto: ]

>>> Sent: Tuesday, March 15, 2016 11:23 PM

>>> To: Ali, Khadija

>>> Subject: Re: Mar 21

>>>

>>> Thank you.

>>> Matt emailed me and asked if you have a projector and screen for a powerpoint presentation. Also, he is scheduled to land at 2, so we should be ok at 3 pm, if you have the flexibility to schedule us at 3:30, that may be better to just give us a little bit of padding in case of a flight delay, again, let me know.

>>>

>>> again, thank you

>>>

>>>> On Mar 15, 2016, at 10:57 AM, Ali, Khadija <kali@atg.state.il.us> wrote:

>>>>

>>>> Hi Wendy,

>>>>

>>>> 3pmCST on March 21st works for the OAG staff here at the Thompson Center in Chicago. If there is anyone else attending besides you and Matt, if you can let me know at your convenience, that would be great.

>>>>

>>>> Thanks,

>>>> Khadija

>>>>

>>>> -----Original Message-----

>>>> From: wendy abrams [mailto: ]

>>>> Sent: Monday, March 14, 2016 10:30 PM

>>>> To: Ali, Khadija

>>>> Subject: Mar 21

>>>>



>>>> I don't know if I emailed you last week, Matt had asked if we could meet at 3 pm, he didn't think he could get to town earlier. Let me know if that works on your end.

>>>>

>>>> thank you!

>>>> Wendy

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**Knutte, Caitlin**

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**From:** wendy Abrams [REDACTED]  
**Sent:** Tuesday, March 29, 2016 4:32 PM  
**To:** Hendrickson, Cara; Spillane, Ann M.  
**Subject:** Fwd: NYTimes: New York Climate Change Inquiry Into Exxon Adds Prosecutors

Nice to see momentum building!

Sent from my iPhone

Begin forwarded message:

**From:** "Abrams, Jim" <[JAbrams@medline.com](mailto:JAbrams@medline.com)>  
**Date:** March 29, 2016 at 3:10:23 PM MDT  
**To:** Wendy Abrams [REDACTED]  
**Subject:** NYTimes: New York Climate Change Inquiry Into Exxon Adds Prosecutors

<http://www.nytimes.com/2016/03/30/science/new-york-climate-change-inquiry-into-exxon-adds-prosecutors.html?smprod=nytcore-iphone&smid=nytcore-iphone-share>

A group of attorneys general announced support for an investigation by Eric Schneiderman of New York into Exxon Mobil's statements on global warming.

Sent from my iPhone