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May 4, 2009

David J. O'Reilly  
Chairman and Chief Executive Officer  
Chevron Corporation  
6001 Bollinger Canyon Road  
San Ramon, CA 94583

Dear Mr. O'Reilly:

It has come to this Office's attention that Chevron Corporation has been engaged for more than a decade in litigation involving alleged massive oil seepage, substandard operational practices and the resulting harm in Ecuador. As I understand the allegations, a technical expert has estimated that if the plaintiffs prevail in the litigation, damages assessed against Chevron may be as high as \$27 billion.

Under the Martin Act, this Office has broad authority to investigate and pursue allegations of financial fraud and material misstatements in connection with publicly traded companies. In recent weeks, we have received complaints regarding Chevron's disclosures of the potential litigation risks and Chevron's characterization of available legal defenses. For example, it is our understanding that Chevron has repeatedly stated in its public filings that "the company believes that the court [in Ecuador] lacks jurisdiction over Chevron." However, our review of filings in *Aguinda v. ChevronTexaco* seems to state that Chevron consented to the jurisdiction of that very Ecuadorian court.

Given the fact that both New York State and New York City public pension funds hold substantial Chevron Shares and that many New Yorkers are also shareholders (including Amnesty International USA), this Office has an interest in ensuring that public statements about the litigation are accurate and complete. Further, shareholders also have a right to know what contingencies, if any, have been taken by Chevron in recognition of a possible adverse ruling in the litigation. Accordingly, I request that Chevron submit a written response to two sets of questions:

1) What is Chevron's expectation of the probable outcome of the litigation? What is its estimate of possible damages if found liable? What if any disclosure has been made of these

estimates? And, what if any reserves have been established in contemplation of such damages being assessed against Chevron?

2) In public filings with the U.S. Securities and Exchange Commission, Chevron has asserted the Ecuadorian Court lacks jurisdiction over Chevron. How is that assertion consistent with the stipulations and orders entered at the time the matter was transferred from the U.S. District Court in the Southern District of New York to the court in Ecuador?

Please direct these answers to David Markowitz, Bureau Chief, Investment Protection Bureau. Your prompt reply no later than May 11, 2009, is appreciated.

Very truly yours,

 / s/   
ANDREW M. CUOMO

cc: Charles A. James, Exec. Vice President, Chevron Corporation  
Amy O'Meara, Policy Director, Economic Relations, Amnesty International  
David Markowitz