

**From:** Irwin, William T (WIrwin)  
**Sent:** Thu Mar 26 15:36:41 2009  
**To:** 'Chris Gidez'  
**Subject:** RE: Response language for Crude  
**Importance:** Normal

Asking Donchoo to ID someone. Kent or someone needs to follow with CRC also.

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**From:** Chris Gidez [<mailto:Chris.Gidez@hillandknowlton.com>]  
**Sent:** Thursday, March 26, 2009 11:27 AM  
**To:** Irwin, William T (WIrwin)  
**Subject:** RE: Response language for Crude

Did you get a body to attend yet. Why not send Wayne Berman? He blends into a crowd well (not).

**From:** Irwin, William T (WIrwin) [<mailto:WIrwin@chevron.com>]  
**Sent:** Thursday, March 26, 2009 11:26 AM  
**To:** Chris Gidez; Robertson, Kent S  
**Cc:** Adam Bromberg; Greg Mueller; [jbcraig@gmail.com](mailto:jbcraig@gmail.com)  
**Subject:** RE: Response language for Crude

Understand. We may end up with two response. One for local screenings and one for the broader world.

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**From:** Chris Gidez [<mailto:Chris.Gidez@hillandknowlton.com>]  
**Sent:** Thursday, March 26, 2009 11:23 AM  
**To:** Irwin, William T (WIrwin); Robertson, Kent S  
**Cc:** Adam Bromberg; Greg Mueller; [jbcraig@gmail.com](mailto:jbcraig@gmail.com)  
**Subject:** RE: Response language for Crude

Just keep in mind this is not intended solely for DC audiences.

Our L-T strategy is to demonize Donziger. This film provides us a great opportunity to do so.

From: Irwin, William T (WIrwin) [<mailto:WIrwin@chevron.com>]  
Sent: Thursday, March 26, 2009 11:16 AM  
To: Chris Gidez; Robertson, Kent S  
Cc: Adam Bromberg; Greg Mueller; jbcraig@gmail.com  
Subject: RE: Response language for Crude

We agree with Chris' premise that we should not tread on Berlinger because there has been effort to put some balance into the documentary. With that in mind even the opening is perhaps a bit harsh for the current climate in WDC. It is important to carefully respond in areas where the film is silent when facts are helpful to Chevron or when there are misstatements. In any communications, we should make sure that we recognize that harm has been done, but that Petro Ecuador -- in charge of the oil fields for 19 years -- is the culprit. Give us some time with this, and we will try to fold these views into the actual text.

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From: Chris Gidez [<mailto:Chris.Gidez@hillandknowlton.com>]  
Sent: Thursday, March 26, 2009 9:34 AM  
To: Irwin, William T (WIrwin); Robertson, Kent S  
Cc: Adam Bromberg; Greg Mueller; jbcraig@gmail.com  
Subject: RE: Response language for Crude

I offer some suggested response language below. I don't think we should go too hard on Berlinger (though not give him a free pass). We should direct our statement mostly at Donziger.

With respect to the LOC matter, I see that it is open to the public (though RSVP is required). We ought to send someone, not only to see the film, but to see who is there. I would not be surprised if Donziger, Fajardo or folks from Amazon Watch show up (or even from the Ecuadorian Embassy). If Donziger or Fajardo show up, we could make the case that using a LOC facility is inappropriate insofar as the screening is being used to advance the interests of lawyers in a private civil dispute.

Let me know if you want to discuss.

Here is the suggested response-only statement (I have highlighted passages to use if we need short soundbites):

The film "Crude" would never be seen as a balanced depiction of the complex issues associated with the ongoing lawsuit against Chevron in Ecuador stemming from the past involvement of its subsidiary, Texaco Petroleum Company, in an oil production consortium in that country.

While the filmmaker, Joe Berlinger, may have set out with the best of intentions, his film is little more than a propaganda tool being used by the plaintiffs' attorneys and the activist groups supporting them to raise support for their campaign against Chevron. Indeed, as we understand it, the key protagonist in the film, attorney Steven Donziger, was actually the person responsible for convincing Mr. Berlinger to produce the film, and seemingly

facilitated just about every aspect of it.

The film itself deals more with the campaign that Mr. Donziger and his associates wage against Chevron than the plight of the people of the Oriente. In a revealing moment, one of Mr. Donziger's colleagues admits that he is working on the lawsuit for the primary purpose of enriching his law firm, as opposed to helping the people he purports to represent.

In another passage from the film, Mr. Donziger is seen belittling the testimony that an indigenous Ecuadorian Indian plans to present at a Chevron shareholder meeting.

Elsewhere in the film, Mr. Donziger admits to using pressure tactics against an Ecuadorian judge; something that even Mr. Donziger acknowledges would never be attempted in a U.S. court.

And Mr. Donziger talks about ways in which he can get more money out of Chevron.

Mr. Donziger is also seen as whispering in the ear of Ecuador President Rafael Correa, and discussing ways in which he can enlist President Correa's intervention in the case.

In this regard, the film unintentionally but persuasively validates the concerns Chevron has raised – that the lawyers behind this lawsuit are employing unethical means to corrupt the judicial process in their pursuit of a lucrative payday at the expense of Chevron and its shareholders.

What the film does not address in any significant way, however, is the 18 year record of environmental mismanagement of the government's own oil company, which has exclusively operated the oil fields since 1990.

As a filmmaker and not a journalist, Mr. Berlinger is not held to the normal standards of balance and accuracy expected of the news media. And his film reflects this.

From: Irwin, William T (WIrwin) [mailto:WIrwin@chevron.com]  
Sent: Thursday, March 26, 2009 7:26 AM  
To: Robertson, Kent S  
Cc: Chris Gidez; Adam Bromberg; Greg Mueller  
Subject: Response language for Crude

Isn't there already some prepared response language for Crude, and if so, can you please provide so I can look at it from a WDC perspective. Given the McGovern hosted showing 31st afternoon at the Library of Congress, we want

to be prepared.

Chris, same query to you due to time zone efficiencies. Adam/Greg, FYI.

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