

EXHIBIT 3-B

Detail of Investor Deposits Into Donziger-controlled Bank Accounts (by Year and Investor)

Exhibit 3-B

Time Period: August 2004 through January 2018

ANNUAL SUMMARY

Year	# of Deposits	Total Amount
2004	5	\$ 92,874.35
2005	18	165,621.34
2006	16	207,312.96
2007	10	1,999,911.36
2008	10	233,110.83
2009	10	217,414.62
2010	5	2,550,000.00
2011	7	1,179,486.18
2012	4	789,000.00
2013	4	447,000.00
2014	0	-
2015	0	-
2016	8	538,450.00
2017	3	237,490.00
2018	3	750,000.00
Total 2016-2018	14	\$ 1,525,940.00
Total 2004-2018	103	\$ 9,407,671.64

SUMMARY BY INVESTOR

Investor	Amount
Magister Law	\$ 3,274,486.18
Russ DeLeon	1,750,000.00
Kohn, Swift & Graf	1,166,245.46
Torvia	714,000.00
Patton Boggs, LLP	430,000.00
Glenn J. Krevlin	324,990.00
Antony Abbiati	250,000.00
James McCaffrey	250,000.00
WDIS Finance (JV Merkensteijn)	208,480.00
George R Waters	202,000.00
Olswang LLP (Woodsford)	200,000.00
Orin Kramer	150,000.00
Indigenous People Ltd (Ian Watson)	137,490.00
Cliff Eisler	104,990.00
Michael Donziger	100,000.00
Wellbeck Partners (Jay Goldstein)	99,990.00
Amazonia Recovery Limited	45,000.00
Totals	\$ 9,407,671.64

#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
1	Chase	Steven R. Donziger	61-65	8/16/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	\$ 31,397.37
2	Chase	Steven R. Donziger	61-65	10/18/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
3	Chase	Steven R. Donziger	61-65	11/8/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	12,692.39
4	Chase	Steven R. Donziger	61-65	11/22/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
5	Chase	Steven R. Donziger	61-65	11/24/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,784.59
Subtotal - 2004								\$ 92,874.35
6	Chase	Steven R. Donziger	52-65	1/19/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	27,000.00
7	Chase	Steven R. Donziger	52-65	2/3/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,818.21
8	Chase	Steven R. Donziger	52-65	2/16/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,879.95
9	Chase	Steven R. Donziger	52-65	2/16/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
10	Chase	Steven R. Donziger	52-65	2/18/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	488.70
11	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	1,240.00
12	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	4,216.98
13	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,685.30
14	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
15	Chase	Steven R. Donziger	52-65	6/23/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	910.60
16	Chase	Steven R. Donziger	52-65	6/23/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,393.06

Detail of Investor Deposits Into Donziger-controlled Bank Accounts (by Year and Investor)**Exhibit 3-B****Time Period: August 2004 through January 2018**

#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
17	Chase	Steven R. Donziger	52-65	7/18/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	6,478.58
18	Chase	Steven R. Donziger	52-65	7/21/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
19	Chase	Steven R. Donziger	52-65	7/21/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
20	Chase	Steven R. Donziger	52-65	7/21/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
21	Chase	Steven R. Donziger	52-65	8/29/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	4,509.96
22	Chase	Steven R. Donziger	5365	12/1/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
23	Chase	Steven R. Donziger	5365	12/19/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
Subtotal - 2005								\$ 165,621.34
24	Chase	Steven R. Donziger	5365	2/1/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	1,952.01
25	Chase	Steven R. Donziger	5365	2/1/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	6,026.37
26	Chase	Steven R. Donziger	5365	2/6/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,572.39
27	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	468.39
28	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,093.37
29	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,287.28
30	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,162.87
31	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
32	Chase	Steven R. Donziger	5365	6/8/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	1,453.67
33	Chase	Steven R. Donziger	5365	6/8/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,651.98
34	Chase	Steven R. Donziger	5365	6/14/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,360.32
35	Chase	Steven R. Donziger	5365	6/14/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,367.24
36	Chase	Steven R. Donziger	5365	6/14/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	40,000.00
37	Chase	Steven R. Donziger	5365	8/28/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	7,156.46
38	Chase	Steven R. Donziger	5365	9/1/2006	Check deposit	Kohn, Swift & Graf	Steven R. Donziger	45,000.00
39	Chase	Steven R. Donziger	5365	11/30/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	65,760.61
Subtotal - 2006								\$ 207,312.96
40	Chase	Steven R. Donziger	5365	2/26/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	9,284.09
41	Chase	Donziger & Associates	0218	3/23/2007	Wire Transfer	Russ DeLeon	Donziger & Associates	1,750,000.00
42	Chase	Steven R. Donziger	5365	5/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	13,629.31
43	Chase	Steven R. Donziger	5365	5/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
44	Chase	Steven R. Donziger	5365	5/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	90,000.00
45	Chase	Steven R. Donziger	5365	7/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	20,187.72
46	Chase	Steven R. Donziger	5365	8/13/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
47	Chase	Steven R. Donziger	5365	9/13/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	13,340.47
48	Chase	Steven R. Donziger	5365	10/22/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
49	Chase	Steven R. Donziger	5365	11/5/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	28,469.77
Subtotal - 2007								\$ 1,999,911.36

Detail of Investor Deposits Into Donziger-controlled Bank Accounts (by Year and Investor)

Exhibit 3-B

Time Period: August 2004 through January 2018

#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
50	Chase	Steven R. Donziger	5365	5/21/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	10,489.30
51	Chase	Steven R. Donziger	5365	5/21/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	45,000.00
52	Chase	Steven R. Donziger	5365	7/14/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
53	Chase	Steven R. Donziger	5365	8/5/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	24,004.50
54	Chase	Steven R. Donziger	5365	9/9/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,147.93
55	Chase	Donziger & Assoc.	0218	9/29/2008	Check Deposit	Kohn, Swift & Graf	Donziger & Associates	45,000.00
56	Chase	Steven R. Donziger	5365	10/28/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	14,313.25
57	Chase	Steven R. Donziger	5365	12/17/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	7,407.13
58	Chase	Steven R. Donziger	5365	12/17/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	9,248.72
59	Chase	Steven R. Donziger	5365	12/17/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	42,500.00
Subtotal - 2008								\$ 233,110.83
60	Chase	Steven R. Donziger	5365	3/2/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	8,351.15
61	Chase	Steven R. Donziger	5365	3/2/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,713.54
62	Chase	Steven R. Donziger	5365	4/7/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
63	Chase	Steven R. Donziger	5365	5/12/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	18,363.28
64	Chase	Steven R. Donziger	5365	5/12/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
65	Chase	Steven R. Donziger	5365	7/20/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	44,986.65
66	Chase	Steven R. Donziger	5365	7/27/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
67	Chase	Steven R. Donziger	5365	8/19/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,000.00
68	Chase	Steven R. Donziger	5365	8/19/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	17,500.00
69	Chase	Steven R. Donziger	5365	10/9/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	17,500.00
Subtotal - 2009								\$ 217,414.62
70	Chase	Donziger & Assoc.	0218	2/17/2010	Transfer	Orin Kramer	Donziger & Associates	150,000.00
71	Chase	Donziger & Assoc.	0218	3/10/2010	Transfer	Magister Law	Donziger & Associates	500,000.00
72	Chase	Donziger & Assoc.	0218	6/11/2010	Transfer	Magister Law	Donziger & Associates	250,000.00
73	Chase	Donziger & Assoc.	0218	8/17/2010	Transfer	Magister Law	Donziger & Associates	1,250,000.00
74	Chase	Donziger & Assoc.	0218	12/31/2010	Transfer	Patton Boggs, LLP	Donziger & Associates	400,000.00
Subtotal - 2010								\$ 2,550,000.00
75	Chase	Donziger & Assoc.	0218	2/24/2011	Deposit	Michael Donziger	Donziger & Associates	100,000.00
76	Chase	Donziger & Assoc.	0218	3/18/2011	Transfer	Patton Boggs, LLP	Donziger & Associates	30,000.00
77	Chase	Donziger & Assoc.	0218	6/16/2011	Transfer	Magister Law	Donziger & Associates	307,469.57
78	Chase	Donziger & Assoc.	0218	7/1/2011	Transfer	Magister Law	Donziger & Associates	115,000.00
79	Chase	Donziger & Assoc.	0218	8/19/2011	Transfer	Magister Law	Donziger & Associates	350,000.00
80	Chase	Donziger & Assoc.	0218	9/26/2011	Transfer	Magister Law	Donziger & Associates	27,016.61
81	Chase	Donziger & Assoc.	0218	11/15/2011	Transfer	Magister Law	Donziger & Associates	250,000.00
Subtotal - 2011								\$ 1,179,486.18

Detail of Investor Deposits Into Donziger-controlled Bank Accounts (by Year and Investor)

Exhibit 3-B

Time Period: August 2004 through January 2018

#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
82	Chase	Donziger & Assoc.	0218	2/2/2012	Transfer	Magister Law	Donziger & Associates	225,000.00
83	Chase	Donziger & Assoc.	0218	5/18/2012	Transfer	Torvia	Donziger & Associates	380,000.00
84	Chase	Donziger & Assoc.	0218	11/23/2012	Deposit	Torvia	Donziger & Associates	180,000.00
85	Chase	Donziger & Assoc.	0218	11/23/2012	Deposit	Torvia	Donziger & Associates	4,000.00
Subtotal - 2012								\$ 789,000.00
86	TD Bank	Steven R. Donziger	427-7302265	2/25/2013	Wire Transfer	Torvia	Steven R. Donziger	150,000.00
87	TD Bank	Steven R. Donziger	427-7302265	4/4/2013	Wire Transfer	Amazonia Recovery Limited	Steven R. Donziger	45,000.00
88	TD Bank	Steven R. Donziger	427-7302265	10/10/2013	Wire Transfer	Olswang LLP (Woodsford)	Steven R. Donziger	200,000.00
89	TD Bank	Steven R. Donziger	427-7302265	10/28/2013	Wire Transfer	George R Waters	Steven R. Donziger	52,000.00
Subtotal - 2013								\$ 447,000.00
Subtotal - 2014								\$ -
Subtotal - 2015								\$ -
92	TD Bank	Steven R. Donziger	427-7302265	1/25/2016	Wire Transfer	George R Waters	Steven R. Donziger	50,000.00
93	TD Bank	Donziger & Assoc.	427-3938783	5/10/2016	Wire Transfer	Glenn J. Krevlin [1]	Donziger & Associates	74,990.00
94	TD Bank	Donziger & Assoc.	427-3938783	7/19/2016	Wire Transfer	Cliff Eisler [1]	Donziger & Associates	104,990.00
95	TD Bank	Donziger & Assoc.	427-3938783	10/6/2016	Wire Transfer	JV Merkensteijn (WDIS) [1]	Donziger & Associates	143,490.00
96	TD Bank	Donziger & Assoc.	427-3938783	10/21/2016	Wire Transfer	Wellbeck Partners [1]	Donziger & Associates	99,990.00
97	TD Bank	Donziger & Assoc.	427-3938783	12/19/2016	Wire Transfer	JV Merkensteijn (WDIS) [1]	Donziger & Associates	64,990.00
Subtotal - 2016								\$ 538,450.00
98	TD Bank	Donziger & Assoc.	427-3938783	2/14/2017	Wire Transfer	George R Waters	Donziger & Associates	50,000.00
99	TD Bank	Donziger & Assoc.	427-3938783	2/21/2017	Wire Transfer	Ian Watson [1]	Donziger & Associates	137,490.00
100	TD Bank	Donziger & Assoc.	427-3938783	12/11/2017	Wire Transfer	George R Waters	Donziger & Associates	50,000.00
Subtotal - 2017								\$ 237,490.00
101	Bank of America	CWP Associates	466001799158	1/2/2018	Transfer	Antony Abbiati	CWP Associates	250,000.00
102	Bank of America	CWP Associates	466001799158	1/5/2018	Transfer	James McCaffrey	CWP Associates	250,000.00
103	Bank of America	CWP Associates	466001799158	1/18/2018	Transfer	Glenn J. Krevlin	CWP Associates	250,000.00
Subtotal - 2018								\$ 750,000.00
Total - 2004 through June 2018								\$ 9,407,671.64

Note [1]: Five payments in 2016 and one in 2017 were paid through Lenczner Slaght Royce Smith.

EXHIBIT 9

Chevron Corporation v. Steven Donziger, et al.

Comparison of Known Investment at RICO Judgment and as of September 26, 2018**Exhibit 9****Time Period: August 2004 through January 2018**

Name	Known Investment Commitments as of 3/4/14 [1]	Known Investment Commitments as of 9/26/18	Known Investment as of 3/4/14 [1]	Known Investment as of 9/26/18	
Kohn Swift & Graf, P.C.	\$6,360,647	\$6,360,647	\$6,360,647	\$6,360,647	
Russell DeLeon	2,000,000	1,500,000	1,500,000	1,500,000	
Orin Kramer	150,000	150,000	150,000	150,000	
Torvia Limited	7,250,000	20,677,281	3,413,367	3,747,367	
Burford	15,000,000	4,000,000	4,000,000	4,000,000	
88 Capital	250,000	250,000			
Equitable Outcomes	150,000	150,000			
Jonaks Limited	200,000	200,000			
Satee GMBH	300,000	300,000			
David Sherman III	250,000	250,000			
Russell O. Wiese	50,000	50,000			
Michael Donziger	150,000	150,000		100,000	[2]
TC Payment Services International			424,948	424,948	
Amazonia Recovery Limited			149,000	194,000	
Temeraire Limited		2,500,000			
Olswang LLP (Woodsford)				200,000	[2]
Glenn Krevlin	250,000	850,000		600,000	[3]
Cliff Eisler		250,000		250,000	[3]
Indigenous People Limited (Ian Watson)		250,000		250,000	[3]
WDIS Finance LLC (JV Merkensteijn)		400,000		400,000	[3]
Fenwick (George Roger Waters)		202,000		202,000	[3]
Wellbeck Partner LLC (Jay Goldstein)		200,000		200,000	[3]
CHV LLV (Tony Abbiati & Client)		500,000		500,000	[3]
Totals	\$32,360,647	\$39,189,928	\$15,997,962	\$19,078,962	

Notes:

[1] - Agrees with PX 2143 from the October 8, 2013 Direct Testimony of Troy A. Dahlberg (PX 4900).

[2] - Known Investment as of 9/26/18 agrees to Summary of Investor Deposits on **Exhibit 3-B**.[3] - Known Investment as of 9/26/18 agrees to Investment Agreement Amounts on **Exhibit 2**.