





things inaccurately recording on its books and records kickback payments made by the Company to the Iraqi government, as set forth in ¶¶ 136-143, 149000 of the Information against Daimler AG.

In view of the above, the Department views the case against Daimler AG – including the cases against Daimler AG subsidiaries DaimlerChrysler Automotive Russia SAO, Daimler Export and Trade Finance GmbH, and DaimlerChrysler China Ltd. – as a related matter to the other OFF Program cases filed with the Court and, on this basis, the Department requests that the Court allow this case to be filed as such.

Respectfully submitted,

DENIS J. MCINERNEY  
Chief, Fraud Section

By:   
Mark F. Mendelsohn  
Deputy Chief, Fraud Section

  
John S. Darden  
Assistant Chief, Fraud Section

United States Department of Justice  
Criminal Division  
1400 New York Ave., N.W.  
Washington, D.C. 20005  
(202) 514-7023