

Steptoe

1330 Connecticut Avenue, NW Washington, DC 20036-1795 202 429 3000 main www.steptoe.com

October 21, 2020

Mr. Tim Pool SCNR.com

By email: tim@scnr.com

Dear Mr. Pool:

We represent Elliott Broidy and write in response to your recent inquiries to Circinus LLC. It is well known, by now, that Mr. Broidy and his business interests were the subject of an illegal hack-and-smear operation funded by the State of Qatar and executed by numerous U.S.-based co-conspirators, including those who have distributed Mr. Broidy's stolen documents and forgeries to media outlets in the United States. We write today to put you on notice that proceeding without independently confirming facts would constitute reckless disregard as to the publication of potentially false and defamatory stories.

Your vague inquiries thus far appear to be based on documents purporting to relate to Circinus' business proposals in Nigeria. As far as we can tell, no other media outlet in the United States has been provided or reported on any such purported documents. As a result, we have reason to suspect that you are in direct contact with and receiving stolen and potentially doctored materials from individuals directly involved with the Qatari-sponsored hackers. As an example of the peril of relying upon these sources, the suggestion that any sales were made to Nigeria, as you suggest in your questions, is false.

You should be aware that the sources providing you with materials purporting to have been sent or received by Mr. Broidy, his associates, or his businesses are participants in an unlawful conspiracy trafficking in stolen property and potentially (once again) also forged materials. Sources trafficking in Mr. Broidy's stolen emails have also been involved in disseminating complete fabrications, such as documents forged out of whole cloth purporting to show Mr. Broidy involved in an illicit business transaction.

Now that you are on notice about the strong potential of your Qatari-funded sources providing you false information via stolen and potentially forged documents, we urge caution in proceeding on the basis of these materials. Whatever story you think you have, they do not accurately reflect Circinus's business activities. As already noted, Circinus has never made any sales in Nigeria; thus, any documents suggesting the contrary are likely not authentic. Since

Mr. Tim Pool October 21, 2020 Page 2 Steptoe

your reporters have not shared any documents in their possession with Mr. Broidy, however, we have not been able to review.

Please be apprised that we will take whatever steps are necessary to protect Mr. Broidy from harm caused by the publication of defamatory stories propped up by stolen and potentially altered or forged materials. Broidy and Circinus reserve all rights and remedies for any defamatory publication by you.

Sincerely,

Filiberto Agusti

cc: Rocco Castoro (rocco@scnr.com)
Emily Molli (emily@scnr.com)