

Summary of Costs and Expenses as of July 2018 for Hoffman's Investigation: \$ 8,649,412.00

August 2015 Report to Council

- \$4,130,000 to Sidley for original Report
- \$660,000 to WilmerHale
- \$175,000 to crisis management team

With respect to severance costs as a result of the Hoffman report, the aggregate total amounted to \$2.6 million of contractual obligations and waiver of claims. Specifically:

- Honaker: \$558,000
- Farberman: \$701,000
- Anderson: \$1,375,000

October 2015 Jesse Raben Email to Council

\$47000 to Sidley for the Revisions and the Amended Report (so that those named in the Report would have a chance to give comments to Hoffman but those named weren't given that opportunity)

August 2016 Report to Council

\$200,000 to Sidley for rehire review (unclear if paid); Plaintiffs have unconfirmed statements from third parties that a draft of this supplemental Report was created but rejected by APA's outside counsel WilmerHale in October/November 2016

APA 2016 Tax Returns

WilmerHale \$1,037,412

No Information:

- APA's new outside counsel in D.C. (since February 2017)
- APA's counsel in Dayton, OH
- APA's counsel in Boston, MA
- Costs associated with in-house counsel travel, etc.

Notes

- APA and Sidley's original engagement letter did not contain any indemnification; the Sidley and APA new engagement letter signed when they rehired Hoffman to fix the Report has never been made public, nor the terms of that engagement given to Council.
- APA is required to arbitrate any dispute with Sidley per the original engagement letter.
- The statute of limitations for legal malpractice is three years Council has never been appraised on APA's efforts to recoup any of these costs.
- Hoffman has never fixed the Report which the Board stated in February 2016 to Council that the organization had a fiduciary obligation to fix.
- Hoffman himself admitted he found no evidence of torture at the Council meeting in August 2015 but members of Council continue to make claims to that effect in the press and linking to the Report thereby damaging APA.