NYSCEF DOC. NO. 16

RECEIVED NYSCEF: 05/23/2017

Exhibit B

NYSCEF DOC. NO. 16

INDEX NO. 100175/2013

RECEIVED NYSCEF: 05/23/2017

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

THE STATE OF NEW YORK ex rel. ERIC RASMUSEN,

Plaintiff.

- against -

CITIGROUP INC.,

Defendant.

Index No. 100175/2013

Hon. Charles E. Ramos IAS Part 53

Mot. Seq. No. 002

STIPULATION

The parties hereby stipulate and agree to the attached corrections to the transcript of the

May 17, 2017 oral argument in the above-captioned action.

Dated: May 23, 2017

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INDEX NO. 100175/2013

RECEIVED NYSCEF: 05/23/2017

Name of Case: <u>State of New York ex rel. Eric Rasmusen v. Citigroup Inc.</u>,

Index No. 10017/2013 (Sup. Ct. N.Y. Cty.) (Ramos, J.)

Date of Hearing: May 17, 2017

ERRATA SHEET

Page	Line	Change From	Change To	Reason
2	4	York, has	York. Has	Typographical Error
2	7	Ed Polubinski.	Ted Polubinski.	Error in Transcription
2	15	Ed Polubinski,	Ted Polubinski.	Error in Transcription
2	16	from Citigroup.	for Citigroup.	Error in Transcription
2	18	business	business and public	Error in Transcription
			policy professor	_
2	20	his taxes	its taxes	Error in Transcription
3	3-4	transactions, the creditor	transactions that	Error in Transcription
		he engaged in	Citigroup engaged in	_
3	7	I.R.S., which Citi relied	I.R.S. Notices, which	Error in Transcription
		on, expressly says that	Citi relied on, expressly	
		they were not to.	say that they were not	
			changes in control.	
3	16	tax recording is correct.	tax reporting was	Error in Transcription
			correct.	
4	7	New York Law	New York False Claims	Error in Transcription
			Act	
4	10	until the relator is an	unless the relator is an	Error in Transcription
		original source	original source	
4	20-21	paper, itself based	paper, itself based	Typographical Error
		entirely on public facts	entirely on public facts,	
		that alleges	that alleges	
4	26	alone suggests that he	alone alleges that Citi's	Error in Transcription
		alone alleges the Citi's		
5	5	a relator should take	a relator could take	Error in Transcription
5	11	in	is	Error in Transcription
5	12	2011, the quoted	2011. The quote	Error in Transcription
5	13	the fraud is already in	a fraud are already in the	Error in Transcription
		public	public	
5	16	doubt, substantially,	doubt that substantially	Error in Transcription
5	22	state operating losses	state net operating loss	Error in Transcription
		deductions.	deductions.	
5	24	the Citi	Citi	Error in Transcription
6	4	complaint.	policy paper.	Error in Transcription
6	12	the public disclosure	the public disclosure bar	Error in Transcription
		would	would	
6	16	own paper.	own policy paper.	Error in Transcription
6	18	wrongfully	wrongly	Error in Transcription

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Page	Line	Change From	Change To	Reason
6	22	Jamaica	The Jamaica	Error in Transcription
7	24	and some bedrock	under bedrock	Error in Transcription
8	7-8	that; reported	that; it reported	Error in Transcription
8	11	1453(k)(1)	1453(k-1)	Typographical Error
8	18	imply	apply	Error in Transcription
8	23	claim of accuracy	claimed inaccuracy	Error in Transcription
8	23	it's	its	Typographical Error
8	24	claim of accuracy	claimed inaccuracy	Error in Transcription
9	9	Michaelson	Michaelsen	Typographical Error
9	10	that New	that "New	Typographical Error
9	12	possible, and	possible," and	Typographical Error
9	24	from	for	Error in Transcription
10	11	rules	the rules	Error in Transcription
10	13	Citigroup,	Citigroup	Typographical Error
10	14	it's	its	Typographical Error
10	19	Court to dismiss	Court dismiss	Error in Transcription
10	26	Hodgson	Hodgson Russ	Error in Transcription
11	14	adhere	hew	Error in Transcription
11	19	it	its	Typographical Error
12	2	adduced	deduced	Error in Transcription
12	6	adduced	deduced	Error in Transcription
12	16	findings	filings	Error in Transcription
12	22	1450,	1453,	Error in Transcription
13	3	was attached to my	was not attached to my	Error in Transcription
		affirmation as	affirmation as was	
14	23	10-k not satisfactory	10-K not satisfy	Error in Transcription
15	7	"Providing such	"provided that such	Error in Transcription
		information	information	
15	12	"Or any	"Or under any	Error in Transcription
15	16	satisfactory	satisfy	Error in Transcription
15	17	10-K's	10-K	Error in Transcription
15	20	satisfactory	satisfy	Error in Transcription
16	6	the action	a qui tam action	Error in Transcription
16	7	state – the	state" – the	Typographical Error
16	8	position – or	position – "or	Typographical Error
16	9	the plaintiff	the qui tam plaintiff	Error in Transcription
16	10	information. They're	information." He's not.	Error in Transcription
4.6	10	not.		
16	13	there is's	there's this	Error in Transcription
16	25	190(b)(2)	190(9)(b)(ii)	Error in Transcription
16	26	SEC rules.	SEC reports.	Error in Transcription
17	6	receives	requests	Error in Transcription
17	12	qualify for	qualify as	Error in Transcription
17	19	Congressional report	Congressional reports	Error in Transcription

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Page	Line	Change From	Change To	Reason
17	24	we're the provider	there's a "provided that"	Error in Transcription
20	23	reckless	recklessness	Error in Transcription
21	16	you your	your	Error in Transcription
22	5	What other,	What, other	Typographical Error
22	12	1453(k)(1)	1453(k-1)	Typographical Error
22	17	what	and	Error in Transcription
23	21	Maybe not.	If they are not, Your	Error in Transcription
			Honor can cut me off.	
24	19	the Citi's	Citi's	Error in Transcription
24	22	Bosch	Bosh	Typographical Error
25	24	states	state	Error in Transcription