

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SECURITIES AND EXCHANGE COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 10-1277 (ESH)
)	
CITIGROUP, INC.,)	
)	
Defendant.)	

ORDER

Based on the hearing held on August 16, 2010, and for the reasons stated in open court, it is hereby **ORDERED** that on or before September 8, 2010, plaintiff shall file a memorandum that addresses the following questions:

- What is the evidence that supports the charges that defendant committed fraud via negligence? (*See* Compl. ¶¶ 47-50.) Why did plaintiff not charge fraud under Section 10(b) of the Securities Exchange Act of 1934?
- Who are the individuals referred to throughout the complaint as “senior management”?
- Why has plaintiff chosen to pursue only Gary L. Crittenden and Arthur H. Tildesley, Jr., for the misconduct alleged in the complaint? *See In re Crittenden*, S.E.C. Release No. 34-62593, 2010 WL 2992474 (July 29, 2010).
- Why is the proposed \$75 million civil penalty to be paid by shareholders fair, adequate, reasonable, and in the public interest? How is this proposed civil penalty consistent with the nine considerations and other policies that plaintiff set forth in

