

CHINA

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FORMAL NOTICE, DO NOT IGNORE!

18 U.S. Code Chapter 96 - RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS

18 U.S. Code § 1956 - Laundering of monetary instruments

18 U.S. Code § 1957 - Engaging in monetary transactions in property derived from specified unlawful activity

Mr. George Walker
Neuberger Berman
1290 Avenue of the Americas,
New York City,
New York, 10104,
United States

- (1) Dear Mr. Walker,
- (2) My name is [REDACTED]. I will send you scans of my IDs in a separate email. On February 16, 2023, I was formally notified, *for the first time* and via regular mail¹, that the European Court of Human Rights approved my request for anonymity (Rules 33 and 47 of the Rules of Court). I am therefore kindly asking you, you and whoever will follow up this case, to make sure my request to remain anonymous is respected. Thank you.
- (3) Mr. Edward LEHMAN, an American lawyer based in Beijing, agreed to help me in this matter. Mr. Lehman knows your cousin Mr. Neil BUSH². A couple of phone calls and you can easily confirm my identity and that I am a real person. **This is not a hoax.**
- (4) I am CC'ing this communication to the FBI and will later CC it to the SEC and to Homeland Security Investigations. I strongly encourage you to reach out to them also.
- (5) I am writing to you today to formally notify you that **Neuberger Berman has invested in a company which has engaged in a pattern of racketeering activity** (18 U.S.C. § 1961 (5)). The criminal entity Neuberger Berman has invested into is McDonald's Corporation. **Therefore, Neuberger Berman is about to commit the crime of money laundering as defined in 18 U.S.C. § 1957 and the purpose of this communication is to try to alert you of what has happened so far in the McDonald's RICO case.**
- (6) Shortly before former CEO Steve Easterbrook started being investigated in 2019, I was being subjected to various pressures and threats for trying to alert, again, the French authorities on the frauds McDonald's France has committed. As you will later understand, Steve Easterbrook knows that McDonald's Corporation has engaged in money laundering.

¹ Notification, dated November 2, 2022, by the European Court of Human Rights (ECtHR) received on February 16, 2023. **Please note that despite the fact the notification states that the ECtHR also notified me by email, I never received their email. The postmark of the Chinese post office shows "2023.01.30".**

² <https://www.lehmanbush.com/team>

- (7) It's not impossible that both Chris Kempczinski and Enrique Hernandez Jr. also know that McDonald's Corporation has engaged, and is still engaging as of today, in money laundering. However, I nevertheless want to try to give them the benefit of the doubt. Nevertheless, everyone should be extremely cautious and skeptical of how they intend to justify the crimes committed by McDonald's Corporation. Considering that RICO statute provides for criminal penalties of 20 years in prison, I can perfectly understand that lots of executives can be tempted to bury their head in the sand.
- (8) McDonald's Corporation and its subsidiary companies, and their accomplices, have engaged in a pattern of racketeering activity through sweepstakes/lottery frauds, money laundering of sweepstakes/lottery frauds, corruption of foreign officials, and obstruction of justice.
- (9) To these accusations, I now believe it's relatively safe to say that McDonald's Corporation and its subsidiary company McDonald's USA, and their accomplices, have also received income through the collection of an unlawful debt³.
- (10) Due to the serious nature of the crimes McDonald's Corporation and its accomplices have committed, and for the purpose of transparency, I publish most of my communications regarding this matter online.
- (11) Furthermore, I will list all of the notified investors in the criminal entity McDonald's Corporation on a website⁴ dedicated to that effect.
- (12) Indeed, by investing in McDonald's Corporation, investors are *de facto* financing organized crime, and "RICO forfeiture provisions forfeit capital interests in corporations and partnerships."⁵
- (13) Also, 18 U.S. Code § 1957 (a) states that "Whoever, in any of the circumstances set forth in subsection (d), **knowingly engages or attempts to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and is derived from specified unlawful activity**, shall be punished as provided in subsection (b)." (I emphasize)
- (14) "**The government does not have to prove that [defendant] knew that the money was derived from the [specified unlawful activity]** or that [defendant] committed the [specified unlawful activity]. **It is enough that [defendant] had general knowledge** that the [money; deposit; etc.] came from **some kind of** criminal offense."⁶ (I emphasize)
- (15) **Mr. Walker, one of the purposes of my communications to you, and your compliance officers, and your legal counsels, is for you all to understand how Neuberger Berman is currently financing organized crime simply by owning shares of the criminal entity McDonald's Corporation.** It's a serious accusation that I am making against McDonald's but I know that I will easily convince you just as I convinced former General Counsel of McDonald's Corporation, Gloria Santona, back in 2015. More about this later, and the timing of what happened when she left McDonald's Corporation.

³ 18 U.S. Code § 1962 - Prohibited activities

⁴ MCDstockInvestors.com

⁵ <https://www.ojp.gov/ncjrs/virtual-library/abstracts/rico-forfeitures-business-scope-forfeiture-should-fit-crime>

⁶ <https://www.mad.uscourts.gov/resources/pattern2003/html/patt3zzb.htm>

- (16) So please be diligent and **DO NOT IGNORE WHAT I AM GOING TO EXPLAIN BECAUSE ONE OF MY GOALS IS TO MAKE CERTAIN THAT INVESTORS I NOTIFY CAN'T LATER CLAIM PLAUSIBLE DENIABILITY.**
- (17) As you can read on Steve-Easterbrook.com (*non-official* website on Steve Easterbrook, former CEO of McDonald's Corporation), before he got fired, supposedly for a consensual relationship, I was saying that "Mr. Easterbrook should be arrested" and that "he will try to use plausible deniability" and that "he is currently defrauding investors by not issuing a profit warning."
- (18) If you have any questions, you and/or your compliance officers and/or your attorneys, you shouldn't hesitate one second to ask me what you want to ask. I will answer you.
- (19) I am going to systematically report to the FBI, to the SEC, and to Homeland Security Investigations⁷ all of the investors that I am notifying.
- (20) BEFORE I START, I want to quote a document I found on the website of the U.S. Court of Appeals for the Third Circuit. These are criminal jury instructions⁸ for cases of money laundering. Important: these instructions are given in respect of
- (21) "6.18.1956-4 Money Laundering - Knowledge that Property Represents Proceeds of Some Form of Unlawful Activity Defined

*The third element that the government must prove beyond a reasonable doubt is that in conducting a financial transaction (name) knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. **To satisfy this element, the government must prove** that (name) knew the property involved in the transaction represented proceeds from **some form of unlawful activity** that is a felony offense under state, federal, or foreign law. **The government is not required to prove that (name) knew what the unlawful activity was.**"⁹ (I emphasize)*

(22) Furthermore...

(23) "In *Wert-Ruiz*, 228 F.3d at 254-55, the trial court gave the following **"willful blindness" instruction:**

*When knowledge of the existence of a particular fact is an essential part of an offense, **such knowledge may be established if a defendant is aware of a high probability of its existence,** unless she actually believes that it does not exist.*

*So with respect to the issue of a defendant's knowledge in this case, if you find from all the evidence beyond a reasonable doubt that **the defendant deliberately and consciously tried to avoid learning that certain currency was the proceeds of some form of illegal activity, and that the defendants deliberately and consciously tried to avoid learning that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the proceeds of the unlawful***

⁷ <https://www.ice.gov/operational-priorities/financial-crime>

⁸ https://www.ca3.uscourts.gov/sites/ca3/files/2017_Chap_6_MoneyLaundering_revisions_final.pdf

⁹ *Ibid.*

activity, you may treat such deliberate avoidance of positive knowledge as the equivalent of knowledge.¹⁰ (I emphasize)

- (24) I will now demonstrate to you how McDonald's Corporation acquired the knowledge that its subsidiary companies, and their accomplices, were engaging in money laundering.
- (25) Interpol's website has a page on money laundering. It states that "***the investigation of money laundering usually goes hand in hand with the investigation of the original crime generating the proceeds.***"¹¹ (I emphasize)
- (26) **The obviousness**, when explained properly, **of one of the original crimes** committed by McDonald's Corporation and its subsidiary companies, in association with their accomplices, **is key to understand the money laundering aspect of this major RICO case.**
- (27) I believe the corporate veil will easily be pierced¹² for the investors who will decide to ignore my warnings and keep financing a corporation, still engaging as of today, in a pattern of racketeering activity.
- (28) **For the record, I want to believe that you, Mr. Walker, are a man of integrity and I also want to believe that it will never be your intention in the first place to ignore these crimes.**
- (29) Some of the frauds committed by McDonald's are extremely cunning and are almost impossible to discover. There is however one fraud which was so obvious to the then General Counsel of McDonald's Corporation, Gloria Santona. It was so obvious that she would almost immediately acknowledge that there is a problem.
- (30) Let me start with a quick recap. I also invite you to read again the 2-page Statement of Facts¹³ that Mr. Lehman asked me to write.
- (31) It's mostly, but not only, related to the McDonald's Monopoly sweepstakes/lottery. There are two main parts: the collect-to-win and the instant-win. Let's start with the collect-to-win. I quote an article¹⁴ written by Walt Hickey to explain the Monopoly collect-to-win sweepstakes if you've never played before: "*Every time you purchase certain items at McDonald's [...] you'll get to peel off [...] game stamps. These game stamps can correspond to either an instant prize, or they can correlate to a space on the Monopoly board. For spaces on the Monopoly board, if you get all the properties of a single color — or the Railroads — you win a prize.*"

¹⁰ Ibid.

¹¹ <https://www.interpol.int/en/Crimes/Financial-crime/Money-laundering>

¹² "Piercing the corporate veil" refers to a situation in which courts put aside **limited liability** and hold a **corporation's shareholders** or **directors** personally liable for the corporation's actions or **debts**. Veil piercing is most common in **close corporations**. [...]"
Source: https://www.law.cornell.edu/wex/piercing_the_corporate_veil

¹³ https://www.ecthrwatch.org/timeline/2-page-only-statement-of-facts-mcdonalds-pattern-of-racketeering-activity/2-page_statement-of-facts_mcdonalds_rico_pora_fcpa_case_Redacted.pdf

¹⁴ <https://www.businessinsider.com/math-mcdonalds-monopoly-odds-probability-2013-7>

- (32) The journalist goes on: “**Here's the secret to McDonald's Monopoly. Many people assume that all the spaces are equally likely.**” (I emphasize) I agree but for the record, when he says “the secret” **I believe it's in fact fraudulent misrepresentation.** But never mind right now, let's move on. He continues: “*Instead, McDonalds was much smarter about it. They make Baltic show up 1 in 10 times and Mediterranean show up 1 in 100,000 times. This means that almost all the game pieces are entirely worthless, and only one game piece from every set is actually tantamount to winning the prize.*” (I emphasize)
- (33) In 2011, I was the victim of what I now know is called a pattern of racketeering activity. The U.S. version of the sweepstakes/lottery would ambiguously tell the consumers the probability of winning. Ambiguously because it was hidden deep inside the official rules that almost nobody reads. Again, I believe the concept is illegal in the U.S. because it is fraudulent misrepresentation, but let's not talk about this part now. **In France, when I became a victim of this fraud, McDonald's France was explicitly claiming there was an equal quantity of each property! Furthermore, they never warned anywhere, not even hidden deep inside the official rules, that some properties were actually rare.**
- (34) Legally speaking, McDonald's France and their accomplices committed fraud as defined by article 313-1 of the French criminal code¹⁵.
- (35) So, yes. In 2011, I was a victim of the pattern of racketeering activity McDonald's has engaged into for decades and which affects many countries including the United States. I am now, involuntarily and against my will please believe me, a key witness, but also somehow an analyst¹⁶ based on a definition given in a book I recently started reading, and also somehow a whistleblower¹⁷, in a RICO case targeting McDonald's Corporation and its subsidiary companies, and their accomplices.
- (36) After having been defrauded in 2011 in the McDonald's Monopoly sweepstakes/lottery (I explain later what the frauds consisted of), I started notifying McDonald's France that they had committed fraud. They totally ignored my first warnings sent in December 2011, through certified mail. I sent a total of 6 certified mails, all of them with proof of receipt requested. McDonald's didn't answer me. They ignored me.
- (37) In a letter dated June 12 2012, I notified McDonald's France and their executives again. Through 6 certified mails, again. With proof of receipt requested, again. **I also asked McDonald's France to notify McDonald's Corporation that they were committing fraud** and that McDonald's Corporation should issue a profit warning. **Yes! As early as 2012, I also asked them to notify some of the executives of McDonald's Corporation, including, but not limited to, the General Counsel of McDonald's Corporation Gloria Santana.**

¹⁵ https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000006418192

¹⁶ “An analyst is not a traditional original source, but is a person who puts together public or secondary information in a manner that permits the commissions to learn that a violation has occurred.”
Kohn, Stephen Martin; The New Whistleblower's Handbook . Lyons Press. Kindle Edition.

¹⁷ <https://www.sec.gov/whistleblower/frequently-asked-questions#faq-2>
“Who is a whistleblower? A “whistleblower” is a person who voluntarily provides the SEC with original information in writing about a possible violation of the federal securities laws that has occurred, is ongoing, or is about to occur.”

- (38) In a letter dated June 25, 2012, I would receive a reply from the General Counsel of McDonald's France, Françoise de Borda. She basically denies my accusations of frauds without ever explaining why. She simply makes some vague statements. Concretely, she says nothing.
- (39) In a communication dated May 26, 2013, sent to McDonald's Corporation executives Gloria Santona, Don Thomson, and Andrew McKenna, I inform the company that "McDonald's cheated and most likely in the process corrupted an officer of the law." For the record, by "officer of the law", I was referring to the *huissier de justice* who is a French Ministerial Officer (*Officier ministériel*¹⁸). I would get no answer from them. For the record and if and only if I recall correctly, Gloria Santona would later claim, when I talked to her on the phone in 2015, that she didn't recall this communication. Furthermore, I suspect McDonald's France never notified McDonald's Corporation when I asked them to in 2012.
- (40) I accuse McDonald's again, of committing fraud, in a communication dated May 30, 2013 that I sent via 6 additional certified mails, with proof of receipt requested, to McDonald's France, their executives, and the corrupted *huissier de justice* who criminally authorized the McDonald's Monopoly sweepstakes/lottery frauds to take place. I would get no reply.
- (41) It's an *huissier de justice* duty to make sure a sweepstakes is legal and it clearly was not. Without his approval, the sweepstakes/lottery simply couldn't have taken place.
- (42) IMPORTANT: if I am not mistaken, the McDonald's Monopoly frauds, in France, for the years 2013 and 2014, didn't take place. Interestingly, it was replaced with another mass-marketing fraud called the "Scratch to Win". It's important because while I will mostly focus on the McDonald's Monopoly frauds which have taken place, across the world, for decades, **the FBI and law enforcement authorities of all of the countries where McDonald's is present shouldn't forget that McDonald's has committed other mass-marketing frauds which carry different names but target the same people through the same methods.**
- (43) October 17, 2015, I send an email to the General Counsel of McDonald's Corporation (MCDC), Gloria Santona. The email is CC'ed to various executives of MCDC including then CEO Steve Easterbrook. The subject of the email is "SEC and Foreign Corrupt Practices Act violations". I clearly warn in the second paragraph already, among other things, that "**I will contact the U.S. attorney general to request the opening of a criminal investigation against McDonald's and also contact the SEC for your failure to have warned investors about the ongoing fraud that the McDonald's Monopoly constitute in Europe.**" As for the third paragraph, it ends with "Therefore, I believe McDonald's is guilty of having knowingly violated the Foreign Corrupt Practices Act."
- (44) Important precision: when I first sent this email in October 17, 2015, if I recall correctly and I believe I do, I didn't realize yet that McDonald's France had started defrauding consumers again by launching a new edition of the McDonald's Monopoly fraud scheme. But I would end up realizing it and would ask for the U.S. executives to stop the then ongoing fraud (see October 20, 2015).
- (45) October 20, 2015 (or was it the 19th?) I talked to Gloria Santona on the phone.
- (46) October 20, 2015, at 03:13 (am) (Beijing time), I send an email to Gloria Santona CC'ed to MCDC's executives. After thanking Ms. Santona "for having taken my phone call", I warn MCDC that "**McDonald's MUST GIVE THE ORDER RIGHT AWAY TO THE FRENCH HEADQUARTERS TO CEASE THEIR FRAUD IMMEDIATELY!**"

¹⁸ <https://www.dictionnaire-juridique.com/definition/officier-ministeriel.php>

I truly believe, to the best of my knowledge, that the "game" being organized right now is a fraud! A few paragraphs later, I write **"I TRULY BELIEVE THAT YOUR EUROPEAN BRANCHES ARE TRYING TO HIDE THEMSELVES BEHIND MISTAKEN ADVICES FROM LOCAL LAW FIRMS."** Near the end of the email, I write **"IF YOU ARE KNOWINGLY HIDING BEHIND A FRENCH LAW FIRM, PLEASE, I AM BEGGING, LET ME TALK TO THEM TO EXPLAIN TO THEM WHY WHAT MCDONALDS IS DOING IS A MASSIVE FRAUD."**

- (47) **KEY POINT: VERY IMPORTANT READ CAREFULLY:** October 20, 2015 at 16:48 (Beijing time), I send a formal notice by email to Nawfal Trabelsi, then CEO of McDonald's France, CC'ed to various French and American executives including Ms. Santona and Mr. Easterbrook, to order them to immediately stop the then ongoing 2015 Monopoly fraud which started again in France. I explain precisely, in French why it's a fraud. I give them a clear example of the differences between the American official rules and the French official rules:
- (48) **KEY POINT: KEEP READING CAREFULLY:** October 21, 2015 at 12:01, I send to MCDC's executives the translation of the email I sent the day before on October 20, 2015.
- (49) **Translation extracts PLEASE PAY ATTENTION TO THE EXAMPLE I GAVE MCDC'S EXECUTIVES:** [Here is an extract of the American rules : "Collect Park Place (#341) and Boardwalk (#342) to win a Prize of One Million Dollars (\$1,000,000*). One (1) Prize available in the Territory (*payable \$50,000/yr. for 20 yrs. no interest). The approximate odds of collecting Park Place are 1 in 11; the approximate odds of collecting Boardwalk are 1 in 618,106,200; the approximate odds of collecting the Winning Combination (Park Place and Boardwalk) are 1 in 3,141,832,163."]
[Règlement français : RIEN! ABSOLUMENT RIEN!]
[What about in the French rules : NOTHING! THERE IS ABSOLUTELY NOTHING!]
- (50) **What I did was to clearly demonstrate to the executives of McDonald's Corporation that while the American official rules ambiguously implied, hidden deep inside the official rules, that some of the properties were in fact extremely rare and almost impossible to get (for the record, I believe that what MCDC did in the U.S. is a form of fraudulent misrepresentation), the French official rules completely omitted this fundamental piece of information which the French consumers couldn't guess.**
- (51) **THERE, IN FRANCE, IT WAS DOWNRIGHT FRAUD!**
- (52) **But McDonald's France did something much worse:** despite me warning McDonald's France and their executives and the *huissier de justice* and asking McDonald's France to notify the U.S. headquarters and notify, among other people, the U.S. General Counsel Gloria Santona, they would keep, for the 2012 edition of their fraud, stating there is an equal proportion of each property! **They literally displayed on the front page of their website 4 game stamps "Rue de la Paix" and 3 game stamps "Avenue des Champs Elysées" thus intentionally defrauding the consumers. I submitted the evidence to the U.S. executives in my emails in 2015.**

- (53) **On October 21, 2015, the then General Counsel of McDonald's Corporation, Gloria Santana, answered¹⁹ me telling me that "[they were of course taking] such inquiries seriously".**
- (54) **The obviousness of the frauds** committed by McDonald's France and their accomplices **is a key point in understanding** why McDonald's Corporation and their executives have engaged in **money laundering**. The obviousness of the frauds prevents them from claiming plausible deniability.
- (55) **CEO Steve Easterbrook, General Counsel Gloria Santana, and many other executives knew about the money laundering because the frauds were so obvious.**
- (56) In 2015, McDonald's Corporation should have ordered its subsidiary companies, which were then actively defrauding millions of consumers, to immediately stop the ongoing mass-marketing fraud, targeting, among other people, children.
- (57) Only recently have I realized that in an almost identical matter as the one I've just described, McDonald's was once a plaintiff²⁰ and started a civil RICO lawsuit.
- (58) It's important because it means Gloria Santana could only have known that McDonald's Corporation was therefore condoning crimes falling under the Racketeer Influenced and Corrupt Organizations Act.
- (59) If you paid close attention, her reply²¹ in 2015 was CC'ed again to the then CEO Steve Easterbrook. I CC'ed first but it was her choice to CC her answer to Mr. Easterbrook.
- (60) So when I said previously that the frauds in France were so obvious, it was obvious not to the French consumers who are told that there is an equal quantity of each property but it was obvious to McDonald's Corporation executives because having sued Simon Marketing under RICO, they obviously knew that they were now taking the role of the villain and they (McDonald's Corporation and its accomplices) were the one committing extremely serious crimes by basically lying on the probability of winning.
- (61) **One of the key points is this: in 2015, I would keep trying to warn the U.S. executives. I would end up talking on the phone to McDonald's Corporation then General Counsel Gloria Santana. I would send her and other high level executives like then CEO Steve Easterbrook many evidence that their European subsidiary companies were violating European laws and regulations and committing serious frauds. They knew! They understood!** There was then an ongoing fraud taking place in France which they could have stopped easily. According to a piece of evidence I found in a book written by former McDonald's France CEO Jean-Pierre Petit, **it was possible for American executives through one single phone call to stop overnight an ongoing advertising campaign.** If McDonald's France had been ordered in the past to stop an ongoing advertising campaign because the advertisements were deemed distasteful, **what**

¹⁹ "Thanks for your follow-up note. Of course, we take such inquiries seriously. [...]"
Email CC'ed to CEO Steve Easterbrook
<https://www.ecthrwatch.org/timeline/mcdonalds-general-counsel-confirms-taking-inquiry-seriously-2015-10-21/>

²⁰ <https://www.ecthrwatch.org/timeline/mcdonalds-corporation-v-simons-marketing-2002-09-16/>

²¹ https://www.ecthrwatch.org/timeline/mcdonalds-general-counsel-confirms-taking-inquiry-seriously-2015-10-21/MCD--2-2015-10-21-23h47CN_Redacted.pdf

prevented, in 2015, McDonald's Corporation to do the same and to order McDonald's France to immediately stopped what was obviously an ongoing serious fraud which was making tens of millions of victims including millions of child victims? Nothing prevented them to stop the then ongoing fraud. **All McDonald's Corporation had to do was to make one single phone call to order McDonald's France to immediately stop committing an extremely serious crime.** Just one phone call! It was very easy to do.

- (62) What would have been much harder is to handle the scandal had they stopped the then ongoing 2015 serious fraud just a few days after having launched a new edition of their very profitable, but criminal, fraud scheme. Had they stopped the fraud, obviously there would have been a scandal because everyone would have wondered why did McDonald's stopped a sweepstakes/lottery which had just started.
- (63) Sometimes, it's better to cut off a limb. Yes, McDonald's France would have had gone bankrupt. Most likely some journalists and or other people would have had realized that these frauds I am describing actually took place in other countries. Maybe that's why they couldn't call it off. They must have known they were doomed. Their only chance of survival was to keep defrauding people and commit a couple of other crimes like obstruction of justice and corruption of French officials which they did. About corruption, I am not only talking the *huissier de justice* that I previously mentioned but also the General Director of the French National Police Frédéric Péchenard: McDonald's France paid money to the Péchenard & Associés law firm which was founded by the parents of Mr. Péchenard. More about this topic another time but keep in mind that when I was myself a victim of this pattern of racketeering activity, the General Director of the French National Police was Frédéric Péchenard and about a decade earlier, McDonald's France was being investigated by the French Police for lottery fraud. I guess corrupting the French Police helped a lot. They never got indicted after that.
- (64) The example of fraud I just gave is one and only one example. But McDonald's committed many other frauds. Even the U.S. version of the game was fraudulent. I now know how to demonstrate the frauds which took place in the United States for the instant-win part of this mass-marketing fraud scheme. In addition to that, I believe the collect-to-win part constitutes fraudulent misrepresentation. Last but not least, I believe McDonald's violated gambling regulations of multiple states by finding a clever but illegal trick to circumvent the AMOE (Alternative Method Of Entry) so that consumers where statistically sure to lose if they were to use the AMOE. That would make it another pattern of racketeering activity. You can read on kempczinski.com (non-official website on the CEO of McDonald's Corporation Christ Kempczinski) the formal notice²² I sent him, and other executives, in 2017.
- (65) I hope you understood the example I just gave. This fraud happened in many European countries. I don't want to argue whether this concept is legal or not in the United States. I believe it's not but it doesn't matter for now. In Europe, there is an important European Directive. It's the DIRECTIVE 2005/29/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market. I won't explain now the importance of this directive but it is an important one and I want you and your lawyers to remember its name and that it's significant.
- (66) In 2016, McDonald's France would radically change the concept of their Monopoly sweepstakes/lottery. Unfortunately for them, they committed fraud again. Yes, really. I warned them again (both McDonald's France and McDonald's Corporation). They buried their head in the sand, again. Yes. Really.

²² <https://www.kempczinski.com/open-letters/formal-notice-illegal-lottery-usa-2017-02-14/>

- (67) In 2017, McDonald's France tried to improve the 2016 new concept but I can prove the game is fraudulent. Again there is a serious problem which they should have been aware of. As a result, consumers got defrauded. I believe the root of the 2017 fraud was never solved. As a result, it's extremely likely that McDonald's France kept defrauding hundreds of millions of consumers the following years but at this point it doesn't matter any longer. Why? Because I would start trying to alert French officials and French elected officials and French magistrates about the frauds but I would be retaliated against.
- (68) Once I started being retaliated against, these crimes of witness tampering became new predicate acts in the ongoing pattern of racketeering activity.
- (69) But for now, let's put this aside. Let's get back to the frauds committed by McDonald's Corporation and its subsidiary companies, and their accomplices.
- (70) I once wrote to New York Times journalist Constant Méheut to explain to him one of the frauds McDonald's committed. Constant Méheut studied mathematics at an advanced level. He replied that he understood the fraud.
- (71) Mr. Walker, please take 5 minutes to click on this link and read the example I gave to New York Times Journalist Constant Méheut:**
- (72) <https://www.tojournalists.com/open-letters/explanations-sent-to-constant-meheut-may-25-2022/>
- (73) Whether you understand or not the fraud McDonald's committed, please let me know.
- (74) This fraud I explained to Constant Méheut happened not only in France and not only for the years 2010, 2011, and 2012. It happened in many other countries like the United States. It also happened in many European countries other than France. And in Canada and Australia too if I recall correctly.
- (75) This instant-win fraud in itself is massive in its scale.
- (76) Mr. Walker, it's past midnight in China and I am tired. I want to continue in a couple of hours after I get some sleep. It's still March the 13th in New York City.
- (77) Quickly... according to this form:
<http://pdf.secdatabase.com/1635/0001567619-23-002502.pdf>
Neuberger Berman Group LLC was holding on 2022-12-31 a total of 1,977,693 shares of McDonald's Corporation (1,902,533 + 75,160).
- (78) On March 14 or 15, 2023, the criminal entity McDonald's Corporation will pay a dividend of \$1.52 per share.
- (79) Assuming that since 2022-12-31, Neuberger Berman Group LLC didn't sell any shares nor acquired more shares of McDonald's Corporation, you will receive \$3,006,093.36 worth of dividends (1,977,693 x 1.52).
- (80) I believe that on these \$3,006,093.36 worth of dividends that you are about to receive, more than \$10,000 is derived from specified unlawful activity.
- (81) Therefore, and if and only if my understanding of 18 U.S. Code § 1957 is correct, I believe you might be about to commit the crime of money laundering.
- (82) I was trying to find back the name of the person from Neuberger Berman I talked to recently. I believe it might be Daniel Tracer but I am not 100% sure yet. I wrote to him to ask him to confirm but he hasn't replied yet.

- (83) His LinkedIn profile shows that he used to be an Assistant United States Attorney and that he handled major money laundering cases.
- (84) Mr. Tracer certainly has a better understanding than I do about 18 U.S. Code § 1957. It's only a few days ago I started finding more jury instructions documentation online which helped me get a better understanding of certain aspects of the law. But I am not a lawyer while he is a lawyer with experience.
- (85) If I am wrong, I will be very grateful if he could quickly explain to me why.
- (86) If I am not completely wrong but I haven't completely convinced you yet, please let me know what I need to demonstrate. I currently believe that it would help my case to give more examples of the frauds McDonald's Corporation and its subsidiary companies have committed.
- (87) But overall, I think that in the end, if law enforcements across the world investigate seriously (normally, Interpol should coordinate the investigations), there should be about 100 cases of mass-marketing fraud schemes against McDonald's. Maybe more.
- (88) For France, there were mass-marketing frauds from 2010 to 2017. I believe they kept committing fraud in 2018 until now.

THIS IS A DRAFT.

Taiyuan, Tuesday March 14, 2023 at 2:15 am Beijing time.

- (89) Dear Mr. Walker, it's now March 15, 2023, 20:52 (pm) Beijing time and I quickly want to finish this formal notice that I wanted to send you already months ago if not two years ago when an article was published²³ in The New York Times. The article stated that "the institutional investor Neuberger Berman became the latest investor to say it would not vote for the re-election of Richard Lenny," so I decided to add Neuberger Berman to the list of investors I wanted to notify. When I checked who was the CEO of Neuberger Berman, the name George Herbert Walker IV ringed a bell, it sounded like George Herbert Walker Bush and I realized that you were indeed related.
- (90) At some point, I would contact a friend who had worked at LehmanBush to ask for help hoping that it might facilitate the introduction. Otherwise, who would believe a story like the one I am telling you now? A few months ago, I finally decided to take the step to contact Mr. Lehman.
- (91) Mr. Walker, I feel very stressed. Yes, I've been threatened before regarding this story I am telling you now. It's the truth and I am going to CC the email containing this communication to the FBI so I hope you believe me. It's a very long story to tell and I am not sure I have the capacity right now to express myself in a way which will make sense to you. So, I want to continue my explanations by writing open letters to the new CEO of McDonald's Corporation Mr. Kempczinski and by writing open letters to the new General Counsel (now called Chief Legal Officer) of McDonald's Corporation, Ms. Ralls-Morrison, and by writing open letters to the Board of the Directors of McDonald's Corporation, and also by writing open letters to the FBI, and other investors, and other people.
- (92) And I hope I can find a way to organize everything I am going to say.

²³ <https://www.nytimes.com/live/2021/05/19/business/economy-stock-market-news>

- (93) I will keep writing to you though and I will keep explaining to you what has happened: sometimes if not often, you will receive emails addressed to you and/or to Daniel Tracer and/or to other people working for Neuberger Berman.
- (94) But please, don't buy any more shares of this criminal entity that McDonald's Corporation is. Yes, it's my conviction that by doing so, you are financing organized crime. It's not only my opinion, it's the truth based on facts and hard evidence. The frauds they committed are extremely serious. Maybe it's not very clear yet but trust me, it will become very clear very soon, maybe in a matter of days.
- (95) And for now, if I were you, I wouldn't touch these dividends you are going to receive. It's dirty money. Please at least wait for a few days until I can tell you more about this story.
- (96) No matter what, McDonald's Corporation is an unethical company. I understand business is business and many companies might be unethical. But I think this is somehow different. There is something devious in what they did. Please always remember that their frauds targeted children also since many of these sweepstakes/lottery frauds could be played by children as young as 13 years old. One of their partners in crimes, The Marketing Store, part of the HAVI group, once mentioned, on their website if I recall correctly, children as being targets. So vulnerable people as targets. It's just plain wrong.
- (97) Last, but not least, for the FBI who will, I hope, carefully read what I said:
- (98) I, [REDACTED], declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information, and belief. I fully understand that I may be subject to prosecution if, in my submission of information, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious, or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement or entry.
- (99) Yours sincerely,
- (100) [REDACTED]
- (101) [REDACTED] China
- (102) March 15, 2023, 23:08 Beijing time (+0800)

Subject: Formal notice - Money laundering 18 U.S. Code § 1957 - Engaging in monetary transactions in property derived from specified unlawful activity

Date: Thursday, March 16, 2023 at 00:42:58 China Standard Time

From: [REDACTED]

To: George Walker, Henry Rosenberg, Daniel.Tracer@nb.com

CC: elehman@lehmanlaw.com, Ambassador Nicholas Burns, ParisExec@state.gov, smithj@state.gov, mmanjarrez@fbi.gov, IwanS@state.gov, RogalskiA@state.gov, Paris ACS (U.S. Embassy), Beijing ACS (Beijing), premier@mail.gov.cn, Emmanuel Macron, english@mail.gov.cn, Catherine Colonna, Bertrand Lortholary, Laurent Bili, Guillaume Roy, Philippe Righini, presse.pekin-amba@diplomatie.gouv.fr, admin-francais.pekin-amba@diplomatie.gouv.fr, Franck Pajot, Muiy Xiao, Kevin Granville, Constant Méheut, David Enrich, Michael Forsythe, John Carreyrou, [REDACTED], Rachel Abrams, Lauren Hirsch, Julie Creswell, David Yaffe-Bellany, Tim Race, Stephanie Strom, David Gelles, Chris.Kempczinski@us.mcd.com, Desiree Ralls-Morrison, bod@us.mcd.com, Business Integrity, McDonald's Corporation - Corporate Secretary, Walter Hickey, Yves Strickler, dc@kkc.com, 蔣Qiàn 何Hé

BCC: Emmanuel Macron, [REDACTED] Kempczinski@[REDACTED], Nicholas Burns

Attachments: formal-notice-mcdonalds-money-laundering.pdf

BeijingACS@state.gov, please make sure Legal Attaché Stephen Iwan receives a copy of this email. Thank you.
ParisACS@state.gov, please make sure Legal Attaché Jarrad Smith receives a copy of this email. Thank you.

Dear Mr. Walker,

This email was also sent to Mr. Rosenberg and Mr. Tracer, and CC'ed to various people including Mr. Kempczinski, the CEO of McDonald's Corporation, and Ms. Ralls-Morrison, the Chief Legal Officer and Corporate Secretary of McDonald's Corporation.

Please read carefully the formal notice attached to this email.

McDonald's Corporation and its subsidiary companies, and their accomplices, have engaged in a pattern of racketeering activity.

Please don't finance organized crime. I understand it might sound counterintuitive to think of McDonald's Corporation as a transnational criminal entity but facts are facts.

Maybe this formal notice doesn't sound very professional. I am trying my best.

If you have any questions, don't hesitate to ask me.

Thank you.

Best regards,

[REDACTED]