



MAURA HEALEY
ATTORNEY GENERAL

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

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(617) 727-2200
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October 10, 2019

By Hand Delivery

Exxon Mobil Corporation
Darren Woods, Chairman and Chief Executive Officer
c/o Corporation Service Company, its Registered Agent
84 State Street
Boston, Massachusetts 02109

Dear Mr. Woods:

The Massachusetts Office of the Attorney General has reason to believe that Exxon Mobil Corporation (“ExxonMobil”) has violated the Massachusetts Consumer Protection Act (the “Act”), G.L. c. 93A, § 2, and applicable regulations by engaging in unfair or deceptive acts or practices in the marketing and/or sale of ExxonMobil-branded fossil fuel products to Massachusetts consumers and in the marketing and/or sale of ExxonMobil securities to Massachusetts investors. The Act, G.L. c. 93A, § 4, provides that the Attorney General may file a civil action to seek injunctive relief and restitution, obtain civil penalties, and recover the costs of investigation, including reasonable attorneys’ fees and costs, in order to address unfair or deceptive acts or practices in violation of the Act and applicable regulations.

This letter shall serve as notice, pursuant to the Act, G.L. c. 93A, § 4, that the Attorney General intends to commence an action against ExxonMobil for violations of the Act and applicable regulations. Representatives of the Attorney General’s Office are available to confer with ExxonMobil prior to the filing of this action. Should you choose to confer, any such discussions would be confidential settlement communications and inadmissible in any court pleadings or proceedings.



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If you are interested in seeking to resolve these claims prior to the Attorney General filing suit, please have your counsel contact me at richard.johnston@mass.gov or 617-963-2028.

Sincerely,

A handwritten signature in cursive script that reads "Richard A. Johnston". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Richard A. Johnston
Chief Legal Counsel

cc: Thomas C. Frongillo, Esq., Pierce Bainbridge Beck Price & Hecht LLP (by hand)
Caroline K. Simons, Esq., Orrick, Herrington & Sutcliffe LLP (by hand)
Theodore V. Wells Jr., Esq., Paul, Weiss, Rifkind, Wharton & Garrison LLP (by email)
Justin Anderson, Esq., Paul, Weiss, Rifkind, Wharton & Garrison LLP (by email)