

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITES STATES OF AMERICA

-v-

S1 15 Cr. 867 (RMB)

REZA ZARRAB,

Affirmation

Defendant.

JOSEPH JAFFE, under the penalties of perjury affirms and says:

1. I am the Chief Compliance Officer and Deputy General Counsel of Guidepost Solutions LLC ("Guidepost"). I am an attorney admitted to practice in the State of New York, and among others, the U.S. District Courts for the Southern and Eastern Districts of New York and the U.S. Court of Appeals for the Second Circuit. Prior to my joining Guidepost Solutions, among others, I served as an Assistant United States Attorney for the Southern District of New York (Chief of the Official Corruption Unit, Assistant Chief of the Criminal Division, Administrative Assistant U.S. Attorney); Acting Chief Inspector of the U.S. Drug Enforcement Administration; elected District Attorney of Sullivan County New York. I was in private practice for a decade. I have been engaged as an Investigative Consultant, licensed investigator in multiple states since 1991.

2. This Affirmation is offered to the Court to describe Guidepost and the services it has provided and would further provide should the Court grant the pending Application for Pretrial Release. We ask that the Court order this Affirmation be sealed and not made available to the public because should the Court grant pretrial release, the location of the premises where Mr. Zarrab will be confined, the full nature of the security installations made at those premises and the schedules and duty operations of those assigned, have not been made known to Mr. Zarrab and release of the information publicly could possibly compromise the operations proposed.

3. Guidepost is a global organization with a team of experienced investigators, security and technology consultants and compliance and monitoring experts. We provide security, investigative, compliance and monitoring leadership for critical client needs.

4. Members of the Guidepost Solutions team have been performing monitorships involving entities and individuals across a broad spectrum of industries in the corporate, non-profit, construction and private sectors for more than three decades. Members of our executive team include Chairman, Bart M. Schwartz; Chief Executive Officer, Julie Myers Wood; Chief Compliance Officer and Deputy General Counsel, Joseph Jaffe; President of Investigations and Monitoring, Thomas A. McShane and President of Investigations and Private Client Protection Andrew J. O'Connell, who are recognized as integrity monitors with multiple years of experience. They have had numerous court and other appointments to monitor the conduct of organizations and individuals and have received assignments from or with the approval of among others:

- a) U.S. District Court for the Southern District of New York
- b) U.S. District Court for the Eastern District of New York
- c) U.S. District Court Northern District of Illinois
- d) U.S. Department of Justice
- e) U.S. Securities and Exchange Commission
- f) U.S. Department of Commerce, Bureau of Industry and Security
- g) U.S. Department of Treasury, Office of Foreign Assets Control
- h) U.S. Attorney's Office for the Southern District of New York
- i) Occupational Safety and Health Administration
- j) Commodity Futures Trading Commission
- k) Attorney General of the State of California
- l) Attorney General of the State of New York
- m) Attorney General of the State of New York Medicaid Fraud Control Unit
- n) Office of the District Attorney of New York County
- o) New Jersey Department of the Treasury
- p) New York City Department of Investigations
- q) New York City Economic Development Corporation
- r) New York City Transit Authority
- s) New York State Department of Environmental Conservation
- t) New York State Department of Financial Services
- u) New York State Organized Crime Task Force
- v) New York City School Construction Authority
- w) Port Authority of New York and New Jersey, Office of Inspector General.

5. Guidepost has vast experience assessing security operations, as well as designing and managing the installation of physical security and life safety systems for both new and existing sophisticated facilities and operations under our Security & Technology Consulting ("STC") practice. Our typical services include threat risk and vulnerability assessments, security program evaluations, feasibility studies, peer reviews and constructability studies; security systems design, engineering, cost estimating, inspections, and commissioning. Our STC employees possess many

years of experience, incorporating a broad range of expertise from the security management and technical security disciplines in both the public and private sectors. Guidepost STC has completed hundreds of program assessments and premise security program projects across the globe, across dozens of facility types, including the homes of High Net Worth individuals, large Commercial and Industrial operations and Sports venues for multinational corporations, and critical infrastructure projects.

6. Guidepost team members have provided pretrial release services in the past to the U.S. District Courts in the Southern and Eastern Districts of New York, and the District of New Jersey. We recently provided such services in the matter of United States v. Jeffrey Webb in the Eastern District of New York and are currently providing such services in the matter of United States v. Ng Lap Seng, in the Southern District of New York. In pretrial release cases, as in all of our monitoring assignments,¹ we follow the directions and orders of the Judge ordering pretrial release, to secure and oversee the individual releasee according to that Judge's orders, and report to and interface with the Court, Pre-Trial Services or other agencies as required and directed, regardless of who may be paying our fees.

7. In this matter we have been retained by Brafman & Associates, P.C. As part of that assignment Guidepost security specialists assessed the security profile of premises located at [REDACTED]. Guidepost visited and reviewed the site, designed and oversaw the implementation of what we believe are appropriate electronic and physical surveillance measures to ensure that Mr. Zarrab may reside at the premises, while at the same time be restricted to the premises, except as otherwise ordered by the Court. Appropriate physical restraints and electronic and visual monitoring equipment have been installed and will be monitored on a twenty-four hour/seven day a week basis from within the premises by Guidepost personnel who will be assigned there on a twenty-four (24) hour basis, and online as well. Separate descriptions of the installed equipment and its details are available to the Court and Pre-Trial Services (We ask that the documents be sealed and not be made available to the public). We anticipate that, should release be granted by the Court, Pre-Trial Services will inspect the premises in advance. We will attend to any additional measures required by Pre-Trial Services.

8. In addition, Guidepost is prepared and has agreed that, should the Court approve the pretrial release of Mr. Zarrab, we will provide an appropriate number of experienced, armed (if required by the Court) security oversight professionals (all former, or off-duty, law enforcement officers), 24-hours per day, seven days per week, as oversight of Mr. Zarrab and any persons who may visit the premises, to ensure that: (a) he remains at the premises as required by the terms of

¹ Similarly, in all of our monitoring assignments, the order or agreement establishing and governing our retention, the Court, oversight, regulatory, enforcement or prosecuting authority sets the parameters of our actions and we report to them regardless of what agency or individual pays the fees involved.

the bail order to be secured; (b) he appears as required for his court appearances; and, (c) otherwise does not violate his bail conditions for as long as required by the Court.

9. In these circumstance, we propose to utilize two or three such security professionals on each shift. If more than two or three security professionals are required by the Court, we are prepared to provide as many as are needed. In addition, we will also have one supervisory security professional overseeing and scheduling the security detail. In addition, I will serve as the Project Executive for the duration of the project. The activities we will perform at the premises will be guided by the Court's direction.² We will prepare and provide such a description of actions to the Court and Pre-Trial Services once the Court has made its decision.

10. Additional security and monitoring personnel also shall be provided whenever Mr. Zarrab leaves the premises, if he is permitted to do so pursuant to the bail conditions (e.g., court appearances, attorney meetings, religious services, doctor visits). We will also provide, as needed, a security vehicle with driver, whenever such travel is required and authorized by the court. When such travel takes place, Guidepost will maintain a security presence at the residence to ensure the continuing security integrity of the residence.

11. Guidepost will communicate with Pre-Trial Services, other enforcement authorities, the Court, and/or the U.S. Attorney's Office, as required by the Court.

12. We are prepared to answer any inquiries by the Court.

Dated: New York, New York
May 26, 2016



Joseph Jaffe

² See, for example, Order, U.S. v. Ng Lap Seng, 15 Cr. 706 (VSB), filed October 23, 2015