

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

REZA ZARRAB, *et al.*,

*Defendants.*

DECLARATION OF CHRISTINE H.  
CHUNG IN SUPPORT OF DEFENDANT  
REZA ZARRAB'S MOTION TO RECUSE  
THE COURT

S1 15 Cr. 867 (RMB)

I, CHRISTINE H. CHUNG, do hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm Quinn Emanuel Urquhart & Sullivan, LLP, and counsel for Defendant Reza Zarrab. I am in good standing with the New York State Bar and the U.S. District Court for the Southern District of New York. I respectfully submit this declaration in support of Reza Zarrab's Motion to Recuse the Court (the "Motion to Recuse"), dated August 30, 2016. I submit this Declaration based upon my personal knowledge, information, and belief, in support of the Motion to Recuse.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the article "Rule of Law and Freedom of Press Under Attack in Turkey," published on May 9, 2014 in *Facts on Turkey*, available at <http://factsonturkey.org/4772/rule-of-law-and-freedom-of-press-under-attack-in-turkey/>.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the booklet reporting the proceedings of the 2014 Justice and Rule of Law International Symposium held in Istanbul, Turkey, on May 8-9, 2014, published in December 2014.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the article "Turkish Prosecutor Drops High-Level Corruption Probe," published on October 18, 2014 in *Financial*

*Times*, available at <http://www.ft.com/cms/s/0/63cf5042-56cb-11e4-a0b2-00144feab7de.html?siteedition=intl#axzz4IenMG1Ly>.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the article “Erdogan Hit by Claims of Son’s Corruption,” published on December 28, 2013 in *The Australian*, available at <http://www.theaustralian.com.au/business/wall-street-journal/erdogan-hit-by-claims-of-sons-corruption/story-fnay3ubk-1226790745552>.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the article “Graft Inquiry Intensifies Turkish Political Rivalry,” published on December 17, 2013 in the *New York Times*, available at [http://www.nytimes.com/2013/12/18/world/europe/graft-inquiry-intensifies-turkish-political-rivalry.html?\\_r=0](http://www.nytimes.com/2013/12/18/world/europe/graft-inquiry-intensifies-turkish-political-rivalry.html?_r=0).

7. Attached hereto as **Exhibit 6** is a true and correct copy of the article “Gold Trader at Heart of Turkey Graft Scandal Charged in U.S.,” published on March 22, 2016 in *Bloomberg*, available at <http://www.bloomberg.com/news/articles/2016-03-22/gold-trader-charged-in-u-s-with-violating-iran-sanctions>.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the article “U.S. Arrest of Iranian Gold Trader Reopens Wounds in Turkish Graft Scandal,” published on March 22, 2016 in *Reuters*, available at <http://www.reuters.com/article/us-turkey-usa-corruption-idUSKCN0WO2X2>.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the article “Leaked Documents Purport to Reveal Turkish Graft Allegations,” published on March 14, 2014 in *Reuters*, available at <http://www.reuters.com/article/us-turkey-corruption-idUSBREA2D1F420140314>.

10. Attached hereto as **Exhibit 9** is a true and correct copy of the article “Gülen Links Are Everywhere in Zarrab Case,” published on May 19, 2016 in *Daily Sabah*, available at <http://www.dailysabah.com/columns/ragip-soylu/2016/05/19/gulen-links-are-everywhere-in-zarrab-case>.

11. Attached hereto as **Exhibit 10** is a true and correct copy of the article “Ex-Economy Minister Traveled to Mecca with Private Jet of Key Suspect in Graft Probe,” published on January 3, 2014 in *Hürriyet Daily News*, available at <http://www.hurriyetdailynews.com/ex-economy-minister-traveled-to-mecca-with-private-jet-of-key-suspect-in-graft-probe-report.aspx?pageID=238&nID=60534&NewsCatID=338>.

12. Attached hereto as **Exhibit 11** is a true and correct copy of the article “Turkey Crisis Put Jailed Millionaire at Heart of Gold Trail,” published on January 29, 2014 in *Bloomberg*, available at <http://www.bloomberg.com/news/articles/2014-01-29/turkey-scandal-places-jailed-millionaire-at-center-of-gold-trail>.

13. Attached hereto as **Exhibit 12** is a true and correct copy of the article “Turkey Frees Cabinet Ministers’ Sons,” published on February 28, 2014 in *BBC News*, available at <http://www.bbc.com/news/world-europe-26387522>.

14. Attached hereto as **Exhibit 13** is a true and correct copy of the article “Turkey Drops Corruption Case That Dogged Government,” published on October 17, 2014 in *Reuters*, available at <http://uk.reuters.com/article/uk-turkey-corruption-idUKKCN0I623420141017>.

15. Attached hereto as **Exhibit 14** is a true and correct copy of the article “Judge Berman,” published on May 23, 2016 in *Hürriyet Daily News*, available at <http://www.hurriyetdailynews.com/judge-berman.aspx?pageID=449&nID=99508&NewsCatID=534>.

16. Attached hereto as **Exhibit 15** is a true and correct copy of the article “The Zarrab Case and the Gülenists,” published on May 17, 2016 in *Hürriyet Daily News*, available at <http://www.hurriyetdailynews.com/the-zarrab-case-and-the-gulenists.aspx?PageID=238&NID=99253&NewsCatID=534>.

17. Attached hereto as **Exhibit 16** is a true and correct English-language copy of the July 22, 2016 Order of the Turkey 7th Criminal Court of Peace banning certain partners of the Turkish law firm Yüksel Karkin Küçük from leaving Turkey.

18. Attached hereto as **Exhibit 17** is a true and correct copy of the article “The Buzz From Turkey – YukselKarkin Shut Down,” published on July 25, 2016 in *CEE Legal Matters*, available at <http://www.ceelegalmatters.com/index.php/analysis/113-the-frame/5034-the-buzz-from-turkey-yukselkarkin-shut-down>.

19. Attached hereto as **Exhibit 18** is a true and correct certified English-language copy of the article “Police Searches Yuksel-Karkin Law Partnership,” published on July 23, 2016 in *Hürriyet Daily News*, available in Turkish at <http://www.hurriyet.com.tr/unlu-avukatlik-burosuna-polis-baskini-40163245>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on August 30, 2016.

By:   
Christine H. Chung