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# THE GLOBAL INTELLIGENCE FILES

On Monday February 27th, 2012, WikiLeaks began publishing *The Global Intelligence Files*, over five million e-mails from the Texas headquartered "global intelligence" company Stratfor. The e-mails date between July 2004 and late December 2011. They reveal the inner workings of a company that fronts as an intelligence publisher, but provides confidential intelligence services to large corporations, such as Bhopal's Dow Chemical Co., Lockheed Martin, Northrop Grumman, Raytheon and government agencies, including the US Department of Homeland Security, the US Marines and the US Defence Intelligence Agency. The emails show Stratfor's web of informers, pay-off structure, payment laundering techniques and psychological methods.

## RE: Revised Stratcap Org Chart (PDF Version)

Released on 2013-11-15 00:00 GMT

|                 |  |
|-----------------|--|
| <b>Email-ID</b> | 2959548                                  |
| <b>Date</b>     | 2011-11-28 21:04:35                      |
| <b>From</b>     |  |
| <b>To</b>       | hope.massey@stratfor.com, bknippa@jw.com |

Got it...

--  
Shea Morenz  
Managing Partner  
STRATFOR  
221 W. 6th Street  
Suite 400  
Austin, Texas 78701

O: 512-583-7721 | M: 713.410.9719 | F: 512.744.4105

[www.STRATFOR.com](http://www.STRATFOR.com)

-----Original Message-----

From: Knippa, Brad [mailto:bknippa@jw.com]  
Sent: Monday, November 28, 2011 12:04 PM  
To: Shea Morenz  
Cc: Hope Massey  
Subject: Revised Stratcap Org Chart (PDF Version)

Is this what you had in mind?

Bradley S. Knippa, JD, CPA  
Jackson Walker L.L.P.  
100 Congress Avenue, Suite 1100  
Austin, Texas 78701  
Direct: (512) 236-2284

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# THE GLOBAL INTELLIGENCE FILES

On Monday February 27th, 2012, WikiLeaks began publishing *The Global Intelligence Files*, over five million e-mails from the Texas headquartered "global intelligence" company Stratfor. The e-mails date between July 2004 and late December 2011. They reveal the inner workings of a company that fronts as an intelligence publisher, but provides confidential intelligence services to large corporations, such as Bhopal's Dow Chemical Co., Lockheed Martin, Northrop Grumman, Raytheon and government agencies, including the US Department of Homeland Security, the US Marines and the US Defence Intelligence Agency. The emails show Stratfor's web of informers, pay-off structure, payment laundering techniques and psychological methods.

## RE: Stratcap International Organizational Chart (SA Ventures) - Attorney/Client Privileged Communication

Released on 2013-08-13 00:00 GMT

|                 |   |
|-----------------|---|
| <b>Email-ID</b> | 2943874   |
| <b>Date</b>     | 2011-12-06 01:02:56   |
| <b>From</b>     | bknippa@jw.com  |
| <b>To</b>       | shea.morenz@stratfor.com, hope.massey@stratfor.com, stammwc@gmail.com, jstephenson@jw.com, cmcdowell@jw.com |

Sounds good. Apologies in advance for the legal document beat-down.

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From: Craig Stamm [mailto:stammwc@gmail.com]  
 Sent: Monday, December 05, 2011 6:02 PM  
 To: Shea Morenz  
 Cc: Knippa, Brad; Hope Massey; Stephenson, John; McDowell, Cale  
 Subject: Re: Stratcap International Organizational Chart (SA Ventures) - Attorney/Client Privileged Communication

Alright, Partner, I'm on it. Brad, allow me to pop some No-doze, read your email, and we can discuss in the a.m. Does that work for you?

CS

On Mon, Dec 5, 2011 at 4:38 PM, Shea Morenz <shea.morenz@stratfor.com> wrote:

Craig: pls own this.  
 thanks  
 --  
 Shea Morenz  
 Managing Partner  
 STRATFOR  
 221 W. 6th Street

Suite 400  
Austin, Texas 78701

O: 512-583-7721 | M: 713.410.9719 | F: 512.744.4105

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-----Original Message-----

From: Knippa, Brad [mailto:bknippa@jw.com]  
Sent: Monday, December 05, 2011 4:37 PM  
To: Shea Morenz; Craig Stamm  
Cc: Hope Massey; Stephenson, John; McDowell, Cale  
Subject: FW: Stratcap International Organizational Chart (SA Ventures) - Attorney/Client Privileged Communication

Shea/Craig, attached to this email is a separate email from the Sovereign Group that has 4 forms which need to be completed. I'll coordinate with Hope to help. Let me know if who of the two of you should be my primary contact for pushing these matters through. Given JW has a good relationship with The Sovereign Group, if you can have the (roughly) \$5,100 fee wired to them JW can have them get started evening though all the underlying entity information hasn't been provided. I suggest these funds be advanced directly from Stratcap to the wire information referenced in the application. I'll follow-up with either you or Shea depending on who is my quarterback and we'll get this done. Thanks. BK

-----Original Message-----

From: Knippa, Brad  
Sent: Thursday, November 03, 2011 6:48 PM  
To: Shea Morenz  
Cc: Stephenson, John  
Subject: Stratcap International Organizational Chart (SA Ventures) - Attorney/Client Privileged Communication

Shea,

Attached is a revised Organizational Chart that reflects the combined analysis of John Stephenson (who you have met over the phone - [http://www.jw.com/John\\_M\\_Stephenson/](http://www.jw.com/John_M_Stephenson/)) and Brian Dethrow (one of our Tax partners - [http://www.jw.com/Brian\\_Dethrow/](http://www.jw.com/Brian_Dethrow/)) regarding proposed structures for the prospective South African deals.

John and Brian believe it will be most appropriate to have Stratcap International Holdings I domiciled in Cyprus. To this end, attached is a list of the "ready made" entities in Cyprus that can be acquired from the Sovereign Group. Once acquired, we can use existing of names of these entities in order to maintain some anonymity or we can change them - your call.

The updated Stratcap South Africa structure (i.e., Rev) in the Organizational Chart provides Stratcap South Africa will be a Cyprus company (that is wholly-owned by Stratcap International Holdings I) and presumes that the income will be produced by someone from the U.S. contacting persons in South Africa to assist Rev South Africa (as would be the case if a Stratfor representative were to travel to South Africa to facilitate the transaction). Under this presumption the owners of Stratcap South Africa (the Cyprus company) cannot avoid U.S. tax on the

income earned by Stratcap South Africa (the Cyprus company). Under this anticipated structure, the income stream from South Africa will be divided into two categories: (i) services rendered by personnel coming into South Africa from time to time (no permanent establishment in South Africa), and (ii) dividends attributable to 10% of the shares of Rev South Africa. We suggest that a profit participation (or a contract relationship that would likely constitute a partnership interest under U.S. income tax law) with Rev South Africa would be preferred as opposed to dividends from Rev South Africa, and that tax credits in the U.S. be leveraged so that there is no double taxation.

The updated Stratcap Hong Kong structure (i.e., the equipment sale transaction) provides for a Hong Kong company (that is wholly-owned by Stratcap International Holdings I) to be the contracting party for the services to be provided. There would be no tax in either Cyprus or Hong Kong under this structure, but this tax-free treatment is conditioned upon the funds remaining in Hong Kong and not be repatriated to the U.S.) As is the case with the Cypress entity that would be acquired, we can use existing of name to maintain anonymity or we can change the name - your call.

Be advised that the Sovereign Group, which is the trust company that currently owns the ready-made entities, would need to do some limited due diligence Stratcap International Consolidated, LLC before the Cyprus and Hong Kong entities could be acquired. Attached is an email that was sent to John Stephenson which addresses some of information that will be needed (e.g., copies of formation documents and information regarding its members and officers). In light of this due diligence, we may want a two step process for the initial Company Agreement, the first of which would be to provide them with a plain vanilla document, and the second of which would be to amend the plain vanilla document to incorporate the terms of the Company Agreement that have been reviewed by you, George and Don.

Given the many moving parts and the add'l costs that will be incurred to form the foreign entities, let me know if you'd like to schedule a call with John Stephenson and Jeff Hill to make sure we're all in sync before we proceed.

I've loaded you up with a lot of information in this email - if you'd like me to try to paraphrase it over a call let me know. I'll be back at the office after 9:00 tonight and will be generally available after 10:00 tomorrow.

BK

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