



October 14, 2021

Via email: [PFDSupport@oag.texas.gov](mailto:PFDSupport@oag.texas.gov)  
Office of the Attorney General of Texas  
Public Finance Division  
300 West 15th Street, 7th Floor  
Austin, Texas 78701

Re: Citigroup Inc. Standing Letter for the Public Finance Division  
of the Office of the Attorney General of Texas

Office of the Attorney General of Texas:

To the extent any of its contracts with a governmental entity is a contract for goods or services submitted with the record of public security proceedings, Citigroup, Inc., for purposes of sections 2252.152, 2271.002, and 2274.002, Texas Government Code, as amended, hereby confirms that it and any parent company, wholly owned subsidiary, majority-owned subsidiary, and affiliate<sup>1</sup>:

- 1) Do not boycott energy companies and will not boycott energy companies during the term of such contracts. "Boycott energy company" has the meaning provided in section 809.001 of the Texas Government Code.
- 2) Do not have a practice, policy, guidance, or directive that discriminates against a firearm entity or firearm trade association and will not discriminate during the term of such contracts against a firearm entity or firearm trade association. "Discriminate against a firearm entity or firearm trade association" has the meaning provided in section 2274.001(3) of the Texas Government Code. "Firearm entity" and "firearm trade association" have the meanings provided in section 2274.001(6) and (7) of the Texas Government Code.
- 3) Do not boycott Israel and will not boycott Israel during the term of such contracts. "Boycott Israel" has the meaning provided in section 808.001 of the Texas Government Code.

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<sup>1</sup> "Affiliate" means any entity that controls, is controlled by, or is under common control with the company within the meaning of SEC Rule 405, 17. C.F.R. § 230.405, and exists to make a profit.

- 4) Unless affirmatively declared by the United States government to be excluded from its federal sanctions regime relating to Sudan or Iran or any federal sanctions regime relating to a foreign terrorist organization, are not identified on a list prepared and maintained by the Texas Comptroller of Public Accounts under section 2252.153 or section 2270.0201 of the Texas Government Code.

The Office of the Attorney General of Texas may rely on this letter in its review and approval of public securities under Texas law. Should a change occur that renders this letter ineffective, Citigroup, Inc. will notify the Public Finance Division promptly by email to [PFDSupport@oag.texas.gov](mailto:PFDSupport@oag.texas.gov) with the phrase "Ineffective Standing Letter" in the heading.

CITIGROUP, INC.



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By: Daniel Tomson  
Its: Managing Director and Co-Head of  
Public Finance Department



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By: Paul Creedon  
Its: Managing Director and Co-Head of  
Public Finance Department