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ONE HUNDRED TENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

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April 20, 2007

David J. Lesar
Chairman, President, and Chief Executive Officer
Halliburton
P.O. Box 3111
Dubai, United Arab Emirates

Dear Mr. Lesar:

We have received the March 13, 2007, letter sent by Don Deline, Halliburton's Vice President for Government Affairs, addressing media reports that Halliburton is moving its corporate headquarters, and perhaps the entire company, to Dubai, United Arab Emirates.

The letter stated that reports that Halliburton is relocating to Dubai are incorrect and that Halliburton "is, and will remain, a U.S. corporation, incorporated in Delaware, with its principal place of business and executive office in Houston, Texas." The letter explained that although you are moving the office of the Chairman and CEO to Dubai, your move to Dubai is "not an initial step in moving the company off-shore" and "is also not intended to result in any tax benefit to the company." The letter assured this Committee that other executives of Halliburton will remain in Houston "with no plans for relocating outside of the United States."

To assist the Committee in understanding the implications of your move to Dubai, I ask that you respond in writing to the following questions:

1. What is the address of Halliburton's Dubai office? How many employees will be stationed in that office? Will Halliburton be sharing office space with any of its foreign subsidiaries or any other businesses?
2. Is there some special arrangement between Dubai officials and Halliburton that creates incentives for the move? If so, what is the arrangement?
3. How does the move to Dubai affect whether and how Halliburton as a company or Halliburton's executives are subject to U.S. taxation?

4. How does the move to Dubai affect whether and how Halliburton is subject to U.S. laws and regulations, including but not limited to SEC requirements?
5. Halliburton has faced scrutiny by Congress for its government contracting activities in Iraq. It has also been the subject of numerous lawsuits.
 - a. How does the move to Dubai affect the ability of Congress, law enforcement, or litigants to use compulsory process to secure testimony and documents from Halliburton personnel?
 - b. Will Halliburton commit to making its records and executives available in the United States to respond to any Congressional inquiry, law enforcement investigation, or civil lawsuit?
6. As a result of its government contract work, Halliburton has access to classified information and documents.
 - a. Will any classified information be transmitted to, used at, or stored at the Dubai office?
 - b. How will Halliburton ensure the security of this information?
7. Halliburton has received criticism in the press and from Congress for using foreign subsidiaries to do business with Iran.
 - a. What business, if any, does Halliburton or any of its foreign subsidiaries have with Iran or other sanctioned nations? For any contracts with any sanctioned entities, please provide the name of the entity, its country of incorporation, the names of its officers, and the location of its main headquarters.
 - b. How does the move to Dubai affect whether and how Halliburton or any of its foreign subsidiaries will do business with Iran or other sanctioned nations?
 - c. Will Halliburton commit that it and its foreign subsidiaries will refrain from trading with sanctioned nations like Iran, through its Dubai office or otherwise, in the future?

I request that Halliburton provide responses to these questions as soon as possible, but in no case later than **Friday, May 11, 2007**. In addition, I request that Halliburton produce by this date any internal reports, memoranda, or correspondence relating to the decision to move your office to Dubai.

David J. Lesar
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The Committee on Oversight and Government Reform is the principal oversight committee in the House of Representatives and has broad oversight jurisdiction as set forth in House Rule X. An attachment to this letter provides additional information about how to respond to the Committee's request.

If you have any questions, please contact Theodore Chuang or Susanne Sachsman of the Committee staff at (202) 225-5420.

Sincerely,

A handwritten signature in black ink that reads "Henry A. Waxman" with a long horizontal flourish extending to the right.

Henry A. Waxman
Chairman

Enclosure

cc: Tom Davis
Ranking Minority Member