

EXHIBIT A

Beginning in January 2003, I was employed by the Office of the New York State Comptroller as Director of Alternative Investments. In 2004, I was promoted to Chief Investment Officer, the senior official responsible for making investment decisions, and I reported directly to the Chief of Staff and Comptroller Hevesi. My responsibilities included recommending proposed investments for the New York State pension fund, known as the Common Retirement Fund. In my positions at the Common Retirement Fund, I was obligated to act exclusively in the best interests of the members and beneficiaries of the Common Retirement Fund, free from conflicts, politics and other improper pressures, and to avoid and disclose conflicts of interests and the appearance of conflicts of interest.

As detailed below, during my tenure, I, in concert with others at the Office of the State Comptroller, breached fiduciary duties and violated the public trust. Investment decisions were made in part according to political benefit for the Comptroller, rather than exclusively in the best interests of the people. The political motivations for investment selection were chronic and institutionalized throughout the office, creating a culture of corruption at the highest levels.

When I joined the office, I learned that Henry “Hank” Morris was the paid political advisor and campaign manager for Comptroller Hevesi and also a registered placement agent with respect to certain investments from the Common Retirement Fund. Early on, a senior OSC official instructed me that Morris’s approval was required before I could recommend or decline certain proposed alternative investments by the Common Retirement Fund. At the direction of senior OSC officials, at times, I effectively ceded my authority over the alternative investment portfolio to Morris.

Morris corrupted the investment process to favor those who either made contributions to the Comptroller’s campaign, which Morris managed, or agreed to pay placement or other fees to Morris or his associates, and to punish those who would not.

Because Morris was the chief political consultant and campaign fundraiser for the Comptroller, his control over the alternative investment portfolio positioned him to extract campaign contributions from those doing and seeking to do business with the CRF, and to reward campaign contributors with investments, which he did.

With the full knowledge, acquiescence, and participation of senior OSC officials, and at times myself, Morris ensured that investment decisions were made to financially benefit himself and third parties through sham placement arrangements, to reward political cronies and friends of Morris and the senior officials, to reward the Comptroller’s campaign contributors, and to create opportunities to solicit contributions for the Comptroller’s campaign.

With respect to some investments, I understood that Morris was a secret partner of Barrett Wissman, Julio Ramirez, and others pursuant to which Morris split sham

placement fees or had other financial interests which Morris concealed from the Common Retirement Fund. In other instances, Morris concealed even from me that he was receiving fees on transactions, such as the GKM investment transaction.

In sum, I understood and did not disclose that Morris played three conflicting roles: he was the paid outside political consultant to the sole trustee; he had a financial interest in multiple proposed alternative investments; and he had authority over investment decisions, including with respect to deals in which he had a financial interest.

In addition, while I was still employed by the Office of the New York State Comptroller, I destroyed certain disclosure letters that identified fees paid in connection with alternative investments. I did so to conceal fees paid to Morris, Wissman, and their favored associates, including during times while I understood that the Office of the Attorney General was conducting an investigation into this matter.

Through this scheme, from in or about January 2003 through in or about December 2006, acting in concert with Hank Morris and other senior Office of the New York State Comptroller officials, I violated my fiduciary and other duties and intentionally engaged in fraud, deception, concealment, suppression, and made false representations of material facts and concealed material information with intent to deceive and defraud, while engaged in inducing and promoting the exchange, sale, negotiation and purchase within and from New York of securities, including but not limited to, direct and indirect New York State Common Retirement Fund investments in Carlyle/Riverstone and other funds listed in the indictment.

As a result of my actions, I was promoted to and maintained my position as Chief Investment Officer of the New York State Common Retirement Fund, and Hank Morris and others wrongfully obtained millions of dollars worth of agreements and fees relating to these transactions.