

Chronology of Internal Control Lapses at the World Bank Exhibit 3

Date	Event
3/17/00	Ms. Hudes, Senior Counsel in the Legal Department of the World Bank, advised Vinay Bhargava, Country Director for the Philippines, to inform Government of the Philippines that the World Bank could not disburse the second and third tranches of the Banking Sector Reform Loan. Ms. Hudes wrote a draft letter to be sent to Mr. Pardo, Secretary Department of Finance, explaining that the investment advisors had cautioned that the conditionality requiring the transparent sale of a controlling interest in Philippine National Bank (the second largest bank in the Philippines) to a strategic private investor could no longer be met after Lucio Tan's purchase of PNB shares. An article in the Business World appeared on that date entitled "PNB sell-off controversy no longer a condition for bank sector reform loan." Lucio Tan owned Philippine Airlines, a major borrower of PNB's
6/6/00	Ms. Hudes reiterated her advice to Vinay Bhargava and Hemant Shah that the loan conditionality in the BSRL was not met
6/15/00	Vinay Bhargava requested Mohan Gopal to reassign Ms. Hudes from working on the Philippines portfolio
6/28/00	Jemal-ud-din Kassum, Vice President for East Asia Region, overruled Vinay Bhargava's recommendation to disburse second tranche of the Banking Sector Reform Loan, following Ms. Hudes' advice that a waiver from the Board was needed for the tranche release conditionality, which had not been met.
9/1/00	Ms. Hudes reported misconduct of Mohan Gopal to Ms. Anita Baker, Ethics Officer. Mr. Gopal wrongfully refused to exonerate Ms. Hudes after Mr. Gopal erroneously reported to senior management in the Legal Department that there was an ongoing investigation in the Ethics Office. The investigation had been called off months earlier because Ms. Hudes' Statement of Expenditure did not have any significant discrepancies, all of which had been fully disclosed. Mr. Gopal was placed on mandatory administrative leave the following month.
9/28/00	Ms. Hudes protested being reassigned from the Philippines. In an email to Douglas Webb (manager in the Legal Department) Ms. Hudes stated that the Legal Department cannot fulfill its mandate if its lawyers have to worry about reassignment for taking an independent position.

- 10/00 The Government of the Philippines loaned \$493 million to PNB after depositors made heavy withdrawals.
- 11/15/00 Ms. Hudes was placed on a performance improvement plan based upon Mr. Gopal's retaliatory Overall Performance Evaluation (OPE).
- 6/30/01 The Philippines Banking Sector Reform Loan was cancelled without disbursement of the second and third tranches aggregating \$200 million; the \$200 million undisbursed balance of the Japan Eximbank cofinancing was also cancelled.
- 12/6/01 In a meeting with James Wolfensohn and Pieter Stek, the Executive Director (ED) for the Netherlands, Ms. Hudes informed James Wolfensohn about the Philippines Banking Sector Reform Loan. During the meeting James Wolfensohn said that Wilmer, Cutler and Pickering, the Bank's outside counsel, should investigate the BSRL; instead James Wolfensohn told Ko-yung Tung, General Counsel, that Ms. Hudes had reported to him that she was being retaliated against. Apparently Mr. Wolfensohn failed to raise the BSRL with Wilmer, Cutler and Pickering.
- 7/10/02 Jacquelyn Gates, Ethics Officer after Ms. Baker, advised Kathy Sierra, VP Human Resources, to intervene to end the retaliation by the Legal Department, but Kathy Sierra refused
- 11/25/02 Ms. Hudes requested the Evaluation Department to revise the Bank's satisfactory rating in the Implementation Completion Report for Bank supervision of the Philippines Banking Sector Reform Loan.
- 12/13/02 Ms. Hudes sent email to James Wolfensohn informing him that INT had not opened an investigation although this had been requested by Jacquelyn Gates, Ethics Officer, and that the Evaluation Department had refused to correct its inaccurate report to the Board on Bank performance on the BSRL.
- 1/8/03 INT refused to honor Jacquelyn Gates' 10/31/02 request for an investigation into whether Ms. Hudes had been retaliated against, stating that it had no jurisdiction because allegations of wrongdoing were made to INT after the retaliation had occurred. There was no response to Ms. Hudes' argument that previous allegations of Mr. Gopal's misconduct to the Ethics Office on 6/26/00, 9/1/00 and to management of the Legal Department on 8/8/00 fell within the definition of retaliation in the World Bank's Staff Rule 8.01. This Staff Rule was later revised on June 10, 2008 to incorporate an explicit whistleblower policy. The policy did not follow the requirement for access to external arbitration mandated under US appropriations legislation. Its weak provision for independent investigations was not observed in Ms.

Hudes' case. The external reviewer was appointed by the Ethics office although the Ethics office was implicated in Ms. Hudes' case. The Ethics office permitted Mr. Gopal to give Ms. Hudes a retaliatory evaluation on the eve of his departure from the Bank on mandatory administrative leave after Ms. Hudes' report of Mr. Gopal's misconduct. The Ethics office also permitted tampered documentation concealing Ms. Hudes' illegal separation from the Bank to be used in the Bank's conflict resolution system. The Ethics office also permitted the Bank's health office to contact Ms. Hudes' physicians without her consent. The external reviewer ignored four letters from the US Congress requesting a review and report and held that Ms. Hudes was not a whistleblower in an evident device to avoid application of the ineffectual whistleblower regime in the World Bank. Ms. Hudes was counseled by one of the World Bank's Ethics Officers and the Deputy General Counsel of the IMF that the World Bank's whistleblower regime was ineffectual.

- 2/28/03 Ms. Hudes sent the Implementation Completion Report for the Philippines Banking Sector Reform Loan and her comments thereon to William Holder, Deputy General Counsel of the IMF. The IMF was involved with the Philippines Banking Sector. Mr. Holder confirmed Ms. Hudes' analysis of what had happened on the BSRL, but advised her to drop the matter because it would be difficult for her to prevail. Instead on March 4, 2003 he sent a reference to Pat Neill and Elizabeth Adu, "I regard Ms. Hudes as a distinguished professional whose substantial contribution in the field over many years deserves recognition."
- 3/20/03 Todd Crawford of US ED's office sent email that Jacquelyn Gates' decision to resign from the Bank was "made as a result of considerable frustration." Bob Holland, U.S. Alternate, and Todd Crawford "came away from our meeting [with Jacquelyn Gates] with certain concerns that we have shared with both the Audit Committee and senior management."
- 10/2/03 Ms. Hudes discussed World Bank compliance issues with Jacquelyn Gates and Anita Baker at Annual Conference of the Ethics and Compliance Officer Association held in Orlando, Florida
- 6/2/04 Ms. Hudes requested the Audit Committee to look into lapses in the Bank's internal control system on the Philippines Banking Sector Reform Loan.
- 6/4/04 Elizabeth Adu, Deputy General Counsel, sent a letter informing Ms. Hudes that she violated the policy on communications with EDs, whereby correspondence from staff on business issues is routed through the VP and not directly to the EDs.
- 11/16/04 Ms. Hudes was placed on a Performance Improvement Plan for a trip to Nigeria which was approved under normal Bank procedures.

- 1/13/05 Mr. Robert-Jan Sieben of Netherlands Ministry of Foreign Affairs confirmed Pieter Stek's meeting of 12/6/01 with Mr. Wolfensohn and Ms. Hudes, and stated: "We feel that your allegations should be put on the agenda of the Bank's Audit Committee and be discussed there. We requested our constituency office to be represented at such a meeting."
- 11/2/05 INT's Report to Audit Committee concluding that Ms. Hudes was not a whistleblower and was not subjected to retaliation, based upon 10/31/05 report of Douglas Herbert, consultant appointed by the INT, which obfuscated the issues by focusing on the Nigeria Micro Small and Medium Enterprise Project rather than the Philippines BSRL. The single issue on the MSME Project raised by Ms. Hudes for the Audit Committee was whether the Board was misled during its 12/16/03 discussion concerning ownership of the Nigerian Government for the design of that Project.
- 11/4/05 Administrative Tribunal held that the Legal VPU failed to follow the procedural requirements of the Staff Rules, defaming Ms. Hudes in the process by publishing Mr. Gopal's spurious allegations of fraud and his retaliatory evaluation.
- 1/26/06 Memorandum of Understanding was signed, but the MOU was breached on February 3, 2006 when Mr. Freestone, her new supervisor, was included in a Management Review Group that referred to the Performance Improvement Plan in confirming Ms. Hudes' 2005 OPE. The Legal Vice Presidency used white-out to obscure the Management Review Group's breach of the MOU in its submission to the Administrative Tribunal. Mr. Freestone reassigned and cancelled projects that Ms. Hudes task managed, canceled her supervision missions, and prevented other projects from being approved. He also obstructed Ms. Hudes' transfer to other departments by calling said departments to make negative remarks and by undermining the proposed global partnership on rule of law.
- 5/8/06 Denise Grant of Russell Reynolds interviewed Ms. Hudes for the General Counsel position. During that interview, Ms. Hudes provided Ms. Grant with the recommendation of William Holder, Deputy General Counsel of the IMF. Pieter Stek was former Chair of the Board's Committees for Audit and Development Effectiveness, and Executive Director of the Netherlands Constituency. His affidavit on Ms. Hudes' case in the Administrative Tribunal was also provided: "In a multilateral institution which should be governed by the rule of law and high standards of probity the charge of concealment from the Board of Executive Directors of information relevant to the exercise of its duty of supervising management and the persecution of the person who brings this to light is extremely serious. If correct, which I believe, this poisonous cocktail undermines good governance and ultimately the effectiveness of the Bank in fulfilling its mandate. I shall continue to assist Ms. Hudes in her efforts to have due process brought to bear, preferably by the Bank itself, on these issues of

governance.”

- 1/11/07 The President and Executive Director of the American Bar Association met with Ms. Hudes concerning a global partnership on rule of law under the Bank’s Global Partnership Program; Sweden’s International Legal Assistance Consortium and Holland’s Center for International Legal Cooperation agreed to collaborate with the ABA on February 1, 2007.
- 2/8/07 and 2/9/07 Ms. Hudes advised Messrs. Eckhard Deutscher, German Executive Director and Dean of the Board; and Svein Aass, Nordic Executive Director and Chair of the Committee on Governance, that the global partnership on rule of law was being sabotaged.
- 2/16/07 Ms. Hudes advised Mr. La Via, the Bank’s Chief Financial Officer, that his refusal to provide Russell Reynolds’ report to Ana Palacio, the Bank’s General Counsel, on grounds of confidentiality, was incorrect. “Under the Bank’s COSO (auditing) Framework, those aspects of the Russell Reynolds report which concern this matter of corporate governance are required to be fully disclosed so that ongoing internal control lapses can be properly resolved.”
- 2/23/07 Ms. Robin Cleveland, Counsellor to Mr. Wolfowitz, sent email to Ms. Hudes, copied to Ms. Palacio, refusing to engage on outstanding governance issues, stating: “I am copying your managers on this email in order to have them address the matters with you as appropriate.”
- 3/1/07 Mr. Freestone informed Ms. Hudes that she had not been keeping him informed of projects that she was pursuing, and that additional instances may result in summary dismissal.
- 3/8/07-4/11/07 Meetings with Nilmini Rubin, Jay Branegan and James Greene, Senate Foreign Relations Committee, regarding internal control lapses within the Bank
- 5/21-6/8/07 Ms. Hudes sent emails to Patrick Grasso, Independent Evaluation Group, requesting end to the cover-up on the Philippines Banking Sector Reform Loan.
- 5/10-6/22/06 Ms. Hudes sent emails to Graeme Wheeler, Managing Director, requesting end to cover-up and retaliation as well as compliance with Senate Foreign Relations Committee request for documentation.
- 6/15/07 Ms. Hudes sent email to Dean of Board, Chair of Board Committee on Governance and ED’s Administrative Matters; Audit Committee; Personnel Committee; Ethics Committee; and Committee on Development Effectiveness (“CODE”), copied to US ED and Alternate EDs concerning

whistleblower retaliation, and an end to the cover-up.

- 7/6/07 Memorandum to Mr. Robert Zoellick, requesting his support for Ms. Hudes' transfer out of Legal Department and an end to retaliation.
- 7/10/07 Email from Cathy Cardona, Manager Human Resources, refusing to comply with Keith Luse's request to provide the President of the Bank with a transcript of Denise Grant's briefing on Ms. Hudes' candidacy for General Counsel.
- 7/12/07 Email to Jiayi Zou, copied to members of Board CODE, requesting interim protection for whistleblowers, and end to cover-up on Philippines BSRL, followed up by meeting on July 13, 2007.
- 7/23/07 Meeting with Robert Zoellick and the Legal Vice Presidency. Ms. Hudes asked Mr. Zoellick how he expected to get a clean audit of the Bank's internal controls, and Mr. Zoellick asked if there were a Sarbanes-Oxley problem in the Bank. When Ms. Hudes informed Mr. Zoellick that this was indeed the case, Mr. Zoellick asked her to help correct the internal control lapses. Mr. Zoellick's office later referred the matter back to Ms. Ana Palacio, the Bank's General Counsel.
- 7/25/07 Ms. Hudes advised Mr. Mitchell, Head of Development Communications Unit in EXT, that Ms. Palacio was trying to sabotage Ms. Hudes' transfer to EXT.
- 7/26/06 Ms. Hudes asked Mr. Zoellick to permit her to transfer to EXT in order to work on the global partnership for rule of law.
- 7/27/07 Meeting with Mr. Sven Aass, Executive Director for the Nordic Countries. Mr. Paul Volcker updated the Board on 7/23/07 on the investigation of INT that did not address INT's independence or integrity issues.
- 7/30/07 Ms. Hudes asked Whitney Debevoise, Executive Director, to provide whistleblower protection by informing the head of the Bank's mediation office, Ms. Deborah Laufer, that Ms. Hudes was about to transfer from the Legal Vice Presidency to the Development Communications unit of EXT.
- 8/2/07 Ms. Hudes denied access to the Main Complex when the Security Office improperly refused to issue her retiree ID card. The ID card was subsequently issued on 9/14/07. After the Board requested Ms. Hudes' reinstatement on 8/20/09, the retiree ID card was revoked again without cause.
- 4/17/08 Senators Richard Lugar, Patrick Leahy, and Evan Bayh requested the US

Government Accountability Office to carry out a study to assess whether the World Bank's criteria for measuring the success of its projects are ensuring the effective use of public funds, and whether Bank programs are being hampered by internal resistance to increased transparency and accountability.

- 10/10/08 Letter from France's Ambassador, Pierre Vimont, "I have received a copy of your remarks on World Bank governance and I thank you for this transmission. But as I am not competent on such issues, I can only forward your memorandum to Ambroise Fayolle and his staff."
- 10/21/08 Letter from Canada's Ambassador, Michael Wilson, "I note that you have kept the Canadian Executive Director's office informed of developments. The Executive Director's office is the appropriate responsibility center for keeping Canada informed of this matter."
- 11/3/08 Letter from Australia's Ambassador, Dennis Richardson, "I am informed that the Australian Executive Director to the World Bank, Dr Jim Hagan, is aware of your concerns and is considering the best way to proceed with the issues raised in your correspondence."
- 11/17/08 On 9/8/08 Mr. Chris Van Hollen, Congressman, wrote to Ms. Hudes, "Your letter to Speaker Pelosi regarding your termination from the World Bank was forwarded to me because I am the Member of Congress representing Maryland's Eighth Congressional District, in which you reside." Letter from Mr. Van Hollen to the World Bank requesting a review and report concerning Ms. Hudes' relationship with the World Bank.
- 2/28/09 In a meeting Ms. Hudes requested A. Almofadhi, chair of the Board's Audit Committee, to require an external audit of IBRD's internal control over financial reporting.
- 6/8/09 Ms. Hudes discussed internal control lapses on Philippines Banking Sector Reform Loan with M. Hasan, chair of the Board's Ethics Committee.
- 6/9/09 Audit Committee appointed KPMG to audit IBRD's internal control over financial reporting.
- 8/6/09 Ms. Hudes sent S. Aass, chair of the Board's Committee on Governance and Administration, an email: "The Board was never informed of the World Bank's failed supervision on the Philippines Banking Sector Reform Loan. I was fired in retaliation for trying to preserve the authority of the Board under the Articles of Agreement. HRS has misinformed the US authorities about the terms of my illegal separation from the World Bank. The Board has never considered INT's or the Office of Ethics and Business Conduct's role in perpetuating the cover-up to the Board of Executive

Directors. EBC is now violating the Bank's whistleblower policy by conducting a review of its own malfeasance. The World Bank's conflict resolution system is unable to resolve these corporate governance issues involving the mandate of the Board of Executive Directors. Staff are too intimidated to report misconduct after I was fired illegally. I attach relevant documentation and would appreciate your assistance in bringing these issues before COGAM for proper resolution."

- 8/20/09 Mr. Aass met with Ms. Hudes and reinstated her as an Advisor to the High Level Commission on World Bank Governance and Acting General Counsel. Mr. E. Miagkov met with Ms. Hudes and concurred with this decision on behalf of A. Kvasov, Dean of the Board.
- 8/25/09 Ms. Hudes sent an email to Messrs. Aass and Miagkov that she had emailed the High Level Commission on World Bank Governance: "During a meeting on August 20th, Mr. Aass informed me that he took the view as Chair of COGAM that the Board's mandate needs to return to the original powers set out in the World Bank's Articles of Agreement in order to address outstanding governance problems, and that the 1947 memorandum circumscribing the Board's authority to take the initiative was no longer appropriate. It is my understanding that Mr. Miagkov supports this view as well."
- 9/2/09 The World Bank barred Ms. Hudes from entering its headquarters buildings.
- 10/13/09 Ms. Hudes commenced litigation against IBRD for violation of the US securities laws in IBRD's retaliation against Ms. Hudes when she informed the US Congress of corporate governance irregularities at IBRD. After KPMG failed to follow Generally Accepted Accounting Standards in auditing IBRD's internal control over financial reporting, on 8/26/10, Ms. Hudes joined KPMG in the lawsuit.
- 12/10/09 Letter from Susanna Moorehead, UK Executive Director, in response to Ms. Hudes' letter to Ambassador Sheinwald: "In Mr. Paulssen's unilateral decision to suspend the [World Bank Administrative Tribunal] proceedings on my case, he has allowed the [Ethics and Business Conduct office] to complete an *ultra vires* investigation designed to discredit me in violation of the World Bank's whistleblower policy. This undermines the World Bank's ethics, the mandate of the Board of Executive Directors, and the right of World Bank staff to report securities law violations and corruption without fear of retaliation." Ms. Moorehead responded, "I have noted the contents of your letter and attachments."
- 2/2/10 Ms. Hudes advised Jason Waskey, Maryland Director of President Obama's Organizing for America, "I have been working with the Maryland Delegation in Congress on some issues." Jason emailed in response on

March 2, "I just wanted to let you know that I've sent your packet on to the appropriate people, and am waiting to hear back." In a phone conversation on March 9th, Jason advised Ms. Hudes that bipartisan support on rule of law at the World Bank would be welcome.

- 3/10/10 Senator Lugar issued a report, The International Financial Institutions: A Call for Change A Report to the Committee on Foreign Relations, http://www.foreignpolicy.com/files/fp_uploaded_images/int_fin_inst2.pdf On page 24 of the report, Senator Lugar revealed that GAO had stated in March 2009 that it could not carry out the study requested by Senator Lugar to determine whether IBRD programs are being hampered by internal resistance to increased transparency and accountability "because of challenges we recently faced in gaining access to World Bank officials."
- 5/27/10 Ms. Hudes informed the US National Advisory Council on International Monetary and Financial Policies consisting of the Secretaries of the Treasury, State Department, Commerce, Chairmen of Board of Governors of the Federal Reserve System, US Export Import Bank, and SEC, Administrator of US Agency for International Development and US Trade Representative that: "The Senate and House of Representatives intended to protect persons who assist the legislature in oversight of the International Bank for Reconstruction and Development against retaliation, and the employee protection provisions of Title VIII of the Sarbanes-Oxley Act of 2002, Section 806, repealed in part IBRD's temporary exemption from the US securities laws."
- 7/30/10 Letter from Jean-Louis Rioda, Acting Head of EC's Anti-Fraud Office, OLAF: "I hereby acknowledge receipt of your correspondence received on 18/05/2010 in which you provide OLAF with information regarding 'the impaired ethics and legal functions in the World Bank'. The information has been evaluated, but unfortunately the European Anti-fraud Office (OLAF) is not competent in this matter."
- 9/1/10 Ms. Hudes informed the National Advisory Council that KPMG failed to comply with Generally Accepted Auditing Standards in conducting the audit of IBRD's internal control over financial reporting commissioned by IBRD's Audit Committee. The NAC has authority to remove IBRD's temporary exemption from the US Securities laws.
- 9/15/10 In hearings on the World Bank's capital increase, the Senate Committee on Foreign Relations stated that the GAO inquiry into transparency at the World Bank had to be completed and necessary reforms in place before appropriated funds for a capital increase would be disbursed. <http://foreign.senate.gov/hearings/hearing/?id=33c66777-5056-a032-525a-a0a5806634e9>

- 9/28/10 Ms. Hudes discussed IBRD's internal control lapses in a meeting with Barry Collins, Principal Intelligence Officer of the UK's Serious Fraud Office, but the U.S. Securities and Exchange Commission declined to provide any information to the SFO on 10/12/10 when Mr. Collins called Mr. Arevalo, Assistant Director, Enforcement Matters, Office of International Affairs, to follow up.
- 11/28/10 Ms. Hudes reported to Carlos Braga, Acting Executive Secretary of the Joint Ministerial Committee of the Boards of Governors of the Bank and the Fund On the Transfer of Real Resources to Developing Countries, that "the Board of Governors is required to fulfill its mandate under the Articles of Agreement in order to provide strategic guidance and shareholder oversight when information is concealed from the Board of Executive Directors and this will impair IBRD's access to the capital markets."
- 12/2/10 Ms. Hudes followed up with a letter to the Board of Governors that "it is necessary for the Board of Governors of the World Bank to provide strategic guidance and shareholder oversight when information is concealed from the Board of Executive Directors. The President, officers and staff of the International Bank for Reconstruction and Development, in the discharge of their offices, owe their duty entirely to the Bank and to no other authority."

List of Acronyms and Bodies

ABA	The American Bar Association, a professional organization of lawyers
Audit Committee	A standing committee of the World Bank's Board of Executive Directors established to assist the Board in oversight of the World Bank's finances, accounting, risk management and internal controls
Board of Governors	Each of the World Bank's 187 member countries is represented on the Board of Governors by a government official, usually its Minister of Finance or Minister of Development. Under the Articles of Agreement, all powers of the IBRD are vested in the Board of Governors
BSRL	Banking Sector Reform Loan, \$300 million loan from the World Bank for reform of the financial sector in the Philippines following the East Asia financial crisis, with a matching \$300 million loan from Japan.
CODE	Board of Executive Directors Committee on Development Effectiveness
COGAM	Committee on Governance and Executive Directors' Administrative Matters, a standing committee established to assist the World Bank's Board of Executive Directors on issues related to the governance of the institutions of the World Bank Group, the Boards' own effectiveness, and the administrative policy applicable to Executive Directors' offices
COSO	Committee of Sponsoring Organizations of the Treadway Commission (the US accounting regime, less stringent than the Generally Accepted Accounting Principles and Standards normally applied on the capital markets)
Development Committee	Joint Ministerial Committee of the Boards of Governors of the Bank and the Fund On the Transfer of Real Resources to Developing Countries, a forum of the World Bank and the International Monetary Fund established in 1974 to facilitate intergovernmental consensus-building on development issues
ED	Executive Director
Ethics Office	Office of Ethics and Business Conduct
EXT	World Bank's External Affairs, or public relations department

GAO	US Government Accountability Office, Congress' auditors
HR	Human Resources
High Level Commission on World Bank Governance	Commission appointed by Robert Zoellick, President of the World Bank, chaired by former Mexican President Ernesto Zedillo, which recommended controversial reforms in the World Bank's Governance in October 2009, including elimination of the Board of Executive Directors of the World Bank. Germany's representative resigned from the High Level Commission.
IBRD	International Bank for Reconstruction and Development. The original institution established at the Bretton Woods Conference, which makes loans to middle-income countries for financing of development projects, or to provide quick-disbursing loans for policy lending with conditionalities
ID	Identification card
IMF	International Monetary Fund
INT	Institutional Integrity Department, the World Bank's anti-fraud agency. The abuses of INT are now public knowledge. http://www.whistleblower.org/press/press-release-archive/484-bar-complaintcharges-former-world-bank-official-with-ethics-violations
KPMG	An audit, tax and advisory firm
MoU	Memorandum of Understanding
MSME	Micro Small and Medium Enterprise
NAC	US National Advisory Council on International Monetary and Financial Policies consisting of the Secretaries of the Treasury, State Department, Commerce, Chairmen of Board of Governors of the Federal Reserve System, US Export Import Bank, and SEC, Administrator of US AID and US Trade Representative
OLAF	Office Lutte Anti-Fraude, the European Union's anti-fraud office
OPE	Overall Performance Evaluation
PIP	Performance Improvement Plan

PNB	Philippines National Bank
Sarbanes-Oxley	Securities legislation enacted after Enron to strengthen corporate governance and provide greater information to shareholders on capital markets
SEC	Securities and Exchange Commission, the US regulatory agency that oversees the stock markets
SFO	Serious Fraud Office, the UK anti-fraud agency
Staff Rule 8.01	Staff Rule on Disciplinary Proceedings. Section 2.03 prohibits retaliation against any person who in good faith provides information about suspected misconduct.
VPU	Vice Presidency Unit
Wilmer, Cutler and Pickering	Outside counsel to the World Bank in 2000

Persons

Svein Aass	Nordic Executive Director and Chair of the World Bank Board's COGAM
Elizabeth Adu	Deputy General Counsel of the World
A. Almofadhi	Chair of the Board's Audit Committee
Mr. Arevalo	SEC's Assistant Director, Enforcement Matters, Office of International Affairs
Anita Baker	Ethics Officer, received a report of misconduct of Mohan Gopal by Ms. Hudes on 1 September 2000; succeeded by Ms. Gates, Ms. Borrero, and later Ms. Taylor
Evan Bayh	US Senator
Vinay Bhargava	Country Director for the Philippines
Carlos Braga	Acting Executive Secretary of the Development Committee (Joint Ministerial Committee of the Boards of Governors of the Bank and the Fund On the Transfer of Real Resources to Developing Countries), replaced by Jorge Familiar, former ED for Mexico
Jay Branegan	Staffmember on the US Senate Foreign Relations Committee
Cathy Cardona	Manager Human Resources, refused to comply with Keith Luse's request to provide the President of the Bank with a transcript of Denise Grant's briefing on Ms. Hudes' candidacy for General Counsel
Ms. Robin Cleveland	Counsellor to Mr. Wolfowitz
Barry Collins	Principal Intelligence Officer of the UK's Serious Fraud Office
Todd Crawford	Official at the US Executive Director's office, sent email that Jacquelyn Gates' decision to resign from the Bank was "made as a result of considerable frustration."
Whitney Debevoise	Executive Director for the US
Eckhard Deutscher	Executive Director for Germany, Dean of the Board
Jorge Familiar	former ED for Mexico, replaced Carlos Braga as Executive Secretary for Development Committee following Ms. Hudes' letter to Board of Governors,
Ambroise Fayolle	France's ED
Mr. Freestone	New supervisor of Ms. Hudes,, was included in a Management Review Group
Jacquelyn Gates	Ethics Officer after Ms. Baker
Mohan Gopal	Boss of Ms. Hudes , asked by Mr. Bhargava to reassign Ms. Hudes from working on the Philippines portfolio
Denise Grant	Worked at Russell Reynolds, interviewed Ms. Hudes for the General Counsel position
Patrick Grasso	Staffmember of the Independent Evaluation Group
James Greene	Staffmember on the US Senate Foreign Relations Committee
Jim Hagan	The Australian Executive Director to the World Bank
Douglas Herbert	Consultant appointed by the INT
William Holder	Deputy General Counsel of the IMF
Bob Holland	U.S. Alternate Executive Director

Karen Hudes	Senior Counsel in World Bank's Legal Department for 20 years, reinstated on 8/21/09 by decision of S. Aass and E. Miagkov as legal advisor to the High Level Commission on World Bank Governance and Administrative Matters ("COGAM") and Acting General Counsel and barred from World Bank's headquarters the following week
Jemal-ud-din Kassum	Vice President for East Asia Region
A. Kvasov	Dean of the World Bank's Board of Executive Directors
Deborah Laufer	Head of the Bank's mediation office
Patrick Leahy	Senator
Richard Lugar	Most senior Republican Senator, former chair of the Senate Committee on Foreign Relations, author of the report, "The International Financial Institutions: A Call for Change. A Report to the Committee on Foreign Relations United States Senate"
Keith Luse	Senator Lugar's staffmember on the Senate Committee on Foreign Relations. Requested Ms. Cardona to provide the President of the Bank with a transcript of Denise Grant's briefing on Ms. Hudes' candidacy for General Counsel
Eugene Miagkov	Alternate Executive Director for Russia
Mr. Mitchell	Head of Development Communications Unit in EXT, was informed by Ms. Hudes that Ms. Palacio was trying to sabotage Ms. Hudes' transfer to EXT
Susanna Moorehead	UK Executive Director
Pat Neill	A manager in the Human Resources Department
Ana Palacio	The Bank's former General Counsel. Tried to sabotage Ms. Hudes' transfer to EXT
Mr. Pardo	Secretary Philippines Department of Finance
Dennis Richardson	Australia's Ambassador
Jean-Louis Rioda	Acting Head of unit of the European Commission's Anti-Fraud Office, OLAF
Nilmini Rubin	Staffmember on the US Senate Foreign Relations Committee
Hemant Shah	Task team leader on the BSRL
Sheinwald	UK's Ambassador to US
Robert-Jan Sieben	Official at the Dutch Ministry of Foreign Affairs
Kathy Sierra	Vice President Human Resources, advised by Ethics Officer Ms. Gates to intervene to end the retaliation by the Legal Department, but she refused
Pieter Stek	former Chair of the Board's Committees for Audit and Development Effectiveness, and Executive Director of the Netherlands Constituency
Lucio Tan	Owner of Philippine Airlines, a major borrower of PNB, who purchased PNB shares
Ko-yung Tung	former General Counsel
Chris Van Hollen	Member of Congress representing Maryland's Eighth Congressional District, in which Karen Hudes resided

Pierre Vimont	France's ambassador (now deputy secretary general of the EU's foreign affairs branch)
Jason Waskey	Maryland Director of President Obama's Organizing for America
Douglas Webb	Manager in the Legal Department where Ms. Hudes worked
Graeme Wheeler	Managing Director of World Bank
Michael Wilson	Canada's Ambassador
James Wolfensohn	Former President of the World Bank
Robert Zoellick	President of the World Bank
Jiayi Zou	ED for China, Chair of CODE , addressee of a request for interim protection for whistleblowers and an end to cover-up on Philippines BSRL

- * -

Governance World Bank

The World Bank is like a cooperative, where its 187 member countries are shareholders. The shareholders are represented by a Board of Governors, who are the ultimate policy makers at the World Bank. Generally, the governors are member countries' ministers of finance or ministers of development. They meet once a year at the Annual Meetings of the Boards of Governors of the World Bank Group and the International Monetary Fund.

Because the governors only meet annually, they delegate specific duties to 25 Executive Directors, who work on-site at the Bank. The five largest shareholders, France, Germany, Japan, the United Kingdom and the United States appoint an executive director, while other member countries are represented by 20 executive directors.

- The President of the World Bank, Robert B. Zoellick, chairs meetings of the Boards of Directors and is responsible for overall management of the Bank. By tradition, the Bank president is a U.S. national and is nominated by the United States, the Bank's largest shareholder. The President is selected by the Board of Executive Directors for a five-year, renewable term.
- The Executive Directors make up the Boards of Directors of the World Bank. They normally meet at least twice a week to oversee the Bank's business, including approval of loans and guarantees, new policies, the administrative budget, country assistance strategies and borrowing and financial decisions.

About 6,000 employees work at the World Bank's headquarters in Washington D.C. and an additional 4,000 work in more than 100 offices in the World Bank's other member countries.