

1 Occidental, and ExxonMobil.¹⁸

2 e. **The American Fuel and Petrochemical Manufacturers (AFPM)** is a
3 national association of petroleum and petrochemical companies. At relevant times, its members
4 included, but were not limited to, BP Petrochemicals, BP Products North America, Chevron
5 U.S.A. Inc., CITGO Petroleum Corporation, Exxon Mobil Corporation, Occidental Chemical
6 Corporation, Phillips 66, Shell Chemical Company, and Total Petrochemicals & Refining USA,
7 Inc.¹⁹

8 f. **The Information Council for the Environment (ICE)**: ICE was formed
9 by coal companies and their allies, including Western Fuels Association and the National Coal
10 Association. Associated companies included Peabody, Pittsburg and Midway Coal Mining
11 (Chevron),²⁰ and Island Creek Coal Company (Occidental).

12 g. **The Global Climate Coalition (GCC)**: GCC was an industry group formed
13 to oppose greenhouse gas emission reduction policies and the Kyoto Protocol. It was founded in
14 1989 shortly after the first Intergovernmental Panel on Climate Change meeting was held, and
15 disbanded in 2001. Founding members included the National Association of Manufacturers, the
16 National Coal Association, the Edison Electric Institute, and the United States Chamber of
17 Commerce. The GCC's early individual corporate members included Amoco (BP), API, Chevron,
18 Exxon, Ford, Shell Oil, Texaco (Chevron) and Phillips Petroleum (ConocoPhillips). Over its
19 existence other members and funders included ARCO (BP), BHP, the National Mining
20 Association, and the Western Fuels Association. The coalition also operated for several years out
21 of the National Association of Manufacturers' offices.

22 **III. AGENCY**

23 40. At all times herein mentioned, each of the Defendants was the agent, servant,
24 partner, aider and abettor, co-conspirator, and/or joint venturer of each of the remaining
25 Defendants herein and was at all times operating and acting within the purpose and scope of said
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27 ¹⁸ WSPA, Member List, <https://www.wspa.org/member-list> (as of June 1, 2017).

28 ¹⁹ AFPM, Membership Directory, <https://www.afpm.org/membership-directory/> (As of June 30, 2017).

²⁰ Hereinafter, parenthetical references to Defendants indicate corporate ancestry and/or affiliation.