



Sovereign Advisers[®]
Specialists in Risk Metrics Analytics

5631 East Baker Street
Tucson • Arizona • 85711

Tel (USA): 520.327.2482 • Fax: 520.322.9850
Email: info@sov-advisers.com
Website: <http://www.sov-advisers.com>

July 6, 2010

Mr. Jon Leibowitz, Chairman
Office of the Chairman
United States Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Re: Civil Racketeering Complaint Evidencing Regulatory Enforcement Failure
Affecting Interstate Commerce

Dear Mr. Leibowitz,

I am writing to you on behalf of the Starwood Trust, a revocable Arizona grantor trust representing the beneficial holders of approximately 248,000 gold loan bonds issued by the Government of China as full faith and credit sovereign obligations of the Chinese Government, which The People's Republic of China (the "PRC" or "China") refuses to repay in violation of international law. Several of the various series of bonds comprising the debt have been assigned International Securities Identification Numbers ("ISINs") and are listed and quoted on the NYSE Euronext Financial Exchange. The debt remains a valid, unpaid obligation of the PRC as the internationally recognized government of China.

The actions of certain third parties, which continue to willfully assist the PRC in escaping its repayment obligation, have the effect of the taking of rights in property from the defaulted creditors. I enclose a copy of a pre-filing draft of a civil racketeering complaint describing the injuries sustained by the defaulted creditors, including antitrust injury, caused primarily by the wrongful actions of the three primary credit rating agencies as a consequence of the publication and distribution of a demonstrably false sovereign credit rating for China which is published and distributed through various means of interstate commerce, including use of the wires, mails and telephonic conversations.¹ The three primary credit rating agencies continue to actively assist China in shedding its foreign debt obligation.

¹ The three primary credit rating agencies collectively comprise the for-profit companies of Standard & Poor's, Moody's Investors Service, and Fitch Ratings.

Mr. Jon Leibowitz, Chairman
July 6, 2010
Page Two

We contacted the Federal Trade Commission previously in regard to this matter in 2005 and received a response which referred us to the United States Securities and Exchange Commission (see copy of FTC letter dated July 15, 2005 enclosed with this correspondence). Upon contacting the SEC, we were informed that the SEC lacks subject matter jurisdiction over the actions of the three primary credit rating agencies (see copy of the SEC internal memorandum dated July 29, 2005 enclosed with this correspondence).² The fraudulent deceptive and injurious practices of the three primary credit rating agencies continue in effect unabated.

We request a formal investigation by the FTC into the allegations stated in the enclosed Complaint. Please note that both the Complaint and the Exhibits to the Complaint are accessible on the world wide web.³

Sincerely,

Kevin O'Brien, President

Enclosures: Civil Racketeering Complaint and Exhibits
Letter from the FTC dated July 15, 2005
SEC Memorandum dated July 29, 2005
Letter from the SEC Office of Market Intelligence dated June 14, 2010

cc: Steven Phillips, Esq., Phillips, Moeller & Conway, P.L.L.C.
Hon. Christopher J. Dodd, Chairman, Senate Committee on Banking, Housing,
and Urban Affairs

² The SEC has demonstrated an absolutely abject failure of enforcement in regard to the activities of the three primary credit rating agencies, as evidenced in a Congressional hearing accessible on the world wide web via the following URL: http://www.youtube.com/watch?v=FOKSkaQoF_I

³ The Complaint, and the Exhibits thereto, may be accessed online at the following URL:
<http://login.live.com/login.srf?wa=wsignin1.0&rpsnv=11&ct=1273695786&rver=5.5.4177.0&wp=MBI&wreply=http:%2F%2Fhome.officelive.com%2FSettings%2FPages%2Fchoosesubscription.aspx&lc=1033&id=66623&partner=OfficeLive>

{Alternatively, proceed to www.microsoft.com and place the cursor over the "Office" tab on the toolbar in the center of the webpage; click on the "Office Live" option; then click on the "Sign In" button on the webpage}

Enter the Windows Live I.D.: chinatortfeasorlitigation@ymail.com

Enter the Password: prefilingspreview

Mr. Jon Leibowitz, Chairman
July 6, 2010
Page Three

Hon. Jack Reed, Chairman, Senate Subcommittee on Securities, Insurance, and
Investment
Hon. John D. Rockefeller IV, Chairman, Senate Committee on Commerce,
Science, and Transportation
Hon. Carolyn B. Maloney, Chair, Joint Economic Committee
Hon. Henry A. Waxman, Chairman, House Committee on Energy and Commerce
Hon. Bobby Rush, Chairman, House Subcommittee on Commerce, Trade, and
Consumer Protection
Hon. Rick Boucher, Chairman, House Subcommittee on Communications,
Technology, and the Internet
Hon. Bart Stupak, Chairman, House Subcommittee on Oversight and
Investigations
Hon. Barney Frank, Chairman, House Committee on Financial Services
Hon. Paul Kanjorski, Chairman, House Subcommittee on Capital Markets,
Insurance, and Government Sponsored Enterprises
Hon. Dennis Moore, Chairman, House Subcommittee on Oversight and
Investigations
Willard K. Tom, General Counsel, United States Federal Trade Commission
{Various Print, Broadcast, and Internet News Media}