



U.S. Department of Justice  
Tax Division

Western Criminal Enforcement Section  
P.O. Box 972  
Washington, D.C. 20044

(v)  
(f)

August 6, 2018

John F. Libby, Esq.  
Manatt, Phelps, & Phillips, LLP  
11355 West Olympic Boulevard  
Los Angeles, California 90064

Re: Mizrahi-Tefahot Bank Limited

Dear Mr. Libby,

In furtherance of settlement negotiations concerning the U.S. Department of Justice's criminal investigation of Mizrahi-Tefahot Bank Limited and its subsidiaries Mizrahi Trust Company and United Mizrahi Bank of Switzerland, enclosed please find a draft Statement of Facts that serves as the basis for a Deferred Prosecution Agreement (DPA) in this case.

In addition, the Tax Division has authorized a settlement amount of Three Hundred Forty Two Million (\$342,000,000) as part of a DPA resolution in this case. This amount is based upon the current tally of United States related accounts (USRA) and may increase if a relevant number of USRA are added by way of POA accounts.

Lastly, please find enclosed a seventh tolling agreement that extends the Statute of Limitations in this investigation an additional three months from September 30, 2018 to December 31, 2018.

Thank you for your attention to this matter. The Tax Division looks forward to reaching a prompt negotiated settlement to this case.

Sincerely,

Larry J. Wszalek  
Chief  
Western Criminal Enforcement Section  
U.S. Department of Justice – Tax Division