
The Pebble Mine: *Lobbyists & Lies*

**A Payday for the Washington Swamp,
A Scam for Alaskans**

April 30, 2019





SUMMARY

Americans, and the majority of Alaskans, have said “NO” to the Pebble Mine over and over again. Polls and public comment periods repeatedly show the public values the sustainable fish and water resources of Bristol Bay over a giant gold and copper mine. A deep body of peer-reviewed science in the EPA’s Bristol Bay Watershed Assessment clearly demonstrates a mine like Pebble cannot co-exist with the region’s fish and water resources. To most Alaskans, the issue should be settled.

Yet the Pebble Limited Partnership sees a limited window of opportunity under the Trump Administration to bend and break the rules and to rapidly obtain permits for the controversial project. To achieve these goals, Pebble has offered an extraordinary bonus of up to \$12.5 million to its CEO Tom Collier if he is can get permits quickly, and it has spent \$4.34 million in lobbying the Trump Administration during the past two years to make it happen.

By greasing the skids with lobbying dollars, the Pebble Partnership secured a favorable settlement in its lawsuit with the Environmental Protection Agency (EPA) in May 2017. It also sought to undermine the Bristol Bay Watershed Assessment, which relied on rigorous, peer-reviewed science to conclude the Pebble mine poses serious risks to the fisheries of Bristol Bay.

Today, Pebble’s insider influence has resulted in an unusually rushed permitting process, with a Draft Environmental Impact Statement that accepts false premises (such as a twenty-year mine plan), and omits critical data about impacts to fish and water resources from mine operations and a tailings dam failure. Now, Pebble asks Alaskans and the American public to engage in the permitting process as if it were fair and transparent, when in fact it is neither.

While lobbying payouts and CEO bonuses are nothing new, it is clear Pebble has chosen to invest in these strategies to obtain an unfair advantage, and to ensure their interests rise above all else, including science, the rule of law and the public interest.

Bristol Bay tribes and residents, commercial and sport fishermen, and everyday Alaskans don’t have the same lobbying resources and insider access as corporations like Pebble and Northern Dynasty. Pebble’s aggressive lobbying and lobbyist spending is designed to ensure the people who will be left with the consequences of the Pebble Mine are ultimately left out of the process.

In the end, the Pebble Mine has been a payday for Washington DC lobbyists and a scam for Alaskans.

Pebble Mine Tops List of Lobbying Contracts

The proposed Pebble Mine is a project with plenty of superlatives - and Alaskans understand that. It would be the largest open pit mine in North America. It would be one of the largest and riskiest development projects in Alaska history. It would require a power plant large enough to power the city of Fairbanks. And it threatens the largest sockeye salmon fishery in the world, thousands of jobs and a \$12.5 billion commercial fishery.

In Washington, DC, Pebble is known for another reason. **Namely, Politico recently listed the Pebble Mine as the 7th largest source of lobbying contracts for a single project in 2018.** It likely employs more lobbyists than any other single mineral development project in the nation. While there is no guarantee the Pebble Mine project would create jobs for Alaskans, it is clear high-priced lobbyists in DC are already cashing in.

For calendar year 2018, the Pebble Mine enjoyed more than \$2.72 million in direct lobbying payments, and Politico listed Pebble's largest contract - with Akin Gump, Strauss, Hauer and Feld - as the 8th largest single lobbying contract in DC. Pebble also contracts directly with lobbyists at Van Ness Feldman, Squire Patton Boggs, and Gavel Resources. These firms also lobby on behalf of venture capital vultures like Bain Capital and special interest groups for Wall Street bankers, Big Pharma and Big Coal. Pebble has aligned itself with some of the darkest forces in Washington - and they are directly paying into the Washington swamp to try to push their project forward.



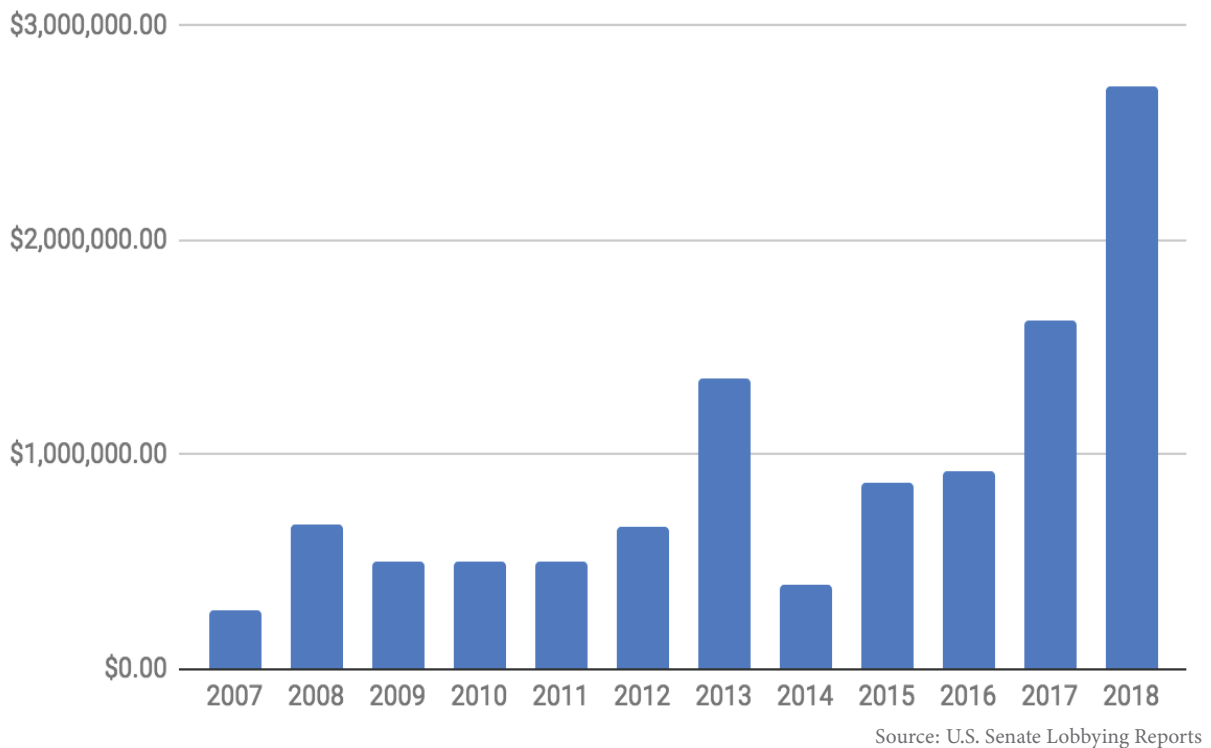
Photo: Brandon Hill - Anchorage DEIS Public Hearing 4/16/19 - On right: Pebble Partnership's Tom Collier, and Mike Heatwole

Since the beginning of the Trump administration, Pebble has paid \$4.43 million to in-house and external lobbyists. Since 2007, that number balloons to more than \$11 million. What is clear is that Pebble is spending more money on lobbyists than most development projects in North America.

In addition to putting some of DC's most notorious lobbyists on contract, Pebble has also invested heavily in a collection of in-house lobbyists and lightly-regulated government affairs consultants. **This includes their CEO, Tom Collier, who stands to make up to a \$12.5 million bonus upon the completion of the federal permitting process.** In addition, Collier has continued to employ his old law firm, Steptoe Johnson, on behalf of Pebble. Collier was a partner in that firm for 40 years.

Since the beginning of the Trump administration, Pebble has paid \$4.43 million to in-house and external lobbyists. Since 2007, that number balloons to more than \$11 million. Pebble is spending more money on lobbyists than most development projects in North America, and this spending represents an enormous percentage of the company's overall resources. While the company is struggling to fund the remainder of its obligations through the permitting process, it has made it clear that lobbying is not a place they will be making cut backs.

Pebble Limited Partnership Yearly Lobbying Spending



Pebble's Investments in the Swamp are Paying Off

The Trump Administration has taken every opportunity to break, bend or ignore long held standards and rules as it has evaluated the Pebble Mine project. Across the Administration, from Scott Pruitt at the EPA to the Army Corps of Engineers' draft EIS process, this Administration has bent over backwards for Pebble. It even went so far as to coordinate some major decisions to help [boost the stock price of Pebble's parent company, Northern Dynasty Minerals](#). With its blind, development-at-all costs agenda, the Trump Administration is not fairly evaluating this project with the best interests of the American taxpayers in mind. The \$4.34 million Pebble has spent to influence the Trump Administration is working.

Beginning in the early days of the Trump administration, Pebble started to receive real concessions from the Environmental Protection Agency. After having been engaged in a lawsuit with the Obama EPA for years, [EPA settled that lawsuit within the first months of Scott Pruitt's time as EPA Administrator](#). EPA's settlement cleared the path for the mine to begin the federal permitting process - a crucial step needed to attract wary investors. EPA, however, made this decision after representatives from Faegre Baker Daniels set up a meeting with Scott Pruitt to discuss the future of the project. The same afternoon that meeting occurred, Pruitt sent an email to agency staff directing them to cancel his future scientific briefings on the issue and informed them of his plans to settle the lawsuit.

As a part of that settlement, Pruitt also agreed to set aside the years' worth of scientific work pursued by the Obama EPA - effectively shelving that process and ensuring a final decision on the Bristol Bay Watershed Assessment would not derail an accelerated permitting schedule for the mine. This created an enormous advantage for Pebble. This is an astonishing breach of protocol that EPA career staffers [flagged during the decision making process](#) as a potential ethical concern. **Their concerns were ignored.**

In spite of the EPA's incredible efforts to support Pebble, the company's relationship with Scott Pruitt eventually turned sour. Pruitt failed to fully dismiss the scientific report that had been pursued by the Obama administration, choosing simply to leave it unfinished. This would allow a future administration to quickly complete the report, saving them years of work repeating what had been done before. This created a problem for Pebble, so it once again turned to its Washington insiders for a fix. In June of 2018, [Pebble held a press conference call expressing their frustrations](#) with Pruitt and questioning his commitment to their industry. This call included the voice of Myron Ebell, who ran the Trump transition team at EPA and who criticized Scott Pruitt at Pebble's behest. Within weeks, Pruitt had been replaced by someone even friendlier to the Pebble project.

The new EPA Administrator who replaced Pruitt has a long history with Pebble. Andrew Wheeler was the deputy EPA administrator under Pruitt, but prior to taking that post he was the [director of the resources portfolio at Faegre Baker Daniels Consulting](#). This is the same department of the same company that set up Pebble's meeting with Scott Pruitt during his first months in office – a meeting which led Pruitt to settle the lawsuit between Pebble and the EPA. Wheeler was leading that department at the time of the meeting.

Faegre Baker Daniels Consulting appears nowhere on Pebble's lobbying reports, despite the fact it has taken an active role in facilitating relationships between Pebble and federal elected and appointed officials. The true and total measure of Pebble's influence in DC is almost unknowable and certainly extends even further beyond the millions of dollars we know it has spent.

Pebble Influence is Driving the Army Corps of Engineers

Pebble's efforts to grease the wheels of power in Washington are already paying off, perhaps in no bigger way than with the release of the Army Corps of Engineers' Draft EIS. By all objective standards, the Pebble EIS ignores years of scientific research, sets aside a host of basic permitting standards and precedents, and simply accepts dubious assertions how the mine would function. The Army Corps of Engineers' job is to hold Pebble accountable and to ensure the project will be safe and responsibly developed to protect the people of Alaska and the economy of Bristol Bay. The Draft EIS fails to do any of that.

To the contrary, Pebble's application has received a preferential treatment seen nowhere else in the history of the EIS process. For example, the Army Corps failed to require Pebble to answer dozens of questions it posed about Pebble's application. In fact, Pebble has refused repeatedly to provide [any semblance of a viable business plan](#) for the project, and the Army Corps has refused to require it. As a result, there are major questions about how this mine would operate, the impact it would have on the region, and the dangers any sort of disaster would pose.

Furthermore, Pebble's application is frequently incomplete, and in some cases, just pure fiction. For example, Pebble's plan for water treatment is untested, it has no estimate of how much it will cost, and it would use more water than any other mine in the country. But Pebble has assured the Corps the water will be cleaner after it is discharged from the mine than it is right now.

This type of cursory environmental review, coupled with an accelerated timeline for public comment, is exactly what Pebble expected to gain from its excessive lobbying expenditures.

Pebble Knows it Must Push Ahead Now

The Pebble Limited Partnership is a junior Canadian mining venture which has never operated a mine, and it's clear it does not want to operate one. Instead, Pebble hopes to profit by selling the permits it acquires with the help of its extensive lobbying and insider influence with the Trump administration. The timing here is vital, and Pebble knows its window of opportunity rests with the Trump administration, because a different administration could finish the science-based Bristol Bay Watershed Assessment and cripple the project. For example, a recent presentation by AECOM, a contractor on the Pebble Project for the Army Corps of Engineers, noted the end of the Trump Administration should be considered a key driver for the project's permitting timeline. In the end, Pebble knows if it has to play by the rules, it won't get the permits it needs.

Pebble now hopes to be bought-out by a larger mining company, gambling that a purchase is a viable path to a return on their investments. Pebble certainly has reason for concern: 4 major mining interests have [invested in – then divested from – the Pebble mine, with First Quantum Minerals walking away most recently in May 2018](#). However, if Pebble gets its state and federal permits, it will have a much more marketable product to sell to potential buyers.

Those permits and the restrictions around them will have been written by DC insider lobbyists and rubber-stamped by the least scientific and thorough permitting agencies our country has ever seen. These permits will linger over the people and economy of Bristol Bay for generations.

We have learned in recent years that even the best and most carefully built mining projects fail. There have been recent large-scale mining disasters from Canada to Brazil, with catastrophic environmental impacts - even in cases where mines like Mount Polley were alleged to have the latest and most sophisticated technology for protecting the environment. The consequences of a project like Pebble – which is getting relatively little scrutiny from state and federal agencies – amidst the richest red salmon fishery in the world, are significant.



The 2014 Mount Polley mine disaster, the tailings dam collapse of 24 million cubic metres of mining waste, is just one example of the scale of the catastrophic threat Pebble Mine is to clean water and healthy salmon.



Pebble's Not Telling the Truth

Everyday Alaskans do not have large piles of cash lying around. But when you're a large corporation, spending millions of dollars on fancy lobbyists buys you access and influence ordinary Alaskans don't have. Considering the fact Pebble's mine application has raced through federal permitting reviews at record speeds, it appears their expensive gambit is paying off.

But with a project as bad as Pebble, sometimes rigging the game simply isn't enough. That's why the Pebble people are doubling down with a tried and true tactic: lies and misinformation. Since Pebble reared its head more than 15 years ago, its supporters have told many lies. Today, as Pebble races to get needed permits while the Trump Administration remains in power, it's settled on three whoppers:

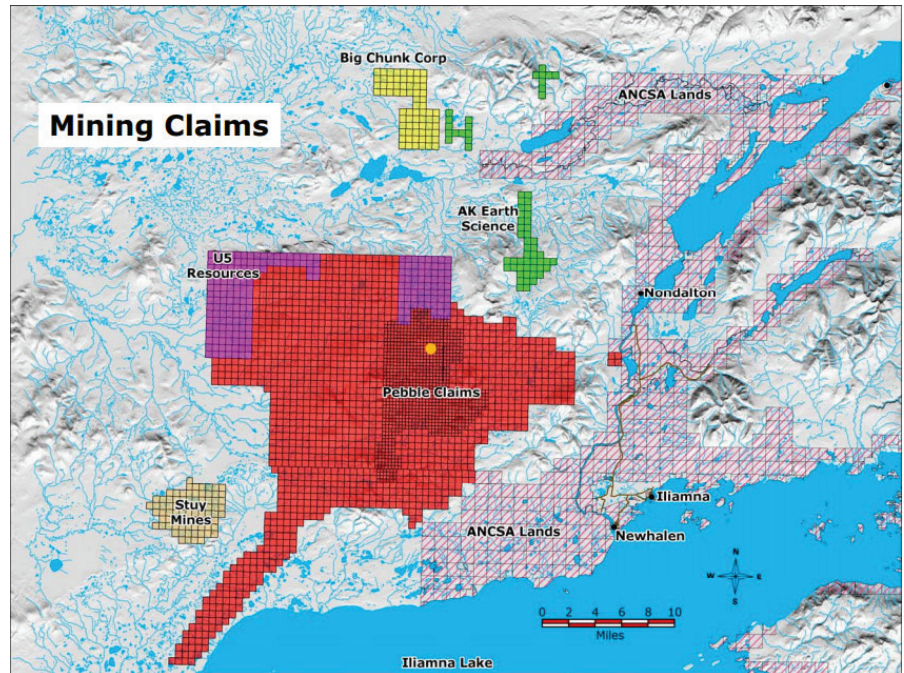
Lie Number 1: "The Pebble Mine will not harm fish." Cook Inletkeeper and others heard this claim several times from Pebble spokesman Mark Hamilton at a January 9, 2019, economic development forum in Homer. And Pebble Partnership CEO Tom Collier – who stands to rake-in up to \$12.5 million in "extraordinary bonuses" if the mine gets permits quickly – boasts the mine "will not harm the fish and water resources in Bristol Bay." Yet according to the draft Environmental Impact Statement (EIS), the mine will eliminate over 3,500 acres of wetlands and more than 80 miles of streams in the headwaters of Bristol Bay. These impacts vastly exceed what EPA considered acceptable to protect wild salmon when the agency conducted its scientifically rigorous, multi-year Bristol Bay Assessment. In other words, the Pebble mine will clearly harm wild salmon and the highly lucrative fisheries of Bristol Bay.

Lie Number 2: "We will not use cyanide for gold recovery." Gold mines often use cyanide to enhance gold recovery, especially in low-grade deposits like Pebble. But cyanide is also highly toxic to people and fish. So, in an effort to pretend they are listening to Alaskans, Pebble is telling us it will not use cyanide. Except there's one problem: Pebble is telling its friends in the mining industry something different. Here's what Pebble's Doug Allen told a group of mining executives in Vancouver this past January:

"In an effort to be responsive to the feedback we've received, we've taken cyanide out of the process flow in this permit. So ...because it is such a bad word in the environmental community, in an effort to show responsiveness and to enhance the probability of us getting a permit, we have taken the secondary [cyanide] gold recovery circuit out of this. So about 12 percent of our gold would be affected by that and we hope at a later date to get permission to potentially add a secondary [cyanide] circuit but not at this time (emphasis added)." Watch the video here @ 6:02-6:42.

Lie Number 3: “We’ve reduced the size of the mine.” When it comes to impacts to water and fisheries from open pit mines, size matters. That’s why the massive size of Pebble’s original proposal drew strong opposition, and why – in a feigned effort to show community concern – Pebble reduced the mine footprint, and limited the mine life to 20 years, in its permit application. But again, what Pebble tells Alaskans is not what Pebble tells its potential investors. Here’s Pebble’s Ron Thiessen talking at the Denver Gold Forum on September 26, 2017:

“You know, and finally, this project, it’s a multi-generational opportunity. It’s size and scale will lead to a very, very long life mine and the property we have hosts showings that we’ve got drillholes in that we believe there’s other mining opportunities as well.” (@1:25-1:46)... In some respects, some of the antagonists to Pebble say that, you know, this is too much for the region, but the reality is, you know, this represents development for many years, perhaps centuries into the future. And when you build the infrastructure in there and you’ve got a concentrator you can feed it forever. (@4:33-5:55).”



Of all the Pebble lies, the “small footprint” lie may be the worst, because if you look at the map above, the Pebble deposit is surrounded by hardrock mining claims. That means once the infrastructure goes in – the roads, the ports, the mine site, the waste pits and tailings facilities – then that will be the catalyst for a massive Bristol Bay mining district.

In a resource development state like Alaska, where giant corporations have “captured” our agencies and our politicians, it’s always hard to stop large oil, gas or mining projects. When project proponents pay fancy lobbyists to grease the permitting skids, and tell outright lies to bamboozle busy Alaskans, it’s makes it all the more difficult.

But as former U.S. Senator Ted Stevens aptly noted, Pebble is the wrong mine, in the wrong place. It will kill fishing jobs and unravel the fabric of Bristol Bay fisheries. It’s safe to say if Pebble gets built, it will transform Alaska like no other project before it. And for that simple reason, ***Alaskans cannot let it happen.***



Pebble 2018 Lobbyist Spending

AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$410,000.00	01/22/2019	2018
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$110,000.00	04/20/2018	2018
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$110,000.00	07/20/2018	2018
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$110,000.00	10/22/2018	2018
Gavel Resources, LLC	Pebble Partnership, LLC	\$50,000.00	05/30/2018	2018
Gavel Resources, LLC	Pebble Partnership, LLC	\$40,000.00	07/16/2018	2018
Pebble Limited Partnership	Pebble Limited Partnership	\$140,000.00	01/21/2019	2018
Pebble Limited Partnership	Pebble Limited Partnership	\$750,000.00	01/30/2019	2018
Pebble Limited Partnership	Pebble Limited Partnership	\$170,000.00	04/20/2018	2018
Pebble Limited Partnership	Pebble Limited Partnership	\$310,000.00	07/20/2018	2018
Pebble Limited Partnership	Pebble Limited Partnership	\$140,000.00	10/19/2018	2018
Squire Patton Boggs	The Pebble Partnership	\$110,000.00	01/16/2019	2018
Squire Patton Boggs	The Pebble Partnership	\$70,000.00	04/17/2018	2018
Squire Patton Boggs	The Pebble Partnership	\$100,000.00	07/12/2018	2018
Squire Patton Boggs	The Pebble Partnership	\$100,000.00	10/17/2018	2018

Appendix, Pebble Total Lobbyist Spending

AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$410,000.00	01/22/2019	2018
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$110,000.00	04/20/2018	2018
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$110,000.00	07/20/2018	2018
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$110,000.00	10/22/2018	2018
Gavel Resources, LLC	Pebble Partnership, LLC	\$50,000.00	05/30/2018	2018
Gavel Resources, LLC	Pebble Partnership, LLC	\$40,000.00	07/16/2018	2018

Pebble Limited Partnership	Pebble Limited Partnership	\$140,000.00	01/21/2019	2018
Pebble Limited Partnership	Pebble Limited Partnership	\$750,000.00	01/30/2019	2018
Pebble Limited Partnership	Pebble Limited Partnership	\$170,000.00	04/20/2018	2018
Pebble Limited Partnership	Pebble Limited Partnership	\$310,000.00	07/20/2018	2018
Pebble Limited Partnership	Pebble Limited Partnership	\$140,000.00	10/19/2018	2018
Squire Patton Boggs	The Pebble Partnership	\$110,000.00	01/16/2019	2018
Squire Patton Boggs	The Pebble Partnership	\$70,000.00	04/17/2018	2018
Squire Patton Boggs	The Pebble Partnership	\$100,000.00	07/12/2018	2018
Squire Patton Boggs	The Pebble Partnership	\$100,000.00	10/17/2018	2018
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$410,000.00	01/17/2018	2017
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$80,000.00	04/19/2017	2017
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$80,000.00	05/08/2017	2017
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$150,000.00	07/19/2017	2017
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$110,000.00	10/16/2017	2017
Gavel Resources, LLC	Pebble Partnership, LLC	\$6,000.00	03/13/2018	2017
Pebble Limited Partnership	Pebble Limited Partnership	\$430,000.00	01/22/2018	2017
Pebble Limited Partnership	Pebble Limited Partnership	\$110,000.00	04/19/2017	2017
Pebble Limited Partnership	Pebble Limited Partnership	\$170,000.00	07/14/2017	2017
Pebble Limited Partnership	Pebble Limited Partnership	\$80,000.00	10/19/2017	2017
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$80,000.00	01/19/2017	2016
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$150,000.00	04/19/2016	2016
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$150,000.00	07/19/2016	2016
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$100,000.00	10/20/2016	2016
Pebble Limited Partnership	Pebble Limited Partnership	\$130,000.00	01/23/2017	2016
Pebble Limited Partnership	Pebble Limited Partnership	\$80,000.00	04/18/2016	2016
Pebble Limited Partnership	Pebble Limited Partnership	\$230,000.00	07/20/2016	2016
AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$150,000.00	01/20/2016	2015

AKIN GUMP STRAUSS HAUER & FELD	Pebble Limited Partnership	\$150,000.00	10/17/2015	2015
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$10,000.00	04/22/2015	2015
Pebble Limited Partnership	Pebble Limited Partnership	\$340,000.00	01/19/2016	2015
Pebble Limited Partnership	Pebble Limited Partnership	\$30,000.00	04/15/2015	2015
Pebble Limited Partnership	Pebble Limited Partnership	\$50,000.00	07/15/2015	2015
Pebble Limited Partnership	Pebble Limited Partnership	\$140,000.00	10/15/2015	2015
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$15,000.00	01/20/2015	2014
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$75,000.00	04/21/2014	2014
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$20,000.00	07/03/2014	2014
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$15,000.00	10/16/2014	2014
Pebble Limited Partnership	Pebble Limited Partnership	\$50,000.00	01/16/2015	2014
Pebble Limited Partnership	Pebble Limited Partnership	\$110,000.00	04/21/2014	2014
Pebble Limited Partnership	Pebble Limited Partnership	\$70,000.00	07/10/2014	2014
Pebble Limited Partnership	Pebble Limited Partnership	\$40,000.00	10/15/2014	2014
Bell & Lindsay, Inc.	GOVBIZ ADVANTAGE INC (Pebble East Claims Corporation/Pebble Limited Partnership)	\$20,000.00	01/21/2014	2013
Bell & Lindsay, Inc.	GOVBIZ ADVANTAGE INC (Pebble East Claims Corporation/Pebble Limited Partnership)	\$20,000.00	04/22/2013	2013
Bell & Lindsay, Inc.	GOVBIZ ADVANTAGE INC (Pebble East Claims Corporation/Pebble Limited Partnership)	\$30,000.00	07/22/2013	2013
Bell & Lindsay, Inc.	GOVBIZ ADVANTAGE INC (Pebble East Claims	\$20,000.00	10/21/2013	2013

	Corporation/Pebble Limited Partnership)			
Comstock Consulting LLC	GovBiz Advantage, Inc on behalf of the Pebble Partnership	\$5,000.00	04/19/2013	2013
Comstock Consulting LLC	GovBiz Advantage, Inc on behalf of the Pebble Partnership	\$5,000.00	07/14/2013	2013
Comstock Consulting LLC	GovBiz Advantage, Inc on behalf of the Pebble Partnership	\$5,000.00	10/17/2013	2013
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$75,000.00	01/22/2014	2013
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$110,000.00	04/23/2013	2013
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$110,000.00	07/21/2013	2013
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$110,000.00	10/21/2013	2013
Pebble Limited Partnership	Pebble Limited Partnership	\$150,000.00	01/22/2014	2013
Pebble Limited Partnership	Pebble Limited Partnership	\$400,000.00	07/19/2013	2013
Pebble Limited Partnership	Pebble Limited Partnership	\$240,000.00	10/18/2013	2013
SWF Consulting, L.L.C.	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$6,000.00	02/03/2014	2013
SWF Consulting, L.L.C.	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$6,000.00	04/22/2013	2013
SWF Consulting, L.L.C.	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$6,000.00	07/31/2013	2013
SWF Consulting, L.L.C.	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$6,000.00	10/21/2013	2013
The Livingston Group, LLC	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$10,000.00	04/19/2013	2013
The Livingston Group, LLC	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$10,000.00	07/22/2013	2013
The Livingston Group, LLC	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$10,000.00	10/21/2013	2013
Van Ness Feldman, LLP	PEBBLE LIMITED PARTNERSHIP	\$20,000.00	07/18/2013	2013

Bell & Lindsay, Inc.	GOVBIZ ADVANTAGE INC (Pebble East Claims Corporation/Pebble Limited Partnership)	\$20,000.00	01/22/2013	2012
Bell & Lindsay, Inc.	GOVBIZ ADVANTAGE INC (Pebble East Claims Corporation/Pebble Limited Partnership)	\$15,000.00	04/20/2012	2012
Bell & Lindsay, Inc.	GOVBIZ ADVANTAGE INC (Pebble East Claims Corporation/Pebble Limited Partnership)	\$15,000.00	07/20/2012	2012
Bell & Lindsay, Inc.	GOVBIZ ADVANTAGE INC (Pebble East Claims Corporation/Pebble Limited Partnership)	\$20,000.00	10/19/2012	2012
Comstock Consulting LLC	GovBiz Advantage, Inc on behalf of the Pebble Partnership	\$5,000.00	01/21/2013	2012
Comstock Consulting LLC	GovBiz Advantage, Inc on behalf of the Pebble Partnership	\$5,000.00	10/16/2012	2012
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$110,000.00	01/24/2013	2012
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$110,000.00	04/20/2012	2012
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$120,000.00	07/18/2012	2012
GovBiz Advantage, Inc.	Pebble East Claims Corporation/Pebble Limited Partnership	\$120,000.00	10/19/2012	2012
SWF Consulting, L.L.C.	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$9,000.00	01/30/2013	2012
SWF Consulting, L.L.C.	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$10,000.00	08/13/2012	2012
SWF Consulting, L.L.C.	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$9,000.00	10/25/2012	2012
The Livingston Group, LLC	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$10,000.00	01/18/2013	2012
The Livingston Group, LLC	GovBiz Advantage, Inc. (for Pebble Limited Partnership)	\$10,000.00	04/20/2012	2012