

January 5, 2011

The Honorable Michael R. Bloomberg
Office of the Mayor of New York
City Hall
New York, NY 10007

Re: Taxi of Tomorrow Campaign and Finalists Doing Business in Iran

Dear Mayor Bloomberg:

On behalf of United Against Nuclear Iran (UANI), I am writing to express my concern that two finalists in the Taxi of Tomorrow campaign, Nissan Motor Company ("Nissan") and Karsan Otomotiv ("Karsan"), have extensive business dealings in Iran. Through their respective business operations, Nissan and Karsan are facilitating the Iranian government's ability to engage in behavior that runs directly counter to the security and values of the people of New York City. UANI calls upon the Office of the Mayor to factor this in its decision-making process in the Taxi of Tomorrow campaign and any other similar campaign and not award either company with lucrative contracts if their business operations in Iran continue.

As you know, this past year has seen Iran accelerate its pursuit of an illegal nuclear weapons program and failure to cooperate with the International Atomic Energy Agency. Moreover, Iran remains the world's leading state sponsor of terrorism and is engaged in a brutal crackdown against peaceful dissidents throughout the country. And it was only this past September in New York City that President Ahmadinejad shamefully offended all New Yorkers by promulgating wild conspiracy theories about the true perpetrators of September 11, 2001.

Against the backdrop of Iran's continued defiance of international law, however, the international community came together in unprecedented ways to isolate the Iranian regime and send a strong signal that their behavior is unacceptable. In June of 2010, the United Nations Security Council passed a fourth round of sanctions against Iran. In the subsequent three months, the United States, the European Union, Canada, Australia, Japan, and South Korea all enacted sanctions laws to counter the threat posed by Iran's pursuit of nuclear weapons.

With respect to U.S. law, this past summer, President Obama signed into law new Iran sanctions legislation, the *Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010* (CISADA). It significantly expands the scope of entities covered under the Iran Sanctions Act of 1996 to include foreign subsidiaries and affiliates. Section 106 of CISADA expressly prohibits companies from entering into contracts with the U.S. government if engaged in sanctionable activity covered under the law. The U.S. government recognized that Americans did not want their taxpayer dollars going to companies doing business with a government that directly threatens international

peace and stability. I have no doubt the people of New York City would hold equal, if not stronger views.

By way of background, UANI asks your office to consider the following issues. With respect to Nissan, they have had a longtime relationship with the Iranian car manufacturer, Pars Khodro, and have been producing cars and trucks in Iran since 1987. These operations continue to this day. (*The New York Times*, "Profiting from Iran, and the US," March 6, 2010). Nissan and its partner Pars Khodro make no attempt to hide this business relationship and it is advertised on a variety of company profiles and their company Website. (See, Nissan's "Profile 2008" and the Pars Khodro Website).

Similarly, the Turkish auto company, Karsan entered into a five-year exclusive distribution agreement in 2007 with Iran's Sanat Khodro Kamau to export J9 minibus models to Iran. (Karsan Report, May 10, 2007). Karsan has entered into a business relationship with the National Iranian Gas Company (NIGC Site, "Karsan J9 Premier," February 26, 2007) and, as recently as July 2010, the company indicated that their vehicles would be sold not only in Iran, but Syria as well. (Press Release, "Creation of 'J10' for 7 Million Euros Astonished French Peugeot," July 15, 2010). While Nissan and Karsan are continuing their business operations in Iran, a number of responsible corporations are doing the opposite. In the past two years, General Electric, Toyota, KPMG, ThyssenKrupp, Komsatsu and, most recently, Transammonia, have all announced that they are pulling out of Iran. In so doing, they recognized short-term profits are not worth the long-term costs of aiding a regime that is threatening to destabilize the region.

Nissan and Karsan's decision to do business in Iran is wrong. As Mayor of New York, however, you can let them know that the people of New York City will not help finance those irresponsible and unethical business decisions.

Any company seeking to do business with New York City should only be eligible to do so if they are able to certify that they do not do business with Iran. Companies should not be able to hide behind the corporate veil of foreign subsidiaries when they make such certification. Attached for your review is a proposed certification for your consideration. Certifications such as these help the public make informed investment decisions and will enable New York City officials to ensure that taxpayer dollars are spent in ways that align with the values of the people of this great city.

Should you have any questions or would like further details, please do not hesitate to contact me. I would be happy to discuss any of the above mentioned issues with you at your convenience.

Thank you for your immediate attention to this matter.

Very truly yours,



Ambassador Mark D. Wallace

cc: David Yassky
Chair/Commissioner, New York City Taxi and Limousine Commission

Elias Arout
Commissioner, New York City Taxi and Limousine Commission

Harry Giannoulis
Commissioner, New York City Taxi and Limousine Commission

Iris Weinshall
Commissioner, New York City Taxi and Limousine Commission

Edward Gonzales
Commissioner, New York City Taxi and Limousine Commission

Lauvienska Polanco
Commissioner, New York City Taxi and Limousine Commission

Jeffrey A. Kay
Commissioner, New York City Taxi and Limousine Commission

Edna Wells Handy
Commissioner, New York City Department of Citywide Administrative Services

Carlos Ghosn
President and Chief Executive Officer, Nissan Motor Co., Ltd.

Toshiyuki Shiga
Chief Operating Officer, Nissan Motor Co., Ltd.

Alan J. Buddendeck
Corporate Vice President, Global Communications, Nissan Motor Co., Ltd.

Carlos Tavares
Chairman, Management Committee – Americas, Nissan Motor Co., Ltd.

Brian Carolin
Senior Vice President, Sales and Marketing, Nissan North American, Inc.

Andrew Tavi
Vice President, Legal and Government Affairs, and General Counsel, Nissan North America, Inc.

Murat Selek
Chief Executive Officer, Karsan Otomotiv

İnan Kırac
Chairman of the Board of Directors, Karsan Otomotiv

United Against Nuclear Iran/Iran Business Declaration

The undersigned [**Name**], the [**Title**] of [**Company**] (the “Company”), does hereby certify on behalf of the Company, and not in the undersigned’s personal capacity, that neither the Company nor any Affiliate¹ of the Company, directly or through an agent, representative or intermediary:

- (1) Is or is currently planning on engaging in any business or in providing any goods or services in Iran or with Iranian-based business anywhere in the world except for the provision of goods or services to relieve human suffering in Iran or as part of news gathering for the dissemination of news and information about Iran worldwide;
- (2) Is or will be a party to any agreement with any Iranian business or other entity or Iranian governmental authority, or the owner of an equity interest in, any Iranian entity, or;
- (3) Owns or operates any plant, property, equipment or other assets located in Iran.

The undersigned hereby authorizes United Against Nuclear Iran to publicly disclose the contents of this Certificate.

Dated this ____ day of ____, 200__.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on **MM/DD/YYYY**.

Signed by:

(Name)

(Title)

(Company)

¹ “Affiliate” means any individual or entity that directly or indirectly controls, is controlled by, or is under common control with, the Company, including without limitation direct and indirect subsidiaries of the Company.