

November 15, 2006

Dell  
Attn: General Counsel's Office  
1 Dell Way  
Round Rock, TX 78682-2222

Dear General Counsel of Dell:

The Project On Government Oversight (POGO) is overhauling and renewing its Federal Contractor Misconduct Database ([www.pogo.org/db/index.cfm](http://www.pogo.org/db/index.cfm)), a compilation of information from public resources regarding government contractors, including Dell. You have already responded to a previous letter, which is greatly appreciated. I have enclosed findings relevant to Dell that have been added since the first letter and am requesting verification or refutation of the data from you.

Any response would be extremely welcomed, as the accuracy of this information is in the best interest of all parties. Out of fairness to Dell, please be assured that any response received by POGO will be posted on the website along with the data.

If you have any questions, I can be reached at (202) 347-1122. Thank you for your time and consideration.

Sincerely,

Scott Amey  
General Counsel

Enclosure

New Instance of Misconduct:

1.

Violations of Export Administration Regulations

Date: 06/17/1997 (Date of Penalty)

Misconduct Type: Import/Export

Contracting Party: N/A

Court Type: Administrative

Amount: \$50,000

Disposition: Fine

Synopsis: On June 17, 1997, the Commerce Department's Bureau of Export Administration imposed a \$50,000 civil penalty on Dell Computer Corporation for alleged violations of the Export Administration Regulations. "The Department alleged that Dell made three shipments of U.S. origin computer equipment from the United States to Iran without the required U.S. export licenses between March, 1992 and June, 1992. In connection with the exports, the Department also alleged that the company made false and misleading statements of material fact on export control documents."

Document(s):

DOC Press Release

New Pending Case

1.

Arteaga v. Dell Financial Services LP (Ethnic Discrimination)

Date: 05/03/2006 (Date of Complaint)

Misconduct Type: Other

Contracting Party: N/A

Court Type: Civil

Amount: \$0

Disposition: Pending

Synopsis: A class-action lawsuit filed in Florida alleges that "Dell Computer's financial arm illegally denies credit to Hispanics and other ethnic minorities who want to buy or lease computers from the company". Juan C. Arteaga, plaintiff in the case, alleges that Dell denied him credit because the company believed he couldn't speak English". "The lawsuit alleges Dell Financial violated the Equal Credit Opportunity Act, 15 USC §1691 et. seq., which prohibits businesses from using age, race, national origin, gender, marital status, religion or receipt of public assistance to deny credit or to provide credit on different terms than those offered to others with a similar credit risk."

Document(s):

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