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United States Senate

COMMITTEE ON FOREIGN RELATIONS

WASHINGTON, DC 20510-6225

April 09, 2018

Nigel J. Oakes
Chief Executive Officer and Director
SCL Group
1901 Pennsylvania Avenue NW
Suite 902
Washington, DC 20006

Dear Mr. Oakes:

I write seeking additional information regarding the work that your companies, SCL Group and its subsidiaries, including Cambridge Analytica (collectively, SCL), have performed abroad and in the United States. Recent reports paint a disturbing picture of some of SCL's work, including efforts to test certain data practices with particular populations. According to one account, SCL has "experimented with data-driven microtargeting techniques in the Caribbean and Africa, where privacy rules are lax or nonexistent and politicians employing SCL have been happy to provide government-held data."¹

That assertion seems to complement marketing material on SCL's website which notes that "many government agencies have amassed large data relevant to their operations. However, many of these databases remain unexploited."² These statements are especially troubling in light of allegations that your company misappropriated the personal information of up to 87 million Facebook users to target them in political campaigns. What's more, an SCL subsidiary recently ran a campaign in the United States, paid for by a foreign government, which included multiple Facebook ad buys.³

SCL also appears to have engaged in work around the world that raises several potential ethical and legal questions, particularly regarding foreign elections. In Latvia, for example, SCL said it ran a campaign in 2006 which stoked tensions between Latvians and ethnic Russian residents.⁴ In Nigeria, it described its work in the 2007 general election as "organizing anti-poll rallies on the day of the election" and advising the ruling party on how to discourage opposition supporters

¹ <https://www.nytimes.com/2018/03/19/us/cambridge-analytica-alexander-nix.html>

² <https://sclgroup.cc/customers#international>

³ <https://www.fara.gov/docs/6473-Registration-Statement-20171006-1.pdf>

⁴ <https://www.bloomberg.com/news/articles/2017-03-23/trump-data-gurus-leave-long-trail-of-subterfuge-dubious-dealing>

from voting.⁵ In St. Vincent and the Grenadines, the prime minister accused SCL of funneling foreign money into the opposing campaign.⁶

SCL executives Alexander Nix and Mark Turnbull claimed that, in Eastern Europe, the company worked with private intelligence operatives to blackmail opponents in political campaigns. As Mr. Turnbull put it, “we’ve just used a different organization to run a very, very successful project in an Eastern European country, where they did a really – no one even knew they were there. They just drift, they were just ghosted in, did the work, ghosted out, and produced really, really good material.”⁷ Previous reports point to marketing material in which SCL claimed to be able to create an operations center that “can override all national radio and TV broadcasts in time of crisis,” apparently alluding to work that your company has done for a country in Asia.⁸ And one recent report alleges that SCL Group paid a contractor to offer a politician a \$1.5 million bribe during a 2010 election in St. Kitts and Nevis.⁹

Ensuring free, fair, and transparent elections in democracies abroad is one of our nation’s top priorities in foreign assistance programs and diplomatic efforts, and an ongoing priority for the U.S. Senate Committee on Foreign Relations. If people do not trust their democratic process, then their faith in the institutions of government begins to erode, leading to economic uncertainty and political strife. Stable, democratic countries that equally represent their citizens promote stability and prosperity which directly contributes to United States’ national security interests. Any potential effort to undermine faith in elections and the democratic process abroad is a concern for the United States and this Committee.

To better understand the work of your companies around the world, and how they might affect U.S. interests abroad, please provide the Committee with the following information by April 16, 2018:

1. A complete list of the countries where SCL and any of its subsidiaries, including Cambridge Analytica, has engaged in any work regarding political campaigns, elections, microtargeting, or efforts to influence public opinion. For each country, please include the time period(s) of the work; the customer(s) of the work; the activities the relevant companies carried out for the customer(s), including the hiring of third parties; any entities, including LLCs, created to carry out the work; and any other relevant information, including whether data from government databases were used.
2. A complete list of countries where SCL, and any of its subsidiaries, has been awarded government contracts. For each country, please include the time period(s) of the work; the customer(s) of the work; the activities carried out for the customer(s), including the

⁵ <https://www.bloomberg.com/news/articles/2017-03-23/trump-data-gurus-leave-long-trail-of-subterfuge-dubious-dealing>

⁶ https://www.buzzfeed.com/kendalltaggart/company-tied-to-trump-campaign-once-pushed-voter-suppression?utm_term=.llr50W0pZp#.ery1kMk383

⁷ <https://www.channel4.com/news/cambridge-analytica-revealed-trumps-election-consultants-filmed-saying-they-use-bribes-and-sex-workers-to-entrap-politicians-investigation>

⁸ http://www.slate.com/articles/news_and_politics/dispatches/2005/09/you_cant_handle_the_truth.single.html

⁹ <https://www.thetimes.co.uk/article/cambridge-analytica-british-data-firm-offered-1m-bribe-to-turn-election-psmv359vh>

hiring of third parties; any entities, including LLCs, created to carry out work; and any other relevant information, including whether data from government databases were used.

3. A complete list of work for the U.S. State Department that SCL, or any of its subsidiaries, has proposed, commented on, bid on, worked on (as a primary contractor or subcontractor), or otherwise had any involvement in.
4. An explanation of all SCL work carried out in the United States on behalf of foreign governments, including all social media platforms used, and whether SCL used algorithms or data in that work which were derived from the misappropriated Facebook data.
5. A detailed description of the work that Michael Flynn performed as an advisor for SCL Group, including from November to December 2016, and especially regarding any ongoing or potential contracts for the U.S. State Department or any other U.S. government entities.

Thank you for your prompt attention to this matter. Please do not hesitate to contact my office if you have any questions regarding this request.

Sincerely,



Robert Menendez
Ranking Member