

I, Peter Vaughan, hereby depose and say that:

1. I am a Managing Director and Senior Counsel of BlackRock, Inc. (“BlackRock”).
2. BlackRock is a global investment management company with approximately \$3 trillion in assets under management.
3. All BlackRock employees are subject to the firm’s Confidentiality and Employment Policy, which requires that employees treat all matters relating to its clients’ affairs in the strictest confidence.
4. In 2008, BlackRock was retained by the Federal Reserve Bank of New York (“FRBNY”) to act as the investment manager for certain portfolios known as Maiden Lane LLC (“ML I”), Maiden Lane LLC II (“ML II”) and Maiden Lane III. These portfolios were created as part of the FRBNY’s financial support of Bear Stearns and AIG, respectively. The ML I portfolio contains, among other significant investments in residential mortgage backed securities (“RMBS”), commercial mortgage backed securities (“CMBS”) and commercial real estate loans. The ML II portfolio contains non-Agency RMBS.
5. On or about April 20, 2011, Wendy Wong of FRBNY sent an email to Lili Forouraghi and Suraj Panjwani of BlackRock. Ms. Forouraghi and Mr. Panjwani are a Managing Director and Vice President, respectively within BlackRock’s Financial Markets Advisory (“FMA”) Group, the BlackRock advisory business that manages the Maiden Lane portfolios.
6. In her April 20, 2011 email, Ms Wong requested that BlackRock, in its capacity as agent for FRBNY, participate in a telephone conference call with the FRBNY and the U.S. Department of Justice (the “DOJ”) for the purpose of discussing two Qui Tam lawsuits, which concerned in part the ML I and ML II portfolios. Ms. Wong’s email also attached copies of the complaints filed in those Qui Tam lawsuits and advised BlackRock “to keep the complaint[s] strictly confidential.”
7. Also on April 20, 2011, Ms. Forouraghi forwarded a copy of Ms. Wong’s email internally at BlackRock to Roland Villacorta and Ryan Marshall and copying Mr. Panjwani, for the purpose of arranging BlackRock’s requested participation in the call between FRBNY and the DOJ. Messrs. Villacorta and Marshall Co-Heads of the FMA Group Portfolio Management. Later that same day, Ms. Forouraghi also forwarded me a copy of Ms Wong’s email requesting my participation in the call, which was expected to occur on April 28, 2011.
8. BlackRock maintains information barrier policies and procedures throughout the firm, and specific procedures applicable to FMA Group activities. Those

Vaughan Affidavit
May 6, 2011
Page 2 of 3

procedures were specifically designed to restrict access to confidential information to those investment professionals within the FMA Group who have a “need to know” in order to service a particular assignment.

9. On April 20, 2011, Mr. Panjwani also sent a copy of Ms. Forouraghi’s email to me to Stephen Ahrens, a Director in BlackRock’s Legal and Compliance Department, who reports directly to me.
10. Between April 20 and April 28, 2011, there were several emails between and among me and the BlackRock employees mentioned above regarding the scheduling of the April 28 meeting.
11. On April 28, 2011, Mr. Villacorta and I participated in a conference call from Mr. Villacorta’s office, with the FRBNY and the DOJ. Ms. Forouraghi was also present for approximately the last fifteen minutes of the call. During the call, a discussion took place regarding certain of the allegations in the Qui Tam lawsuits. At the request of Ms. Leventhal, Mr. Villacorta also discussed generally the process by which RMBS trusts are formed and the roles of various parties including loan originators, loan servicers and trustees. The conversation lasted approximately one and one-half hours.
12. Near the end of the April 28 call, a discussion ensued regarding the confidential nature of the Qui Tam lawsuits. A representative from the DOJ asked me and Mr. Villacorta about the distribution of the Qui Tam complaints within BlackRock. He also asked that BlackRock destroy or return all copies of the complaints, which BlackRock agreed to do.
13. Before I left Mr. Villacorta’s office, I obtained from him all hard copies of the Qui Tam complaints. Upon returning to my office, I supervised the shredding of my and Mr. Villacorta’s copies of the complaints. I also instructed Ms. Forouraghi to destroy any hard or electronic copies of the Qui Tam complaints and to advise any other individuals, including Messrs. Marshall and Panjwani, who had received such copies to do the same.
14. After conducting a review of relevant emails and speaking with the individuals who received the Qui Tam complaints, I determined that the only Blackrock employees who received these complaints are me and the Blackrock employees mentioned above. I have confirmed with all these employees that all hard copies and electronic copies of the Qui Tam complaints have been destroyed or deleted. I have also instructed these individuals that the qui tam complaints

Vaughan Affidavit
May 6, 2011
Page 3 of 3

are under seal and that the employees are not allowed to discuss the existence of or the allegations in the complaints with anyone other than people permitted access to the complaints under the seals.

Peter Vaughan

STATE OF NEW YORK
: SS
COUNTY OF NEW YORK

Sworn to and subscribed before me, a notary public in the state and county aforesaid, this 6th day of May, 2011.

Notary Public

My commission expires: 5/21/2011

STEPHEN M. HART
NOTARY PUBLIC - State of New York
No. 01HA6166170
Qualified in New York County
Commission Expires 5/21/2011