

To: Edward LEHMAN (contact email: [REDACTED])

From: [REDACTED] (contact email: [REDACTED] phone +86-[REDACTED])

Subject: RICO, FCPA, pattern of racketeering activity by McDonald's Corporation and its subsidiary companies

Summary:

McDonald's Corporation and its subsidiary companies have engaged, for years, in a pattern of racketeering activity, money laundering, and corruption of *at least one* French official. Multiple subsidiary companies of McDonald's Corporation across the world, including McDonald's USA, have been defrauding consumers.

I was a victim of the frauds in France for the year 2011. I informed McDonald's France and their executives that the sweepstakes constituted serious fraud. They ignored my unrelenting stern warnings and kept defrauding millions of consumers. McDonald's France caused irreparable damages through years of racketeering activity.

I also kept warning **McDonald's Corporation** that its subsidiary company in France was engaged in a pattern of racketeering activity and they **would finally acknowledge in 2015 that there were taking the inquiry seriously.**

Statement of facts - Selected facts by chronological order (when time is indicated, it's Beijing time zone):

2002-03-xx, the French Minister of the Interior summons McDonald's France executives. They are accused of running an illegal lottery. Back in 2002, the French authorities were very tough with McDonald's commercial practices. They were then concerned about children being targeted. Later, the French authorities would become very docile, very submissive. Based on my experience with French officials, even afraid. An interesting shift took place.

2011-October-November: McDonald's France and its franchisees commits serious frauds through its Monopoly sweepstakes. There were at least two frauds in the 2011 edition. I was a victim of at least two frauds.

- First fraud, the instant win game was rigged, McDonald's lied on the chance of winning. They claimed consumers had 1 chance out of 4 to win instantly but it was a lie. McDonald's falsely claimed 1 chance out of 4, per sticker (or 25%). The fine print states it is 1 chance out of 2 (or 50%), per sticker. It was neither 25% of chance nor 50% of chance. It was, in reality, 1 chance out of 8, (or 12.5%). There is a fourfold deviation. **It's exactly as if a jewelry store started selling jewelries claiming it's 12k gold but the fine print would claim that it's actually 24k gold and in reality it would only be 6k gold.** New York Times journalist Constant Méheut who studied mathematics at an advance level agrees that it constitutes fraud. You can read my simple, **easy to understand demonstration** to him at this URL: <https://www.tojournalists.com/open-letters/explanations-sent-to-constant-meheut-may-25-2022/>

- Second fraud, the collection game was rigged. McDonald's lied again on the chance of winning. Some properties were in fact rare but McDonald's omitted to warn the consumers. They lied on the probability of winning by not telling certain properties were rare. The consumers were made to believe that there were 26 properties and that they had an equal probability to get any one of these twenty-six properties. Furthermore, **one of the claims** McDonald's made that year in France was that consumers had to complete the entire board to claim their prizes which of course implies that it's doable. However, I believe no one every succeeded, anywhere worldwide, not even once, to complete the entire board with a rigged version of the game.

2011-12-15: I send certified mails, with proof of receipt requested, to McDonald's France and their executives, asking them to pay me the prizes I should have won had the game not been rigged. About 283675 euros. No answer.

2012-06-12: I send more certified mails, with proof of receipt requested to McDonald's France and their executives and the *huissier de justice*, a French ministerial officer who in France must authorize such sweepstakes. My claim hasn't changed but due to the depreciation, I now ask for 283675 euros in cash rather than the physical prizes. **VERY IMPORTANT: Furthermore, I warn McDonald's that they are under legal obligation to warn the investors according to S.E.C. regulations because they are potentially bankrupt.** I specifically ask for "James Skinner [...] Andrew McKenna [...] Donald Thompson, Gloria Santona [...] Kevin Ozan [...] Enrique Hernandez [...] Richard Lenny [...] Sheila Penrose" from McDonald's Corporation and/or from the Board to be formally notified.

2012-06-25, McDonald's France General Counsel, Françoise de Borda, replies by contesting my accusations of fraud. She sends a copy to the *huissier de justice* which is awkward since it was his job to make sure that the sweepstakes didn't constitute an illegal lottery, let alone a serious fraud targeting children. I am now accusing the *huissier de justice* of passive corruption. He has been paid by McDonald's to turn a blind eye on their serious frauds.

2013-05-26 (circa): I send a letter, through regular mail if I recall correctly, to Ms. Santona (then General Counsel of McDonald's Corporation), Mr. Thompson (then the CEO), and to Mr. McKenna (then the Chairman) to tell them about the problems with the McDonald's Monopoly in France and to tell them that I suspect the *huissier de justice*, a French ministerial officer who in France must authorize such sweepstakes, must have been bribed to give his approval since the sweepstakes obviously constitute serious frauds. I would receive no answer.

2013-05-30: I send new certified mails, with proof of receipt requested, to McDonald's France and their executives. I now have a better understanding of French laws, jurisprudence, and regulations. My claim increases to about 1'003'344.00 euros. I wouldn't get any answer from McDonald's.

2013-XX-XX: Jean-Pierre Petit, then CEO of McDonald's France, publish a book ("I sold my soul to McDonald's") in which he ambiguously seems to claim that they (McDonald's France) now have influential politicians in their pocket, like the former Minister of Health Xavier Bertrand for example. More importantly, he acknowledges that McDonald's Corporation had once been able **through a single phone call** to immediately stop a perfectly legal, then ongoing, advertising campaign in France simply because it was deemed potentially offensive to some people.

2015-10-17 at 14:46: I send an email to Ms. Gloria Santona and CC the email to various U.S. executives of McDonald's Corporation, including the CEO Steve Easterbrook, warning them about the frauds which have been taking place in France. The subject of the email is "SEC and Foreign Corrupt Practices Act violations". My claim had by now increased to about 3 millions euros. I would also talk to Ms. Santona on the phone.

2015-10-21 at 22:45: after having sent Ms. Santona and other McDonald's executives **about 7 additional emails, some of them with irrefutable evidence of the frauds and pattern or racketeering activity,** I request an update. Ms. Santona answers me saying, among other things, **"Of course, we take such inquiries seriously."** I also kept asking and begging the executives of McDonald's to immediately suspend the then ongoing 2015 fraud in France. Click this link to visualize Ms. Santona's email.

2015-10-23 at 05:34: I receive an email from Malcolm Hicks, Corporate Vice President of McDonald's Europe and General Counsel. He makes me understand that he is also taking the problem seriously and tells me that he "will be instructing an outside French lawyer to examine this issue". I suspect it was the law firm Allen & Overy even though I

would receive a communication from Péchenard. He warns me “it is only counter-productive to send correspondence to as many people as [I] can find in the McDonald’s system”. [Click this link to visualize Mr. Hick’s email.](#)

2015-10-27: I receive an email from the French lawyer **Éric Andrieu** who works for the law firm **Péchenard & Associés**. **Éric Andrieu** is the **best friend of former General Director of the French National Police Frédéric Péchenard** who has **strong ties with François Molins** who used to be **Public Prosecutor of the Paris Court** and is now the **Procureur Général** at one of the French supreme courts. The Péchenard & Associés law firm was founded by the parents of Frédéric Péchenard. **It’s a huge conflict of interest.** Mr. Andrieu claims everything is legal. It’s not true.

2015 November and December: I would keep emailing McDonald’s executives asking them to stop the fraud.

2015-12-xx (circa): I file a complaint with the S.E.C. Office of the Whistleblower.

2015-12-23 at 20:30 +0800 (Beijing time): **IMPORTANT** I talk to the FBI on the phone. It’s the Field Office of Chicago. You can listen to the call on YouTube: <https://www.youtube.com/watch?v=5n4OKk0501s>

2015-12-28 at 23:40: I send an email to **Debbie Schroeder working for the Investor Relations department at McDonald’s Corporation**. I basically ask her if McDonald’s Corporation disclosed any information regarding the frauds committed by McDonald’s in Europe.

2015-12-30 at 22:49: Debbie Schroeder replies telling me among other things: “Thank you for passing along your questions – I am still looking into them and will get back to you as soon as possible.”

From 2015-12-31 to 2016-01-12: I would send more emails with more explanations to Debbie Schroeder, some of the emails CCEd to Steve Easterbrook, Gloria Santona, and Malcolm Hicks. **She would now keep silent. Why?**

2016-01-04 at 21:48: I noticed connections to my websites coming from the network of Allen & Overy in London. I therefore sent an email to Ms. Santona, Mr. Easterbrook, and Mr. Hicks to ask the name of their lawyer. No answer.

2016-08-17 at 10:03: I send an email to Gloria Santona, Steve Easterbrook, and Malcolm Hicks to ask them to immediately stop the ongoing fraud taking place in **Ireland**. Allen & Overy would visit my websites again.

2016-10-05 at 22:07: I send an email to Steve Easterbrook, Gloria Santona, and Malcolm Hicks in an attempt to make them understand that their sweepstakes in **Australia, New Zealand, and Canada** are also illegal.

2016-10-24 at 17:03: IMPORTANT: MCDONALD’S FRANCE KEEPS DEFRAUDING CONSUMERS IN FRANCE AND MCDONALD’S CORPORATION KEEPS CONDONING THIS PATTERN OF RACKETEERING ACTIVITY Starting from that date, I will send multiple emails to McDonald’s executives, both from France and the U.S. and also Malcolm Hicks who is based in London, to warn them about the illegality of their 2016 edition of the Monopoly sweepstakes in France. **IMPORTANT: this edition was radically different from the previous edition. It’s like a totally new concept. BUT IT WAS STILL VERY FRAUDULENT!** Authorized by the same *huissier de justice* (=> FCPA).

2016-11-24 at 01:15: I receive an email from Twitter informing me that Gloria Santona is now following me on Twitter. It opens a direct communication channel between me and her. I start writing to her but she ends up blocking me. It’s an important piece of evidence because she makes contact with one of their victim: me. Did she have remorses?

2017-02-14 at 23:21: IMPORTANT: FIRST AND LAST WARNING SENT IN RESPECT OF THE MONOPOLY SWEEPSTAKES IN THE U.S.: I sent an email to the executives of McDonald’s Corporation but also to the CEO of McDonald’s USA Chris Kempczinski, future CEO of McDonald’s Corporation. I informed them that according to me, the McDonald’s Monopoly sweepstakes in the United States is illegal. If I am not mistaken, the Monopoly sweepstakes would never take place again in the United States after this formal notice. It might be a coincidence. It might also mean that Mr. Kempczinski was very diligent. It could potentially be very important.

2017-10-31 at 15:47: IMPORTANT: MCDONALD’S FRANCE KEEPS DEFRAUDING CONSUMERS IN FRANCE AND MCDONALD’S CORPORATION KEEPS CONDONING THIS PATTERN OF RACKETEERING ACTIVITY: I send an email to Steve Easterbrook, Jerry Krulewitch (the new General Counsel of McDonald’s Corporation, **by this time, Ms. Santona left**), and Malcolm Hicks to warn them about the illegality of the 2017 edition of the Monopoly in France. But they wouldn’t stop it. They would condone the fraud which was slightly different from 2016.

2019-09-27: IMPORTANT a very famous, in France, anticorruption association Anticor would confirm to me that **elected officials have the legal obligation according to the French Code of Criminal Procedures to report the infractions they are made aware of.** Earlier, I had written to French elected official Mr. Cédric VILLANI who is the Fields Medal winner (the Nobel Prize of mathematics) to beg him to confirm that my allegations that McDonald’s had committed fraud were true. His director of communication Philippe Mouricou would put huge pressure on me asking me to close my websites, not to mention Villani’s name in association to this fraud. He also accused me of using the same methods as McDonald’s which makes me wonder: was Mr. Villani pressured by McDonald’s? (=>FCPA)

Around this time, I would also publicly challenge François Molins who had then become the *Procureur Général près la Cour de Cassation*. I had registered the domain name FrancoisMolins.com (**non-official** website on Mr. Molins) on which I was publishing open letters to him. I publicly told him that **if he kept pretending that what McDonald’s did didn’t constitute serious frauds, he was either dangerously incompetent or corrupted.** Many official/legal/public documents in various courts of law in France have been doctored/falsified including one proof of receipt handled personally by Mr. Molins! (I am not implying *he* falsified the document but it’s a fact that various documents have been doctored and it’s extremely disturbing considering we are dealing here with one of the biggest frauds in history).

2019-11-04: CEO of McDonald’s Corporation Steve Easterbrook is fired over a non-physical consensual relationship.

2020-08-10: McDonald’s sues former CEO Steve Easterbrook, accusing him of lying and fraud. He is also accused of destroying evidence “McDonald’s lawyers hadn’t found the emails during the initial investigation because Mr. Easterbrook had deleted them from his phone, the company said.” (Source: NYTimes 2020-08-10). “That accusation has now ignited a rare public war between a major company and its former leader: **McDonald’s filed a lawsuit on Monday against Mr. Easterbrook, accusing him of lying, concealing evidence and fraud.**”

2021-07-02: In an NYTimes interview, to the question “What was your relationship with Steve like before everything happened, and how is it now?” Mr. Kempczinski answers “Steve brought me into the company, so there’s certainly gratitude. [...] How it unfolded was obviously disorienting and disappointing and upsetting [...]. But there was also that sense of: I know his family. I know his kids.” **Easterbrook and Kempczinski were very very close.**

Only a serious and impartial criminal investigation can determine what really happened. But I feel like there has been a powerful invisible hand protecting McDonald’s France for many years. It’s impossible to fit within 2 pages what happened in France. But either the French authorities are dangerously incompetent, or they have been corrupted. And one doesn’t necessarily exclude the other. Many public/legal/court documents have been falsified/doctored. No judicial system can be so incompetent. I want witness protection, protection from the French authorities.