

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
v.)
) Crim. No. 17-201-01 (ABJ)
PAUL J. MANAFORT, JR.,)
)
Defendant.)

DEFENDANT PAUL J. MANAFORT, JR.'S MOTION
FOR LEAVE TO FILE UNDER SEAL CERTAIN
ATTACHMENTS TO MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Paul J. Manafort, Jr., by and through counsel, hereby moves for leave to file under seal certain attachments to be included with his motion to modify the conditions of his release. The Defendant contends that despite the general policy that public access to judicial proceedings and judicial records is important to the proper functioning of our justice system, there is good cause and compelling reasons in this instance for the two proposed attachments to not be disclosed.

More specifically, the Defendant seeks leave to file under seal Attachments E and F to his proposed motion. These attachments are general net asset statements pertaining to: (1) the Defendant **REDACTED**; and (2) **REDACTED**. Importantly, neither **REDACTED** nor **REDACTED** are parties to the instant case; rather, this information is proposed to be included with the motion for the sole purpose of allowing the Court to perform its proper function – to evaluate the adequacy of the parties' agreed-upon bond package under 18 U.S.C Section 3142 and determine the least restrictive conditions that will reasonably assure the Defendant's appearance as required. *See generally United States v. Xulum*, 84 F.3d 441, 443 (D.C. Cir. 1996) (per curiam).

As part of the agreed-upon bail package with the Office of Special Counsel, **REDACTED** and **REDACTED** have agreed to serve as sureties for Mr. Manafort; thus, they are personally liable should the Defendant not appear as required and should the substantial package of real estate properties being pledged suffer a diminution in value under the secured \$10 million bond amount. The financial statements, therefore, are proposed to be included to demonstrate the sureties' ability to make good on their guarantees.

These statements therefore include private financial information of the Defendant and non-parties that is not available publicly, including the addresses of property, the names of financial institutions where assets are located, and details of the types and amounts of assets and liabilities. The motion for bail modification only provides detailed information with respect to the properties being pledged for bail (174 Jobs Lane, Bridgehampton, NY; 123 Baxter Street, New York, NY; 601 Fairfax Street, Alexandria, VA; and 10 St. James Drive, Palm Beach Gardens, FL.) The proposed disclosures will sufficiently advise the public, but not create unwarranted risk to the Defendant, **REDACTED** and **REDACTED** regarding their finances. The Court has noted on more than one occasion that this case is subject to substantial publicity and media coverage, and the identification of the financial assets and liabilities of these non-parties should be protected.

WHEREFORE, Defendant Manafort moves for leave to file under seal Attachment E and F to his proposed motion to modify conditions of release.

Dated: November 29, 2017

Respectfully submitted,

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