

# **EXHIBIT B**



**U.S. Department of Justice**

*The Special Counsel's Office*

*Washington, D.C. 20530*

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December 1, 2017

**By Hand Delivery and Email**

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(Counsel for Richard W. Gates III)

Re: *United States v. Paul J. Manafort, Jr. & Richard W. Gates III,*  
Crim. No. 17-201 (ABJ)

Dear Messrs. Downing & Wu:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find the government's third discovery production in the above-referenced case. Enclosed with this letter are (1) a thumb drive, (2) a hard drive, and (3) for defendant Gates only, a CD. All media are protected by a password that will be sent to you under separate cover. This production, and all others, are covered by the Protective Order entered by the Court on November 15, 2017.

**Contents of the Enclosed Thumb Drive**

The enclosed thumb drive contains 19 numbered attachments, as set forth below.

- ***Search Warrant Applications and Related Materials***

Enclosed are copies of several additional search warrants and search warrant affidavits detailed in the chart below. Redactions have been made to protect the identity of individuals who provided information and to protect the government's ongoing investigation.

<b>Attachment #</b>	<b>Document</b>
1	Warrant, Application, and Affidavit for search of [REDACTED]@dmpint.com
2	Warrant, Application, and Affidavit for search of [REDACTED]@dmpint.com
3	Warrant, Application, and Affidavit for search of [REDACTED]@dmpint.com and [REDACTED]@dmpint.com
4	Warrant, Application, and Affidavit for search of [REDACTED]@me.com
5	Warrant, Application, and Affidavit for search of [REDACTED]@gmail.com
6	Warrant, Application, and Affidavit for search of Hard Drive with Serial Number WXB1AA006666
7	Warrant, Application, and Affidavit for search of bank account no. [REDACTED]
8	Warrant, Application, and Affidavit for search of bank account no. [REDACTED]
9	Warrant, Application, and Affidavit for search of bank account no. [REDACTED]
10	Warrant, Application, and Affidavit for search of [REDACTED]@me.com
11	Warrant, Application, and Affidavit for search of the Dropbox account for [REDACTED]@gmail.com

- ***Defendants' Deposition Testimony***

Enclosed are copies of deposition testimony from the defendants Gates and Manafort, and [REDACTED], in the matter captioned *In re: Application of Kris Beighton et al.*, Case No. 1:15-mc-20 in the United State District Court for the Eastern District of Virginia. Both written transcripts and video of the testimony are being produced, as set forth below:

Attachment #	Document Description
12	Video of Testimony by Richard W. Gates III on November 16, 2015
13	Video of Testimony by [REDACTED] on November 30, 2015
14	Video of Testimony by Richard W. Gates III on December 2, 2015
15	Video of Testimony by Paul J. Manafort Jr. on December 16, 2015
16	Transcript of Testimony by Richard Gates III on November 16, 2015
17	Transcript of Testimony by [REDACTED] on November 30, 2015
18	Transcript of Testimony by Richard Gates III on December 2, 2015
19	Transcript of Testimony by Paul Manafort Jr. on December 16, 2015

#### Contents of the Enclosed CD (Produced to Gates only)

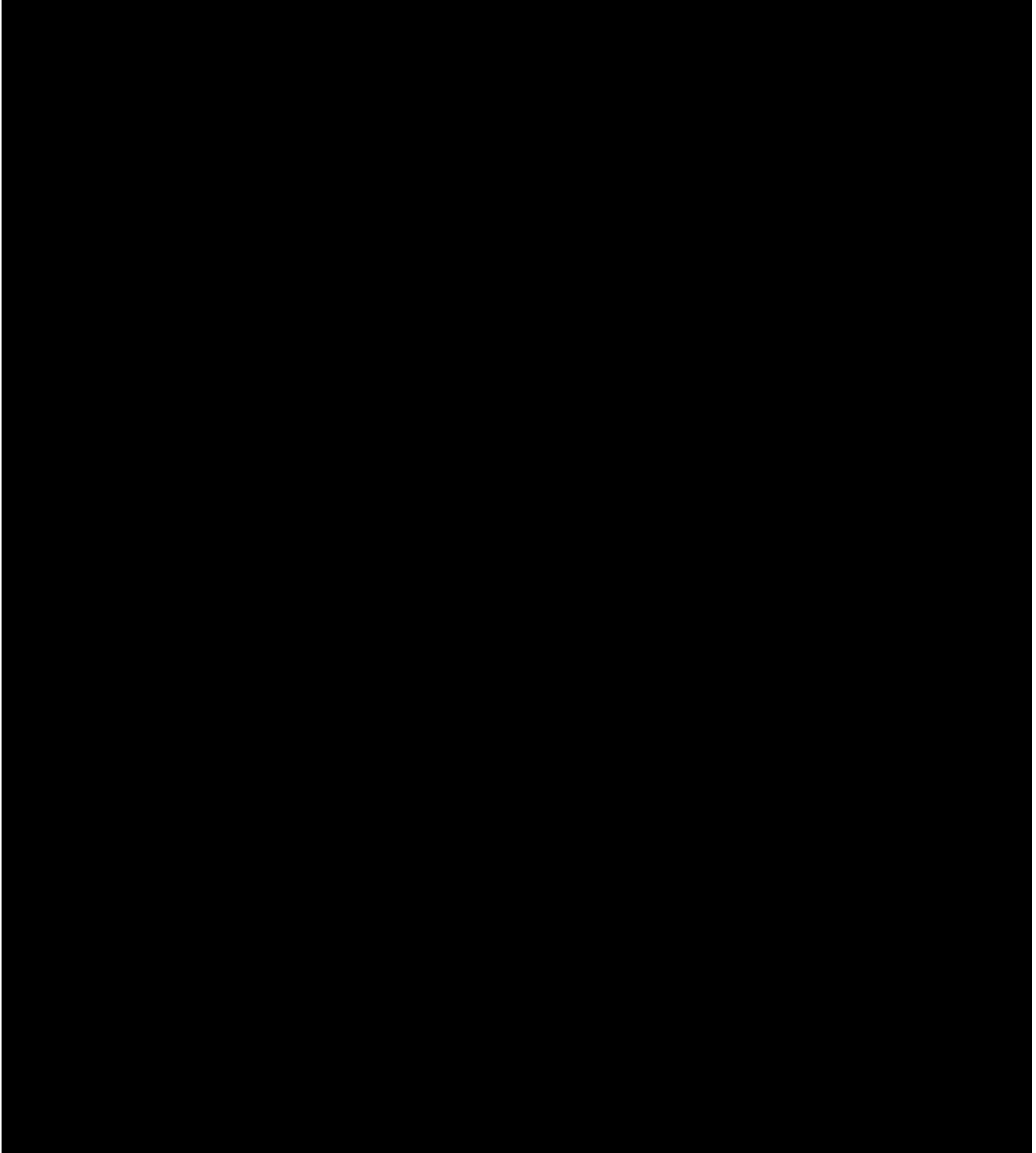
Also enclosed for the defendant Gates is a CD containing copies of materials found on nine devices seized (or imaged) during the search of the defendant Manafort's residence at [REDACTED]. The files are being produced as AD1 Image files, which can be viewed by using publicly available software that can be downloaded for free. If you have any questions or concerns about accessing these documents, please do not hesitate to contact us.

As previously noted, the government is not producing privileged material from these devices. Any questions about privileged material or issues should be directed to [REDACTED] at (202) [REDACTED], who we understand has already reached out to counsel for both defendants. Additionally, the government has endeavored to segregate out, from the material being produced, documents that are irrelevant to this matter. Given the volume of devices and electronic records, the government has relied on an automated process to remove certain categories of records that the government expects to be irrelevant. If you would like to discuss in further detail what this process entails, please let us know. Additionally, if you wish to examine any of the material removed from this (or any future) production through this automated process for identifying irrelevant material, please contact us to discuss and to arrange a mutually agreeable time.

These documents are not being reproduced to defendant Manafort, as he has already been provided with access to this material.

#### Contents of the Enclosed Hard Drive

Finally, the enclosed hard drive contains approximately 80,000 separate items, encompassing Bates numbers DOJSCO-401362401 – DOJSCO-401790274. These documents are in load-ready format for any e-discovery platform. An index for the hard drive is as follows:





As previously noted, you may examine the physical evidence discoverable under Rule 16, including original documents, by calling the undersigned to arrange a mutually convenient time.

If you have any questions about this production or any further discovery, please do not hesitate to contact us.

Very truly yours,

ROBERT S. MUELLER, III  
Special Counsel

By: /s/

\_\_\_\_\_  
Andrew Weissmann  
(202) [REDACTED]

Greg D. Andres  
(202) [REDACTED]

Kyle R. Freeny  
(202) [REDACTED]

Enclosures  
cc: [REDACTED]