

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

Crim. No. 17-cr-201-1 (ABJ)

JOINT PRETRIAL STATEMENT

Pursuant to the Court's Scheduling Order entered March 1, 2018 (Doc. 217, at 2–3), the government hereby submits a joint pretrial statement. The defendant's position was communicated by email to the government on the afternoon of August 24, 2018 and is set out in each respective portion of the submission.

a) Joint Statement of the Case

A proposed joint statement of the case for the Court to read to prospective jurors is attached to this submission as Exhibit A. The government transmitted the proposed joint statement of the case to defense counsel on July 23, 2018 as part of its proposed jury instructions and separately sent the proposed statement of the case to defense counsel in a standalone email on July 27, 2018.

- Defendant's position: "Defendant objects to the description of the FARA violation (bullet point 3) and suggests that it should read: 'Between approximately 2008 and 2014 failing to register as an agent of a foreign principal in violation of FARA (Count Three).'" The defendant agrees to the remainder of the proposed joint statement of the case.

b) Estimate of the Number of Trial Days

The government anticipates that its case-in-chief will last approximately ten to twelve trial days.

- Defendant's position: "Defendant has not determined whether he will present a defense case. Any defense case will require between three to four trial days."

c) List of Outstanding Motions in Limine

Both parties filed their motions in limine on July 9, 2018 (Doc. 341 & 343) and responses to the motions on July 23, 2018 (Doc. 360 & 361). The government has sought leave to supplement its motions in limine in light of proceedings in the Eastern District of Virginia. (Doc. 366, 381, and 382). The following motions in limine are outstanding:

Government's Motions

- (1) The government's motion in limine for an order precluding "argument or evidence at trial (1) concerning selective or vindictive prosecution or the motive and mandate of the Department of Justice office leading this prosecution, or (2) suggesting that any government investigation into Manafort that preceded the Special Counsel's appointment ended with a decision not to prosecute him." (Docs. 341 & 381).
- (2) The government's motion in limine for an order precluding the defendant from presenting argument at trial, or soliciting evidence concerning, (a) the absence of a civil Internal Revenue Service audit of Manafort or his companies or (b) the absence of any civil Foreign Agents Registration Act action against Manafort or his companies, or suggesting that such civil audits or actions were necessary or that the absence of such civil audits or actions was improper, indicative of a lack of evidence of a crime. (Doc. 366).

- (3) The government's motion in limine seeking to admit evidence that two U.S. businesses, Davis Manafort Partners, Inc. and DMP International, LLC, never filed FBARs for the foreign bank accounts identified in the superseding indictment. (Doc. 382).

Defendant's Motions

- (1) The defendant's motion in limine seeking to preclude evidence or argument concerning Mr. Manafort's role with the Trump campaign and allegations related to purported collusion with the Russian government. (Doc. 343, at 1–3). The government has raised a limited objection to the motion. (Doc. 360, at 2–4).
- (2) The defendant's motion in limine seeking to preclude evidence or argument about the charges brought in *United States v. Manafort*, No. 1:18-cr-83 (E.D.V.A.). (Doc. 343, at 3–5). The government has raised a limited objection to the motion. (Doc. 360, at 4–5). The government also notes below that it intends to introduce the defendant's convictions for purposes of impeachment, pursuant to Federal Rule of Evidence 609.
- (3) The defendant's motion in limine seeking to preclude evidence or argument about the defendant's remand to the custody of the U.S. Marshal Service pending trial. (Doc. 343, at 5). The government has no objection to the motion. (Doc. 360).
- (4) The defendant's motion in limine seeking to preclude testimony and evidence from attorneys who “provided Mr. Manafort with FARA related advice and represented him in interactions with the U.S. Department of Justice's FARA office.” (Doc. 343, at 6). The government has set forth its objection, noting that the defendant's purported claim of privilege has been considered and rejected by Chief Judge Howell. (Doc. 360, at 5–8).

d) Proposed Jury Instructions

A copy of the government's proposed instructions (including instructions from the Standardized Criminal Jury Instructions for the District of Columbia) is attached to this submission as Exhibit B. A copy of the government's proposed instructions was sent to defense counsel on July 24, 2018. A copy of the government's proposed special jury instructions is attached to this submission as Exhibit C.¹ A copy of these proposed instructions was sent to defense counsel on July 23, 2018.

- Defendant's position: "Defendant objects to the instructions submitted by the government identified in the list below. Defendant will file a separate pleading as soon as possible addressing those objections and requesting changes or additional instructions:

Instruction No. 1	Instruction No. 26
Instruction No. 2	Instruction No. 27
Instruction No. 13	Instruction No. 28
Instruction No. 14	Instruction No. 29
Instruction No. 15	Instruction No. 32
Instruction No. 16	Instruction No. 33
Instruction No. 17	Instruction No. 34
Instruction No. 18	Instruction No. 46
Instruction No. 19	Special Instruction No. 1
Instruction No. 20	Special Instruction No. 2
Instruction No. 21	Special Instruction No. 3
Instruction No. 22	Special Instruction No. 4
Instruction No. 23	Special Instruction No. 5
Instruction No. 24	Special Instruction No. 6"
Instruction No. 25	

¹ These special instructions address certain legal requirements imposed by the Foreign Agent Registration Act ("FARA") (22 U.S.C. § 612 *et seq.*), the Lobbying Disclosure Act ("LDA") (2 U.S.C. § 1601 *et seq.*), and associated regulations issued pursuant to and implementing both federal laws.

The defendant indicated that he does not object to instructions 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 30, 31, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, and 57, as submitted in Exhibit B.

e) List of Expert Witnesses

The government's notice of expert testimony is attached as Exhibit D. The government gave this notice to the defendant on July 13, 2018.

- Defendant's position: "To the extent the defendant decides to present a defense case, defendant anticipates presenting the testimony of expert witnesses in the following areas: (1) money laundering and (2) the Foreign Agent's Registration Act. Defendant is still in the process of identifying and retaining experts. Defendant will provide additional information when it becomes available."

f) List of Prior Convictions

Pursuant to Federal Rule of Evidence 609(a)(2), should the defendant testify in the upcoming trial, the government intends to offer for purpose of impeachment the defendant's prior convictions in the case *United States v. Manafort*, No. 1:18-cr-83 (E.D. Va.), including his convictions on five counts of filing of false individual income tax returns (in violation of 26 U.S.C. § 7206(1)); one count of failing to file a report of a foreign bank and financial account (in violation of 31 U.S.C. §§ 5314 and 5322(a)); and two counts of bank fraud (in violation of 18 U.S.C. § 1344). The government hereby gives notice as required under Federal Rule of Evidence 609(b)(2).

g) List of Exhibits

A copy of the government's exhibit list is attached to this submission as Exhibit E, and the government has delivered copies of the exhibits to the Court's chambers as directed in the

Scheduling Order. Given the voluminous nature of the exhibits, the government has included draft summary exhibits that it intends to offer pursuant to Federal Rule of Evidence 1006. The government will submit to the Court revised summary exhibits at a later date in advance of trial. The government requests the Court's permission to amend its exhibits in advance of trial as needed during the course of trial preparation. The summary exhibits are Government Exhibits 81, 90, 304, 308, 318, 319, 325, 335, and 400-46.

Beginning in mid-July 2018, the government identified its trial exhibits to defense counsel on a rolling basis.² The government identified its trial exhibits (from previously produced documents) in six tranches, which were sent to defense counsel on July 19, 2018; July 20, 2018; July 23, 2018; July 24, 2018; July 28, 2018, all in anticipation of an August 1, 2018 submission of the Joint Pretrial Statement. For ease of reference, an August 21, 2018 transmission combined the prior transmissions into a single exhibit list with relevant updates, including eliminating various exhibits pursuant to the Court's Minute Order.

On the evening of August 23, 2018, the defendant requested that the government reproduce all of its exhibits in electronic format. The government arranged for defense counsel to pick up an electronic copy of the exhibits at 8:45 AM on August 24, 2018.

- Defendant's Position: On the afternoon of August 24, 2018, the defendant wrote to the government:

The defendant received the government's most recent exhibit list containing more than 1500 marked exhibits on August 22, 2018. In order to assist the defendant in reviewing the proposed exhibits, at the defendant's request, the government provided electronic copies of the exhibits on August 24, 2018. Defendant and his counsel

² In each correspondence, the government identified the exhibits by Bates number, date of the document, and the source of the exhibit. The government also provided a short description of the exhibit to counsel, and, where applicable, a cross-reference to the equivalent Eastern District of Virginia exhibit number.

require additional time to review the government's proposed exhibits in order to lodge appropriate objections. At this time, defendant objects to all of the government's proposed exhibits as to authenticity and admissibility. Defendant will provide the Court with a more detailed recitation of objections by exhibit as soon as possible.

[. . .]

The defense has not yet identified exhibits that may be used in cross-examination and will not be able to identify exhibits that may be used in any defense case-in-chief until after the government presents its case-in-chief.

h) Stipulations

A copy of the government's proposed stipulations are attached as Exhibit F. The government transmitted the first of these stipulations on July 23, 2018. The government notes that many of these stipulations are the same in substance to those agreed to by the defendant and the government in *United States v. Manafort*, No. 1:18-cr-083 (E.D.V.A.).

- Defendant's Position: "The government has provided the defendant with approximately 23 proposed stipulations for review. At this time, there are no agreed upon stipulations."

i) Judicial Notice

As described above, the government has submitted a proposed series of special jury instructions, attached to this submission as Exhibit C. These special instructions address certain legal requirements imposed by FARA, the LDA, and associated regulations implementing both federal laws.

Alternatively, the Court could take judicial notice of the same legal and regulatory requirements pursuant to Federal Rule of Evidence 201. *See, e.g., United States v. Titus*, 475 F. App'x 826, 834–35 (4th Cir. 2012) (affirming, in a federal fraud case, district court taking judicial notice of "certain Virginia rules and statutes," including the Virginia Consumer Real Estate

Settlement Protection Act and “associated state regulations, which imposed duties on Titus”); *see also United States v. Montgomery*, 896 F.3d 875, 879 (8th Cir. 2018) (noting, with respect to the fact that U.S. Food and Drug Administration regulations prohibit sale of health foods with hemp seeds and hemp oil containing THC, that “if challenged, the government could have established this regulatory fact by judicial notice”); *Staehr v. Hartford Fin. Servs. Group, Inc.*, 547 F.3d 406, 425 (2d Cir. 2008) (“[I]t is proper to take judicial notice of the fact that . . . regulatory filings contained certain information, without regard to the truth of their contents”); *United States v. Knauer*, 707 F. Supp. 2d 379, 400 (E.D.N.Y. 2010) (“It is undoubtedly within this Court’s authority to take judicial notice of agency regulations, including those issued by an administrative subunit.”).

- Defendant’s Position: The defendant objects to these special jury instructions (or, alternatively, the Court’s taking judicial notice). *See supra* Section (d) (position on Special Instructions 1–6).

j) Proposed Verdict Form

A copy of the government’s proposed verdict form is attached as Exhibit G.

- Defendant’s Position: No proposed verdict form given.

Respectfully submitted,

ROBERT S. MUELLER, III
Special Counsel

Dated: August 24, 2018

By: /s/ Andrew Weissmann
Andrew Weissmann
Jeannie S. Rhee (D.D.C. Bar No. 464127)
Greg D. Andres (D.D.C. Bar No. 459221)
U.S. Department of Justice
Special Counsel’s Office
950 Pennsylvania Avenue NW
Washington, D.C. 20530
Telephone: (202) 616-0800

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

JOINT STATEMENT OF THE CASE

The grand jury has charged Paul J. Manafort, Jr., in a seven-count indictment. Those charges are:

- Conspiring between approximately 2006 and 2017 to defraud and commit offenses against the United States, including conspiring to violate the Foreign Agents Registration Act (FARA), to make false and misleading statements to the Department of Justice, to file false tax returns, and to fail to file with the Department of the Treasury required reports of foreign bank accounts (Count One);
- Conspiring to launder money from approximately 2006 through 2016 (Count Two);
- Acting between approximately 2008 and 2014 as an agent of a foreign principal without registering, in violation of FARA (Count Three);
- In approximately November 2016 and February 2017, making false and misleading statements to the Department of Justice (Counts Four and Five); and
- Between February and April 2018, attempting to tamper with witnesses and conspiring to witness tamper (Count Six and Seven).

Respectfully submitted,

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

V.

PAUL J. MANAFORT, JR.,

Defendant

Crim. No. 17-cr-201 (ABJ)

GOVERNMENT'S PROPOSED JURY INSTRUCTIONS

Pursuant to Federal Rule of Criminal Procedure 30, the government respectfully requests the Court to include in its charge to the Jury the following general and special instructions, and further reserves the right to file any other such instructions as may become appropriate during the course of trial.

Respectfully submitted,

ROBERT S. MUELLER, III
Special Counsel

By: /s/
 Andrew Weissmann
 Greg D. Andres
 Special Assistant United States Attorneys
 Special Counsel's Office

U.S. Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530
Phone: (202) 616-0800

Table of Contents

INSTRUCTION NO. 1	6
Preliminary Instruction Before Trial	6
INSTRUCTION NO. 2	15
Preliminary Instruction to Jury Where Identity of Alternates Is Not Disclosed	15
INSTRUCTION NO. 3	16
Cautionary Instruction on the Use of the Internet and Publicity	16
INSTRUCTION NO. 4	17
Furnishing the Jury with a Copy of the Instructions	17
INSTRUCTION NO. 5	18
Function of the Court	18
INSTRUCTION NO. 6	19
Function of the Jury	19
INSTRUCTION NO. 7	20
Jury’s Recollection Controls	20
INSTRUCTION NO. 8	21
Evidence in the Case—Judicial Notice, Stipulations, Depositions	21
INSTRUCTION NO. 9	22
Statements of Counsel	22
INSTRUCTION NO. 10	23
Indictment Not Evidence	23
INSTRUCTION NO. 11	24
Burden of Proof—Presumption of Innocence	24
INSTRUCTION NO. 12	25
Reasonable Doubt	25
INSTRUCTION NO. 13	26
Count 1: Nature of the Offense	26
INSTRUCTION NO. 14	27
Count 1: Overview of Conspiracy to Defraud the United States	27
INSTRUCTION NO. 15	28
Count 1: Essential Elements of Conspiracy to Defraud the United States	28
INSTRUCTION NO. 16	31

Count 1: Overview of Conspiracy to Commit an Offense Against the United States	31
INSTRUCTION NO. 17	32
Count 1: Essential Elements of Conspiracy to Commit an Offense Against the United States	32
Elements of the Conspiracy’s Objects	33
Unanimity—Special—Conspiracy	36
INSTRUCTION NO. 18	38
Count 2: Nature of the Offense	38
INSTRUCTION NO. 19	40
Count 2: Essential Elements of the Offenses Charged.....	40
Elements of the Conspiracy’s Objects	41
Unanimity—Special—Money Laundering	42
INSTRUCTION NO. 20	44
Count 3: Nature of the Offense	44
INSTRUCTION NO. 21	45
Count 3: Essential Elements of the Offense Charged	45
INSTRUCTION NO. 22	47
Count 4: Nature of the Offense	47
INSTRUCTION NO. 23	48
Count 4: Essential Elements of the Offense Charged	48
INSTRUCTION NO. 24	50
Count 5: Nature of the Offense	50
INSTRUCTION NO. 25	51
Count 5: Essential Elements of the Offense Charged	51
INSTRUCTION NO. 26	54
Count 6: Statute Defining the Offense Charged	54
INSTRUCTION NO. 27	56
Count 7: Nature of the Offense	56
INSTRUCTION NO. 28	57
Count 7: Essential Elements of the Offense Charged	57
INSTRUCTION NO. 29	59
Direct and Circumstantial Evidence.....	59
INSTRUCTION NO. 30	60
Inadmissible and Stricken Evidence	60
INSTRUCTION NO. 31	61

Law Enforcement Techniques.....	61
INSTRUCTION NO. 32	62
Credibility of Witnesses	62
INSTRUCTION NO. 33	64
Accomplice's and Cooperator's Testimony	64
INSTRUCTION NO. 34	67
Testimony of Immunized Witnesses (<i>If Applicable</i>).....	67
INSTRUCTION NO. 35	68
Law Enforcement Officer's Testimony.....	68
INSTRUCTION NO. 36	69
Right of Defendant Not to Testify (<i>If Applicable</i>)	69
INSTRUCTION NO. 37	70
Defendant as Witness (<i>If Applicable</i>).....	70
INSTRUCTION NO. 38	71
False or Inconsistent Statement by Defendant	71
INSTRUCTION NO. 39	72
Character of Defendant (<i>If Applicable</i>).....	72
INSTRUCTION NO. 40	73
Specialized Opinion Testimony (<i>If Applicable</i>).....	73
INSTRUCTION NO. 41	74
Evaluation of Prior Inconsistent Statement of a Witness (<i>If Applicable</i>)	74
INSTRUCTION NO. 42	76
Evaluation of Prior Consistent Statement of a Witness	76
INSTRUCTION NO. 43	77
Impeachment by Proof of Conviction of a Crime—Witness	77
INSTRUCTION NO. 44	78
Impeachment by Proof of Conviction of Pending Case, Probation Or Parole (<i>If Applicable</i>) .	78
INSTRUCTION NO. 45	79
Attempted Bribery, Coercion or Intimidation of Witness	79
INSTRUCTION NO. 46	80
Statements of the Defendant—Substantive Evidence.....	80
INSTRUCTION NO. 47	81
Translation of Foreign Language Document or Recording	81
INSTRUCTION NO. 48	82

Evidence of Other Crimes Admitted to Show Motive, Identity, or Common Scheme or Plan (<i>If Applicable</i>)	82
INSTRUCTION NO. 49	84
Evidence of Other Crimes Admitted to Show Intent, Absence of Mistake, or Knowledge (<i>If Applicable</i>)	84
INSTRUCTION NO. 50	85
Multiple Counts—One Defendant	85
INSTRUCTION NO. 51	86
Unanimity—General	86
INSTRUCTION NO. 52	87
Verdict Form Explanation	87
INSTRUCTION NO. 53	88
Proof of State of Mind.....	88
INSTRUCTION NO. 54	89
Willfully Causing an Act to be Done.....	89
INSTRUCTION NO. 55	90
“On or About” or “In or Around” Proof	90
INSTRUCTION NO. 56	91
Aiding and Abetting.....	91

INSTRUCTION NO. 1

Preliminary Instruction Before Trial

Before we begin the trial, I want to explain some of the legal rules that will be important in this trial. I want to emphasize that these remarks are not meant to be a substitute for the detailed instructions that I will give at the end of the trial just before you start your deliberations. These preliminary instructions are intended to give you a sense of what will be going on in the courtroom and what your responsibilities as jurors will be.

When you took your seats, you probably noticed that each of you had a notebook and pencil waiting for you. That is because I permit jurors to take notes during trial if they wish. Whether you take notes or not is entirely up to you. Many people find that taking notes helps them remember testimony and evidence; others find it distracts them from listening to the witnesses.

You will be permitted to take your notebooks back with you into the jury room during deliberations. You should remember, however, that your notes are only an aid to your memory. They are not evidence in the case, and they should not replace your own memory of the evidence. Those jurors who do not take notes should rely on their own memory of the evidence and should not be influenced by another juror's notes.

Other than during your deliberations, the notebooks will remain locked in the courtroom during recesses and overnight. You will not be able to take the notebooks with you as you come and go and you will not be permitted to take them home with you overnight. At the end of the trial, when you come back to the courtroom to deliver your verdict, your notebooks will be collected, and the pages torn out and destroyed. No one, including myself, will ever look at any notes you have taken, so you may feel free to write whatever you wish.

Now let me explain briefly some of the procedures we will follow and some of the rules of law that will be important in this case. This is a criminal case that began when a grand jury sitting in this district returned an indictment of the defendant.

The grand jury has charged Paul J. Manafort, Jr., in a seven-count indictment. Those charges are:

- Conspiring between approximately 2006 and 2017 to defraud and commit offenses against the United States, including conspiring to violate the Foreign Agents Registration Act (FARA), to make false and misleading statements to the Department of Justice, to file false tax returns, and to fail to file with the Department of the Treasury required reports of foreign bank accounts (Count One);
- Conspiring to launder money from approximately 2006 through 2016 (Count Two);
- Acting between approximately 2008 and 2014 as an agent of a foreign principal without registering, in violation of the Foreign Agents Registration Act (FARA) (Count Three);
- In approximately November 2016 and February 2017, making false and misleading statements to the Department of Justice (Counts Four and Five); and
- Between February and April 2018, attempting to tamper with witnesses and conspiring to witness tamper (Count Six and Seven).

An indictment is not evidence of a defendant's guilt. It is merely the means by which charges are brought in a criminal case. You should understand clearly that the indictment that I just summarized is not evidence. The indictment is just a formal way of charging a person with a crime in order to bring him/her to trial. You must not think of the indictment as any evidence of the guilt of the defendant, or draw any conclusion about the guilt of the defendant just because he has been indicted.

Every defendant in a criminal case is presumed to be innocent. This presumption of innocence remains with the defendant throughout the trial unless and until he is proven guilty beyond a reasonable doubt. The burden is on the government to prove the defendant guilty beyond a reasonable doubt, and that burden of proof never shifts throughout the trial. The law does not require a defendant to prove his/her innocence or to produce any evidence. If you find that the government has proven beyond a reasonable doubt every element of a particular offense with which the defendant is charged, it is your duty to find him/her guilty of that offense. On the other hand, if you find that the government has failed to prove any element of a particular offense beyond a reasonable doubt, you must find the defendant not guilty of that offense.

As I explain how the trial will proceed, I will refer to the “government” and to the “defense” or the “defendant.” When I mention the “government,” I am referring to the prosecutors. When I mention the defendant or the defense, I am referring either to the defendant Paul Manafort or to his attorneys.

As the first step in this trial, the government and the defendant will have an opportunity to make opening statements. The defendant may make an opening statement immediately after the government’s opening statement or he may wait until the beginning of the defendant’s case, or he may choose not to make an opening statement at all. You should understand that the opening statements are not evidence. They are only intended to help you understand the evidence that the lawyers expect will be introduced.

After the opening statement or statements, the government will put on what is called its case-in-chief. This means that the government will call witnesses to the witness stand and ask them questions. This is called direct examination. When the government is finished, the defense may ask questions. This is called cross-examination. When the defense is finished, the government may

have brief re-direct examination. After the government presents its evidence, the defendant may present evidence, but he is not required to do so. The law does not require a defendant to prove his innocence or to produce any evidence. If the defense does put on evidence, Mr. Downing or his co-counsel will call witnesses to the stand and ask questions on direct examination, Mr. Weissmann or his co-counsel will cross-examine, and Mr. Downing or his co-counsel may have brief re-direct examination. When the defense is finished, the government may offer a rebuttal case, which would operate along the same lines as its case-in-chief.

At the end of all of the evidence, each side will have an opportunity to make a closing argument in support of its case. The lawyers' closing arguments, just like their opening statements, are not evidence in this case. They are only intended to help you understand the evidence.

Finally, at the end of the evidence and after both sides have finished closing arguments, I will tell you in detail about the rules of law that you must follow when you consider what your verdicts shall be. Your verdicts must be unanimous; that is, all twelve jurors must agree on the verdicts.

I want to briefly describe my responsibilities as the judge and your responsibilities as the jury. My responsibility is to conduct this trial in an orderly, fair, and efficient manner, to rule on legal questions that come up in the course of the trial, and to instruct you about the law that applies to this case. It is your sworn duty as jurors to accept and apply the law as I state it to you.

Your responsibility as jurors is to determine the facts in the case. You—and only you—are the judges of the facts. You alone determine the weight, the effect, and the value of the evidence, as well as the credibility or believability of the witnesses. You must consider and weigh the testimony of all witnesses who appear before you. You alone must decide the extent to which you believe any witness.

You must pay very careful attention to the testimony of all of the witnesses because you will not have any transcripts or summaries of the testimony available to you during your deliberations. You will have to rely entirely on your memory and your notes if you choose to take any.

During this trial, I may rule on motions and objections by the lawyers, make comments to lawyers, question the witnesses, and instruct you on the law. You should not take any of my statements or actions as any indication of my opinion about how you should decide the facts. If you think that somehow I have expressed or even hinted at any opinion as to the facts in this case, you should disregard it. The verdict in this case is your sole and exclusive responsibility.

You may consider only the evidence properly admitted in this case. That evidence includes the sworn testimony of witnesses and the exhibits admitted into evidence. Sometimes a lawyer's question suggests the existence of a fact, but the lawyer's question alone is not evidence. If the evidence includes anything other than testimony and exhibits, I will instruct you about these other types of evidence when they are admitted during the trial.

During the trial, if the court or a lawyer makes a statement or asks a question that refers to evidence that you remember differently, you should rely on your memory of the evidence during your deliberations.

The lawyers may object when the other side asks a question, makes an argument, or offers evidence that the objecting lawyer believes is not properly admissible. You must not hold such objections against the lawyer who makes them or the party s/he represents. It is the lawyer's responsibility to object to evidence that they believe is not admissible.

If I sustain an objection to a question asked by a lawyer, the question must be withdrawn, and you must not guess or speculate what the answer to the question would have been. If a question

is asked and answered, and I then rule that the answer should be stricken from the record, you must disregard both the question and the answer in your deliberations. You should follow this same rule if any of the exhibits are stricken.

You are not permitted to discuss this case with anyone until this case is submitted to you for your decision at the end of my final instructions. This means that, until the case is submitted to you, you may not talk about it even with your fellow jurors. This is because we don't want you making decisions until you've heard all the evidence and the instructions of law. In addition, you may not talk about the case with anyone else. It should go without saying that you also may not write about the case electronically through any blog, posting, or other communication, including "social networking" sites such as Facebook or Twitter until you have delivered your verdict and the case is over. This is because you must decide the case based on what happens here in the courtroom, not on what someone may or may not tell you outside the courtroom. I'm sure that, when we take our first recess, you will call home or work and tell them you have been selected for a jury. They will undoubtedly ask what kind of case you're sitting on. You may tell them it is a criminal case, but nothing else. Now, when the case is over, you may discuss any part of it with anyone you wish, but until then, you may not do so.

Although it is a natural human tendency to talk with people with whom you may come into contact, you must not talk to any of the parties, their attorneys, or any witnesses in this case during the time you serve on this jury. If you encounter anyone connected with the case outside the courtroom, you should avoid having any conversation with them, overhearing their conversation, or having any contact with them at all. For example, if you find yourself in a courthouse corridor, elevator, or any other location where the case is being discussed by attorneys, parties, witnesses, or anyone else, you should immediately leave the area to avoid hearing such discussions. If you

do overhear a discussion about the case, you should report that to me as soon as you can. Finally, if you see any of the attorneys or witnesses involved in the case and they turn and walk away from you, they are not being rude; they are merely following the same instruction that I gave to them.

It is very unlikely, but if someone tries to talk to you about the case, you should refuse to do so and immediately let me know by telling the clerk or the marshal. Don't tell the other jurors; just let me know, and I'll bring you in to discuss it.

Between now and when you are discharged from jury duty, you must not provide to or receive from anyone, including friends, co-workers, and family members, any information about your jury service. You may tell those who need to know where you are, that you have been picked for a jury, and how long the case may take. However, you must not give anyone any information about the case itself or the people involved in the case. You must also warn people not to try to say anything to you or write to you about your jury service or the case. This includes face-to-face, phone, or computer communications.

In this age of electronic communication, I want to stress that you must not use electronic devices or computers to talk about this case, including tweeting, texting, blogging, e-mailing, posting information on a website or chat room, or any other means at all. Do not send or accept messages, including email and text messages, about your jury service. You must not disclose your thoughts about your jury service or ask for advice on how to decide any case.

You must decide the facts based on the evidence presented in court and according to the legal principles about which I will instruct you. You are not permitted, during the course of the trial, to conduct any independent investigation or research about the case. That means, for example, you cannot use the Internet to do research about the facts or the law or the people involved in the

case. Research includes something even as simple or seemingly harmless as using the Internet to look up a legal term or view a satellite photo of the scene of the alleged crime.

I want to explain the reasons why you should not conduct your own investigation. All parties have a right to have the case decided only on evidence and legal rules that they know about and that they have a chance to respond to. Relying on information you get outside this courtroom is unfair because the parties would not have a chance to refute, correct, or explain it. Unfortunately, information that we get over the Internet or from other sources may be incomplete or misleading or just plain wrong. It is up to you to decide whether to credit any evidence presented in court and only the evidence presented in court may be considered. If evidence or legal information has not been presented in court, you cannot rely on it.

Moreover, if any of you do your own research about the facts or the law, this may result in different jurors basing their decisions on different information. Each juror must make his or her decision based on the same evidence and under the same rules.

In this case, there may be reports in the newspaper or on the radio, Internet, or television concerning the case while the trial is ongoing. You may be tempted to read, listen to, or watch it. You must not read, listen to, or watch such reports because you must decide this case solely on the evidence presented in this courtroom. If any publicity about this trial inadvertently comes to your attention during trial, do not discuss it with other jurors or anyone else. Just let me or my clerk know as soon after it happens as you can, and I will then briefly discuss it with you.

After I submit the case to you, you may discuss it only when I instruct you to do so, and only in the jury room and only in the presence of all your fellow jurors. It is important that you keep an open mind and not decide any issue in the case until after I submit the entire case to you with my final instructions.

Authority: Barbara E. Bergman, *Criminal Jury Instructions for the District of Columbia* (5th ed., 2017 release) (“The Redbook”), Instructions No. 1.102, 1.105.

INSTRUCTION NO. 2

Preliminary Instruction to Jury Where Identity of Alternates Is Not Disclosed

You have probably noticed that there are fourteen (14) of you sitting in the jury box. Only twelve (12) of you will retire to deliberate in this matter. Before any of you even entered the courtroom, we randomly selected the alternates' seats. I will not disclose who the alternate jurors are until the end of my final instructions just before you begin your deliberations. As any seat might turn out to be an alternate's seat, it is important that each of you think of yourselves as regular jurors during this trial, and that all of you give this case your fullest and most serious attention.

Authority: Redbook, Instruction No. 1.107.

INSTRUCTION NO. 3

Cautionary Instruction on the Use of the Internet and Publicity

You may not communicate with anyone not on the jury about this case. As I explained earlier, this includes any electronic communication such as emailing or texting or any blogging about the case. In addition, you may not conduct any independent investigation before or during deliberations. This means you may not conduct any research in person or electronically via the Internet or in any other way.

In some cases, there may be reports in the newspaper or on the radio, Internet, or television concerning the case while the trial is going on. If there should be such media coverage in this case, you may be tempted to read, listen to, or watch it. You must not read, listen to, or watch such reports because you must decide this case solely on the evidence presented in this courtroom. If any publicity about this trial inadvertently comes to your attention during trial, do not discuss it with other jurors or anyone else. Just let me or my clerk know as soon after it happens as you can, and I will then briefly discuss it with you.

Authority: Redbook, Instruction No. 1.202.

INSTRUCTION NO. 4

Furnishing the Jury with a Copy of the Instructions

I will provide you with a copy of my instructions. During your deliberations, you may, if you want, refer to these instructions. While you may refer to any particular portion of the instructions, you are to consider the instructions as a whole and you may not follow some and ignore others. If you have any questions about the instructions, you should feel free to send me a note. Please return your instructions to me when your verdict is rendered.

Authority: Redbook, Instruction No. 2.100.

INSTRUCTION NO. 5

Function of the Court

My function is to conduct this trial in an orderly, fair, and efficient manner; to rule on questions of law; and to instruct you on the law that applies in this case.

It is your duty to accept the law as I instruct you. You should consider all the instructions as a whole. You may not ignore or refuse to follow any of them.

Authority: Redbook, Instruction No. 2.101.

INSTRUCTION NO. 6

Function of the Jury

Your function, as the jury, is to determine what the facts are in this case. You are the sole judges of the facts. While it is my responsibility to decide what is admitted as evidence during the trial, you alone decide what weight, if any, to give to that evidence. You alone decide the credibility or believability of the witnesses.

You should determine the facts without prejudice, fear, sympathy, or favoritism. You should not be improperly influenced by anyone's race, ethnic origin, or gender. Decide the case solely from a fair consideration of the evidence.

You may not take anything I may have said or done as indicating how I think you should decide this case. If you believe that I have expressed or indicated any such opinion, you should ignore it. The verdict in this case is your sole and exclusive responsibility.

Authority: Redbook, Instruction No. 2.102.

INSTRUCTION NO. 7

Jury's Recollection Controls

If any reference by me or the attorneys to the evidence is different from your own memory of the evidence, it is your memory that should control during your deliberations.

Authority: Redbook, Instruction No. 2.103.

INSTRUCTION NO. 8

Evidence in the Case—Judicial Notice, Stipulations, Depositions

During your deliberations, you may consider only the evidence properly admitted in this trial. The evidence in this case consists of the sworn testimony of the witnesses, the exhibits that were admitted into evidence, the facts of which I took judicial notice, and the facts and testimony stipulated to by the parties.

I may take what is called “judicial notice” of public acts, places, facts, and events that I consider to be matters of common knowledge or matters that can be determined easily through undisputed sources. In this case, I took judicial notice of [describe fact of which the court took judicial notice]. When I take judicial notice of a particular fact, you may, if you choose to do so, regard that fact as proven evidence. Because you are the sole judges of the facts, however, you are not required to accept any fact that is judicially noted.

During the trial, you were told that the parties had stipulated—that is, agreed—to certain facts. You should consider any stipulation of fact to be undisputed evidence.

During the trial, you were told that the parties had stipulated—that is, agreed—to what testimony [name of witness] would have given if s/he had testified in this case. You should consider this stipulated testimony to be exactly what s/he would have said had s/he testified here.

When you consider the evidence, you are permitted to draw, from the facts that you find have been proven, such reasonable inferences as you feel are justified in the light of your experience. You should give any evidence such weight as in your judgment it is fairly entitled to receive.

Authority: Redbook, Instruction No. 2.104.

INSTRUCTION NO. 9

Statements of Counsel

The statements and arguments of the lawyers are not evidence. They are only intended to assist you in understanding the evidence. Similarly, the questions of the lawyers are not evidence.

Authority: Redbook, Instruction No. 2.105.

INSTRUCTION NO. 10

Indictment Not Evidence

The indictment is merely the formal way of accusing a person of a crime. You must not consider the indictment as evidence of any kind—you may not consider it as any evidence of Mr. Manafort's guilt or draw any inference of guilt from it.

Authority: Redbook, Instruction No. 2.106.

INSTRUCTION NO. 11

Burden of Proof—Presumption of Innocence

Every defendant in a criminal case is presumed to be innocent. This presumption of innocence remains with the defendant throughout the trial unless and until the government has proven he is guilty beyond a reasonable doubt. This burden never shifts throughout the trial. The law does not require Mr. Manafort to prove his innocence or to produce any evidence at all. If you find that the government has proven beyond a reasonable doubt every element of a particular offense with which Mr. Manafort is charged, it is your duty to find him guilty of that offense. On the other hand, if you find the government has failed to prove any element of a particular offense beyond a reasonable doubt, it is your duty to find Mr. Manafort not guilty of that offense.

Authority: Redbook, Instruction No. 2.107.

INSTRUCTION NO. 12

Reasonable Doubt

The government has the burden of proving Mr. Manafort guilty beyond a reasonable doubt. In civil cases, it is only necessary to prove that a fact is more likely true than not, or, in some cases, that its truth is highly probable. In criminal cases such as this one, the government's proof must be more powerful than that. It must be beyond a reasonable doubt. Reasonable doubt, as the name implies, is a doubt based on reason—a doubt for which you have a reason based upon the evidence or lack of evidence in the case. If, after careful, honest, and impartial consideration of all the evidence, you cannot say that you are firmly convinced of the defendant's guilt, then you have a reasonable doubt.

Reasonable doubt is the kind of doubt that would cause a reasonable person, after careful and thoughtful reflection, to hesitate to act in the graver or more important matters in life. However, it is not an imaginary doubt, nor a doubt based on speculation or guesswork; it is a doubt based on reason. The government is not required to prove guilt beyond all doubt, or to a mathematical or scientific certainty. Its burden is to prove guilt beyond a reasonable doubt.

Authority: Redbook, Instruction No. 2.108.

INSTRUCTION NO. 13

Count 1: Nature of the Offense

Count One of the superseding indictment charges that from in or about and between 2006 and 2017 in the District of Columbia and elsewhere, the defendant knowingly and intentionally conspired to defraud the United States by impeding, impairing, obstructing, and defeating the lawful governmental functions of a government agency, namely the Department of Justice and the Treasury, and to commit offenses against the United States.

A conspiracy is a kind of criminal partnership—a combination or agreement of two or more persons to join together to accomplish some unlawful purpose. There are two types of conspiracy are charged in Count One: first, the defendant is accused of having been a member of a conspiracy to defraud the United States government, and, second, the defendant is accused of having been a member of a conspiracy to violate a number of federal laws. I will explain both of these charges in more detail.

Authority: Superseding Indictment; 2B O'Malley, Grenig and Lee, *Federal Jury Practice and Instructions*, § 67:13 (6th ed. updated through February 2018).

INSTRUCTION NO. 14

Count 1: Overview of Conspiracy to Defraud the United States

As to the first type of conspiracy charged in Count 1, the defendant is charged with conspiring to defraud the United States. It is against the law to agree with someone to defraud the United States or any of its agencies. Congress has deemed it appropriate to make a conspiracy, standing alone, a separate crime, even if it is not successful. This is because collective criminal activity poses a greater potential threat to the public's safety and welfare than individual conduct and increases both the likelihood of success of a particular criminal venture.

In this regard, the charge of conspiracy to defraud the government does not mean that one of the illegal objects must be to cause the government to suffer a loss of money or property as a consequence of the conspiracy. It would also be a conspiracy to defraud if one of the objects was to obstruct, interfere, impair, impede or defeat the legitimate functioning of the government through fraudulent or dishonest means.

Authority: 2 Hon. Leonard B. Sand, *et al.*, *Modern Federal Jury Instructions-Criminal*, Instruction 19-12 (2018) (modified to eliminate last clause).

INSTRUCTION NO. 15

Count 1: Essential Elements of Conspiracy to Defraud the United States

For the first type of conspiracy charged in Count One, the Defendant can be found guilty of this crime only if all the following elements are proved beyond a reasonable doubt:

- (1) First, between approximately 2006 and 2017, an agreement existed between two or more people to defraud the United States. The agreement does not have to be a formal agreement or plan, in which everyone involved sat down together and worked out the details. On the other hand, merely because people get together and talk about common interests, or do similar things, does not necessarily show that an agreement exists. It is enough that the government proves beyond a reasonable doubt that there was a common understanding among those who were involved to commit the crime. So, the first thing that must be shown is the existence of an agreement.
- (2) Second, the defendant intentionally joined in that agreement. It is not necessary to find that he agreed to all the details of the crime, or that he knew the identity of all the other people the government has claimed were participating in the agreement. A person may become a member of a conspiracy even if that person agrees to play only a minor part, as long as that person understands the unlawful nature of the plan and voluntarily and intentionally joins in it with the intent to advance or further the unlawful object of the conspiracy. But mere presence at the scene of the agreement or of the crime, or merely being with the other participants, does not show that the defendant knowingly joined in the agreement. Also, unknowingly acting in a way that helps the participants, or merely knowing about the agreement itself, without more, does not make the defendant part of the conspiracy. So the second thing that must be shown is that Mr. Manafort was part of the conspiracy.

- (3) Third, one of the people involved in the conspiracy did something for the purpose of carrying out the conspiracy. This something is referred to as an overt act. An “overt act” is any transaction or event, even one which may be entirely innocent when viewed alone, that a conspirator commits to accomplish some object of the conspiracy. In order to sustain its burden of proof on this element under Count One of the indictment, the government must prove beyond a reasonable doubt that one of the members of the alleged conspiracy or agreement knowingly performed at least one overt act, that this overt act was performed during the existence or life of the conspiracy between 2006 and 2017, and was done to somehow further the goal of the conspiracy or agreement. The charged overt acts are: (a) the use of a series of overseas and domestic corporate entities, (b) wiring money from offshore accounts controlled or beneficially owned by Mr. Manafort into the United States to pay for goods, services and real estate without paying taxes on that income, (c) a multi-part international lobbying scheme on behalf of foreign principals that involved the retention of lobbying firms, law firms, and public relations firms to perform work in the United States, (d) the retention of a group of former European politicians who lobbied in the United States, (e) the concealment of these activities, and (f) the concealment of overseas accounts used in the charged schemes. Although you must unanimously agree that the same overt act was committed, the government is not required to prove more than one of the overt acts charged.

A conspiracy can be proved indirectly, by facts and circumstances that lead to a conclusion that a conspiracy existed. The government must prove that such facts and circumstances existed and that they lead to the conclusion that a conspiracy existed.

In determining whether a conspiracy between two or more persons existed and whether Mr. Manafort was one of its members, you may consider the acts and the statements of any other member of the conspiracy as evidence against Mr. Manafort whether done in or out of his presence while the conspiracy existed. When persons enter into an agreement to commit a crime, they become agents for each other so that everything which is said or done by one of them in furtherance of that purpose is deemed to be the statement of all who have joined in that conspiracy and is evidence against all of the conspirators. However, statements of any conspirator which are made before its existence or after its termination may be considered as evidence only against the person making such statements.

In summary, a conspiracy is a kind of partnership in crime. For any defendant to be convicted of the crime of conspiracy, the government must prove three things beyond a reasonable doubt: first, that there was an agreement to defraud the United States; second, that the defendant intentionally joined in that agreement; and third, that one of the people involved in the conspiracy did one of the overt acts charged.

Authority: Redbook, Instruction 7.102 (basic conspiracy instruction); *United States v. Dean*, 55 F.3d 640, 647 (D.C. Cir. 1995) (elements); *United States v. Treadwell*, 760 F.2d 327, 333 (D.C. Cir. 1985) (same); 1 Sand, *et al.*, *Modern Federal Jury Instructions-Criminal*, Chapter 19 (2018). Alternatively, in lieu of a summary of the overt acts, the Court could read the alleged overt acts for Count 1, which are contained within paragraphs 8–11, 14–18, 20–31, 35–36, and 45.

INSTRUCTION NO. 16

Count 1: Overview of Conspiracy to Commit an Offense Against the United States

As to the second type of conspiracy charged in Count One, the defendant is charged with conspiring with others to commit four felony offenses: (1) the offense of acting, and causing and aiding and abetting others to act, as unregistered agents of a foreign principal, in violation of the Foreign Agents Registration Act (FARA); (2) the offense of making false and misleading statements of material fact, or misleading omissions, in documents filed with the Attorney General under the provisions of FARA; (3) the offense of making materially false statements in two letters to the Department of Justice; and (4) the offense of failing to file required reports of foreign bank accounts (FBAR) with the Department of the Treasury.

The crime of conspiracy to violate federal law is an independent offense. It is against the law to agree with someone to commit the crimes of acting as a foreign agent, making false statements under the FARA statute, to make false statements to the Department of Justice, and to fail to file an FBAR. The charge of conspiracy to commit these four violations of federal law is thus a separate charge from the actual violations of any of these specific federal laws, which Mr. Manafort is separately charged with violating in Counts Three, Four, and Five of the indictment.

The law refers to the actual violations of the specific federal laws as “substantive crimes.” Indeed, you may find the defendant guilty of the crime of conspiracy to commit an offense against the United States even though the substantive crime that was the object of the conspiracy was not actually committed. The government is not required to prove that the objective was achieved.

Authority: Superseding Indictment; Redbook, Instruction 7.102.

INSTRUCTION NO. 17

Count 1: Essential Elements of Conspiracy to Commit an Offense Against the United States

For the second type of conspiracy charged in Count One, I will first describe the elements of the second type of conspiracy charged in Count One, then describe the crimes that the government alleges were the objects of the conspiracy.

To find the defendant guilty of the second conspiracy charged in Count One, you must be convinced that the government has proved beyond a reasonable doubt each of the following elements:

- (1) First, that between 2006 and 2017, an agreement existed between two or more people in some way agreed to try to commit one or more of the specific offenses described in the indictment. As I mentioned before, a conspiracy does not have to be a formal agreement or plan.
- (2) Second, the defendant intentionally joined in that agreement. Again, it is not necessary to find that the defendant agreed to all the details of the crime, or that he knew the identity of all the other people the government has claimed were participating in the agreement.
- (3) Third, one of the people involved in the conspiracy did something for the purpose of carrying out the conspiracy. For the second conspiracy charged in Count One, the charged overt acts include (a) the use of a series of overseas and domestic corporate entities, (b) wiring money from offshore accounts controlled beneficially owned or by Manafort into the United States to pay for goods, services and real estate without paying taxes on that income, (c) a multi-part international lobbying scheme on behalf of foreign principals that involved the retention of lobbying firms, law firms, and public relations firms to perform work in the United States, (d) the retention of a group of former European politicians who lobbied in the United States, (e) the concealment of these activities, and (f) the concealment

of overseas accounts used in the charged schemes. The government need not prove that all of these overt acts were taken, but in order to find the defendant guilty, you must all agree on at least one overt act that was done.

A conspiracy can be proved indirectly, by facts and circumstances that lead to a conclusion that a conspiracy existed. The government must prove that such facts and circumstances existed and that they lead to the conclusion that a conspiracy existed.

In determining whether a conspiracy between two or more persons existed and whether Mr. Manafort was one of its members, you may consider the acts and the statements of any other member of the conspiracy as evidence against Mr. Manafort whether done in or out of his presence while the conspiracy existed. When persons enter into an agreement to commit a crime, they become agents for each other so that everything which is said or done by one of them in furtherance of that purpose is deemed to be the statement of all who have joined in that conspiracy and is evidence against all of the conspirators. However, statements of any conspirator which are made before its existence or after its termination may be considered as evidence only against the person making such statements.

Elements of the Conspiracy's Objects

In Count One, the government has alleged the defendant agreed to violate multiple federal crimes. I will now provide you with some information about those specific laws.

In Count One, the government has alleged that one object of the conspiracy was to act as an unregistered agent of a foreign principal. For Count One, the government does not have to prove that the defendant committed this crime; only that this was an object of the conspiracy. In considering whether this was an object of the conspiracy, the following legal principles and definitions apply. A person willfully violates the FARA requirements if:

- (1) The defendant acted in the United States as an agent of a foreign principal;

- (2) The defendant acted without registering with the Attorney General; and
- (3) The defendant acted willfully.

I will provide further instruction about the relevant FARA laws in a moment.

The government has alleged that another object of the conspiracy charged in Count One was to make false and misleading statements in connection with a FARA Filing. For Count One, the government does not have to prove that the defendant committed this crime; only that this was an object of the conspiracy. In considering whether this was an object of the conspiracy, the following legal principles and definitions apply. The elements of the crime of making false and misleading FARA statements are:

- (1) The defendant made a false statement of a material fact, or omitted a material fact necessary to make the statement not misleading;
- (2) The defendant made such a statement in a document filed with or furnished to the Attorney General under FARA; and
- (3) The defendant acted willfully.

I will provide further instruction about the relevant FARA laws in a moment.

The government has alleged that another object of the conspiracy charged in Count One was to make false statements in a matter within the jurisdiction of the executive branch. For Count One, the government does not have to prove that the defendant committed this crime; only that this was an object of the conspiracy. In considering whether this was an object of the conspiracy, the following legal principles and definitions apply. The elements of the crime of making false statements are:

- (1) The defendant made a statement or representation;
- (2) The statement was false, fictitious, or fraudulent;

- (3) The statement was material;
- (4) The defendant acted knowingly and willfully; and
- (5) That statement or representation was made in any matter within the jurisdiction of the executive branch of the United States government.

I will provide further instruction about this law in a moment.

The government has alleged that the final object of the conspiracy was to willfully fail to file reports of bank and financial accounts, also known as an “FBAR” requirement. It is a federal crime to willfully fail to report one’s foreign bank and financial accounts if the aggregate value of all such accounts exceeds \$10,000 during a single year. The government does not have to prove that the defendant committed this crime; only that this was an object of the conspiracy. In considering whether this was an object of the conspiracy, the following legal principles and definitions apply. A person willfully violates the FBAR requirements if:

- (1) The person was a U.S. person, that is, a U.S. citizen or resident alien, or an entity organized under Federal or state law.
- (2) The person had a financial interest in, and signature authority over, a bank, securities, or other financial account in a foreign country.
- (3) The aggregate value of all such accounts exceeded \$10,000 at any time during the calendar year.
- (4) The person failed to report such account on FinCEN Form 114, a Report of Foreign Bank and Financial Accounts, by the annual deadline date; and
- (5) The person willfully failed to report the account.

A person acts “willfully” if he acts with a bad purpose to disobey or disregard the law. To act “willfully,” a person must have knowledge that his conduct was unlawful, but he need not know the specific provision that the conduct violates.

Unanimity—Special—Conspiracy

In Count One, the defendant has been charged with one count of conspiracy against the United States. You have heard evidence of more than one act or incident related to this count. Specifically, you have heard evidence regarding an alleged conspiracy to defraud the government, to violate FARA, to make false statements under the FARA statute, to make false statements to the government, and to fail to disclose foreign accounts.

You may find the defendant guilty on this count if the government proves beyond a reasonable doubt that he participated in a conspiracy with any one of these objects. However, in order to return a guilty verdict on this count, you must all agree about which object the defendant conspired to commit. That is to say, you must all agree either that the defendant conspired to defraud the government, or you must all agree that he conspired to violate FARA, or you must all agree that he conspired to make false statements under the FARA statute, or you must all agree that he conspired to make false statements to the government, or you must all agree that he conspired to fail to disclose foreign accounts.

You may also all agree that the defendant agreed to commit more than one of the crimes, in which case you should indicate as such in verdict form I will discuss with you.

Authority: Redbook, Instruction No. 7.102, 2.406 (unanimity); *United States v. Hussain*, No. 1:11-CR-63, 2012 WL 10688321 (D.D.C. Jan. 18, 2012) (modifying Redbook general conspiracy instruction); 31 U.S.C. §§ 5314 and 5322 (Failure To File Reports of Foreign Bank and Financial Accounts). Alternatively, in lieu of a summary of the overt acts, the Court could read the alleged overt acts for Count 1, which are contained within paragraphs 8–11, 14–18, 20–31, 35–36, and 45.

INSTRUCTION NO. 18

Count 2: Nature of the Offense

Count Two of the superseding indictment charges that from in or around and between 2006 and 2016, within the District of Columbia and elsewhere, the defendant did knowingly and intentionally conspire to (a) transport, transmit, and transfer monetary instruments and funds from places outside the United States to and through places in the United States and from places in the United States to and through places outside the United States, with the intent to promote the carrying on of a felony violation of FARA; (b) to conduct financial transactions knowing that the property represented or involved proceeds of a felony violation of FARA, and knowing that such financial transactions were designed to disguise the nature, location, source, ownership, or control of the proceeds of a felony violation of the Foreign Agents Registration Act; and (c) to conduct financial transactions knowing that the property represented or involved proceeds of a felony violation of FARA, and knowing that such financial transactions were entered into with the intent to evade federal income taxes.

Count Two of the indictment charges a conspiracy to commit three different types of money laundering, each of which is a crime.

First, the indictment alleges that the defendant conspired to conduct certain financial transactions intended to promote a felony violation of the Foreign Agents Registration Act. This crime is sometimes called “promotional” money laundering.

Second, the indictment alleges that the defendant conspired to conduct certain financial transactions to conceal the proceeds of a felony violation of the Foreign Agents Registration Act. This crime is sometimes call “concealment” money laundering.

Third, the indictment alleges that the defendant conspired to conduct certain financial transactions to evade the taxation of the proceeds of a felony violation of the Foreign Agents Registration Act. This crime is sometimes called “tax-evasion” money laundering.

I have referred to a felony violation of the Foreign Agents Registration Act. Count Three, which I will instruct you on in a moment, allege a felony violation of the Foreign Agents Registration Act.

Authority: Indictment; 18 U.S.C. § 1956(h).

INSTRUCTION NO. 19

Count 2: Essential Elements of the Offenses Charged

The elements of conspiracy to commit money laundering, each of which the government must prove beyond a reasonable doubt, are that:

- (1) Two or more people agreed to try to accomplish a common and unlawful plan to commit money laundering in violation of 18 U.S.C. § 1956.
- (2) The defendant voluntarily joined the conspiracy knowing its unlawful purpose and with an intent to further that purpose.

Unlike for the conspiracy charged in Count One, the government need not prove an “overt act” to prove the money-laundering conspiracy charged in Count Two.

A conspiracy can be proved indirectly, by facts and circumstances that lead to a conclusion that a conspiracy existed. The government must prove that such facts and circumstances existed and that they lead to the conclusion that a conspiracy existed.

In determining whether a conspiracy between two or more persons existed and whether Mr. Manafort was one of its members, you may consider the acts and the statements of any other member of the conspiracy as evidence against Mr. Manafort whether done in or out of his presence while the conspiracy existed. When persons enter into an agreement to commit a crime, they become agents for each other so that everything which is said or done by one of them in furtherance of that purpose is deemed to be the statement of all who have joined in that conspiracy and is evidence against all of the conspirators. However, statements of any conspirator which are made before its existence or after its termination may be considered as evidence only against the person making such statements.

Elements of the Conspiracy's Objects

The money laundering statute, 18 U.S.C. § 1956, can be violated in the three ways mentioned above. But the evidence need not establish that these violations actually occurred to prove a conspiracy, so long as the unlawful agreement and intent set forth above are shown.

The first type of violation, promotional money laundering, has the following elements:

- (1) First, a person knowingly transmitted or transferred monetary instruments or funds to a place in the United States from or through a place outside the United States.
- (2) Second, a person acted with the intent to promote the carrying on of a specified unlawful activity—that is, he conducted or attempted to conduct the financial transaction for the purpose of making easier or helping to bring about the specified unlawful activity.

The phrase “specified unlawful activity” is defined in federal law, and it includes a felony violation of the Foreign Agents Registration Act (FARA).

The second type of violation, concealment money laundering, has the following elements:

- (1) First, a person conducted or attempted to conduct a financial transaction.
- (2) Second, a person knew the property involved in the transaction represented the proceeds of some form of unlawful activity.
- (3) Third, the property in fact represented the proceeds of a specified unlawful activity, here, a felony violation of the Foreign Agents Registration Act.
- (4) Fourth, a person knew that the financial transaction was designed in whole or part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity.

The term “proceeds” means any property derived from or obtained or retained, directly or indirectly, through some form of unlawful activity, including the gross receipts of such activity. Proceeds can be any kind of property, not just money.

The third type of violation, tax evasion money laundering, has the following elements:

- (1) First, the person conducted or attempted to conduct a financial transaction.
- (2) Second, the person knew the property involved in the transaction represented the proceeds of some form of unlawful activity.
- (3) Third, the property in fact represented the proceeds of specified unlawful activity, here, a felony violation of the Foreign Agents Registration Act.
- (4) Fourth, the person, acted with the intent to engage in conduct constituting a violation of 26 U.S.C. § 7201 (tax evasion) or 26 U.S.C. § 7206 (tax perjury).

For purposes of the fourth element, an intent to evade taxes need not be the defendant's sole purpose in conducting the transaction.

Unanimity—Special—Money Laundering

In Count Two, the defendant has been charged with one count of conspiracy to launder money. You have heard evidence of more than one act or incident related to this count. Specifically, you have heard evidence regarding the defendant's alleged conspiracy to engage in certain financial transactions to promote a felony violation of the Foreign Agents Registration Act; his alleged conspiracy to engage in certain financial transactions to conceal the proceeds of a felony violation of the Foreign Agents Registration Act; and his alleged conspiracy to engage in certain financial transactions to evade paying income taxes on the proceeds of a felony violation of the Foreign Agents Registration Act.

You may find the defendant guilty on this count if the government proves beyond a reasonable doubt that the defendant committed any one of these incidents. However, in order to return a guilty verdict on this count, you must all agree about which incident the defendant committed. That is to say, in order to return a guilty verdict on this count, either you must all agree that the defendant conspired to engage in certain financial transactions to promote a felony

violation of the Foreign Agents Registration Act; or you must all agree that he conspired to engage in certain financial transactions to conceal the proceeds of a felony violation of the Foreign Agents Registration Act; or you must all agree that he conspired to engage in certain financial transactions to evade income taxes on the proceeds of a felony violation of the Foreign Agents Registration.

You may also all agree that the defendant agreed to commit more than one of the crimes, in which case you should indicate as such in verdict form I will discuss with you.

Authority: Eleventh Circuit Pattern Jury Instructions (Criminal Cases) O74.5 (2016); Ninth Circuit Model Criminal Jury Instruction 8.148; 3 Sand, *et al.*, *Modern Federal Jury Instructions-Criminal* 50A-2, 50A-6, 50A-12; *Whitfield v. United States*, 543 U.S. 209 (2005) (no overt act needed); Eleventh Cir. Pattern Instr. O74.2 (elements and meaning of “concealment”); Eleventh Cir. Pattern Instr. O74.3 (elements and meaning of “promote”); *United States v. Zanghi*, 189 F.3d 71, 77-78 & n.5 (1st Cir. 1999) (intent to evade taxes need not be the sole purpose); Red Book, Instruction 2.406 (unanimity); 18 U.S.C. § 1956(c)(9) (definition of “proceeds”).

INSTRUCTION NO. 20

Count 3: Nature of the Offense

Count Three of the superseding indictment charges that between 2008 and 2014, the defendant knowingly and willfully acted as an agent of a foreign principal, and caused and aided and abetted Companies A, B, and C, and others, including former senior foreign politicians, to act as agents of a foreign principal, to wit, the Government of Ukraine, the Party of Regions, and Yanukovich, without registering with the Attorney General as required by law.

Authority: Superseding Indictment. The names of Companies A, B, and C should be inserted at the time the instructions should be given.

INSTRUCTION NO. 21

Count 3: Essential Elements of the Offense Charged

The elements of the crime of acting as an unregistered agent of a foreign principal, each of which the government must prove beyond a reasonable doubt, are that:

- (1) First, the defendant acted in the United States as an agent of a foreign principal.
- (2) Second, the defendant acted without registering with the Attorney General.
- (3) Third, the defendant acted willfully.

The term “foreign principal” includes the government of a foreign country, a foreign political party, and entities—such as corporations, partnerships, or organizations—that are organized under the laws of or have their principal place of business in a foreign country.

A defendant “acts as an agent of a foreign principal” in the United States if, either “directly or through any other person,” he (i) engages in political activities for or in the interests of such foreign principal, which includes attempts to influence federal officials or the public on foreign or domestic policy; (ii) acts as public relations counsel, publicity agent, information-service employee or political consultant for or in the interests of such foreign principal; (iii) solicits, collects, disburses, or dispenses contributions, loans, money, or other things of value for or in the interest of such foreign principal; or (iv) represents the interests of such foreign principal before any federal agency or official.

The term “agent” encompasses a person who serves as a representative, employee, or servant or in any other capacity at the order, request, or under the direction or control of a foreign principal, or person any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign principal.

A defendant acts “willfully” if he acts with a bad purpose to disobey or disregard the law. To act “willfully,” a defendant must have knowledge that his conduct was unlawful, but he need not know the specific provision that the conduct violates.

Authority: 22 U.S.C. §§ 611, 612, 618 (FARA definitions); *Bryan v. United States*, 524 U.S. 184 (1998) (definition of willfulness).

INSTRUCTION NO. 22

Count 4: Nature of the Offense

Count Four of the superseding indictment charges that on November 23, 2016, and February 10, 2017, within the District of Columbia and elsewhere, the defendant, knowingly and willfully caused to be made a false statement of a material fact, and omitted a material fact necessary to make the statements therein not misleading, in a document filed with and furnished to the Attorney General under the provisions of FARA.

Authority: Superseding Indictment.

INSTRUCTION NO. 23

Count 4: Essential Elements of the Offense Charged

The elements of the crime of making false and misleading FARA statements, each of which the government must prove beyond a reasonable doubt, are that:

- (1) First, the defendant made a false statement of a material fact, or omitted a material fact necessary to the make the statement not misleading.
- (2) Second, the defendant made such a statement in a document filed with or furnished to the Attorney General under FARA; and
- (3) Third, the defendant acted willfully.

For this offense, a statement is “material” if it has a natural tendency to influence or is capable of influencing the decision of the decisionmaker to which it was addressed.

A defendant acts “willfully” if he acts with a bad purpose to disobey or disregard the law. To act “willfully,” a defendant must have knowledge that his conduct was unlawful, but he need not know the specific provision that the conduct violates.

Unanimity—Special—FARA False Statements

In Count Four, the defendant has been charged with one count of making false and misleading statements. You have heard evidence of more than one statements related to this count. Specifically, you have heard about multiple statements made in two submissions contained within documents filed with the Attorney General under the provisions of FARA.

You may find the defendant guilty on this count if the government proves beyond a reasonable doubt that the defendant willfully made any of these false or misleading statements. However, in order to return a guilty verdict on this count, you must all agree about which statement was willfully false or misleading.

Authority: 22 U.S.C. §§ 612 & 618(a)(2); Redbook, Instruction 2.406 (unanimity).

INSTRUCTION NO. 24

Count 5: Nature of the Offense

Count Five of the superseding indictment charges that on November 23, 2016, and February 10, 2017, within the District of Columbia and elsewhere, the defendant, knowingly and willfully did cause another: to falsify, conceal, and cover up by a scheme and device a material fact; to make a materially false, fictitious, and fraudulent statement and representation; and to make and use a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement.

Authority: Superseding Indictment.

INSTRUCTION NO. 25

Count 5: Essential Elements of the Offense Charged

The federal statute covering false statements to the government can be violated in two ways relevant to the offense charged in Count Five.

The elements of the first version of the offense, each of which the government must prove beyond a reasonable doubt, are that:

- (1) The defendant made a statement or representation;
- (2) The statement was false, fictitious, or fraudulent;
- (3) The statement was material;
- (4) The defendant acted knowingly and willfully; and
- (5) That statement or representation was made in any matter within the jurisdiction of the executive branch of the United States government.

The elements of the third version of the offense, each of which the government must prove beyond a reasonable doubt, are that:

- (1) The defendant used a writing or document;
- (2) The writing or document contained a false, fictitious, or fraudulent statement or representation;
- (3) The statement or representation was material;
- (4) The defendant the defendant knew that the writing contained a false, fictitious or fraudulent statement or entry, and knowingly and willfully used said writing or document; and
- (5) The document or writing was used in a matter within the jurisdiction of the executive branch of the United States government.

For this offense, a statement is “material” if it has a natural tendency to influence or is capable of influencing the decision of the decisionmaker to which it was addressed.

A defendant acts “knowingly and willfully” if he acts knowing that the statement was false, fictitious, or fraudulent and knowing that his conduct was unlawful, even if he does not know the specific provision that the conduct violates.

Unanimity—Special—False Statements

In Count Five, the defendant has been charged with one count of making false statements. You have heard evidence of more than one statement related to this count. Specifically, you have heard about statements in two submissions made to the Department of Justice.

You may find the defendant guilty on this count if the government proves beyond a reasonable doubt that the defendant willfully made any of these false, fictitious, or fraudulent statements. However, in order to return a guilty verdict on this count, you must all agree about which statement was willfully false or misleading.

Authority: 18 U.S.C. § 1001(a)(2) and (a)(3); 2 Hon. Leonard B. Sand, et al., *Modern Federal Jury Instructions-Criminal*, Instructions 36-9, 36-15 (2018); Redbook, Instruction 2.406 (unanimity).

INSTRUCTION NO. 26

Count 6: Nature of the Offense

Count Six of the superseding indictment charges that between February 23, 2018, and April 2018, the defendant knowingly and intentionally attempted to corruptly persuade another person with intent to influence, delay, and prevent the testimony of any person in an official proceeding.

Authorities: Superseding Indictment.

INSTRUCTION NO. 27

Count 6: Essential Elements of the Offense Charged

The elements of the crime of witness tampering, each of which the government must prove beyond a reasonable doubt, are that:

- (1) First, on or about the date charged, the defendant corruptly persuaded another person, or attempted to do so.
- (2) Second, the defendant acted knowingly.
- (3) Third, the defendant acted with the intent to influence, delay, or prevent the testimony of that person in an official proceeding.

The word “knowingly” means that the act was done voluntarily and intentionally with the knowledge that it was wrong, and not because of mistake or accident. The word “corruptly” means that the act was done dishonestly and with the intent to obtain an improper advantage. To engage in corrupt persuasion “knowingly,” the defendant must be conscious that he is engaging in wrongdoing.

For a defendant to have “attempted” to commit this offense, the defendant must intend to commit the crime of witness tampering, and also must do an act constituting a substantial step toward the commission of that crime. A “substantial step” is an act that goes beyond mere preparation and that is reasonably adapted to accomplishing the crime.

An “official proceeding” is a proceeding before a federal court, a federal judge, the United States Congress or a federal agency. The “official proceeding” need not be pending at the time of the defendant acts, but that proceeding must at least be one that is foreseen by the defendant.

Authority: 18 U.S.C. § 1512(b)(1); *Arthur Andersen LLP v. United States*, 544 U.S. 696, 704–08 (2005); Redbook, Instruction 7.101 (attempt requires “substantial step”).

INSTRUCTION NO. 28

Count 7: Nature of the Offense

Count Six of the superseding indictment charges that between February 23, 2018, and April 2018, both dates being approximate and inclusive, within the District of Columbia and elsewhere, the defendant knowingly and intentionally conspired to corruptly persuade another person, to wit: Persons D1 and D2, with intent to influence, delay, and prevent the testimony of any person in an official proceeding.

Authority: Superseding Indictment. The names of Persons D1 and D2 should be inserted at the time the instructions should be given.

INSTRUCTION NO. 29

Count 7: Essential Elements of the Offense Charged

As explained above, a conspiracy is a kind of criminal partnership—a combination or agreement of two or more persons to join together to accomplish some unlawful purpose. The government is not required to prove that the objective was achieved.

The elements of conspiracy to tamper with witnesses, each of which the government must prove beyond a reasonable doubt, are that:

- (1) First, an agreement existed between two or more persons to influence, through corrupt persuasion, the testimony of another person.
- (2) Second, the defendant knew the agreement.
- (3) Third, the defendant intentionally joined the conspiracy intending to further its unlawful end.

A conspiracy can be proved indirectly, by facts and circumstances that lead to a conclusion that a conspiracy existed. The government must prove that such facts and circumstances existed and that they lead to the conclusion that a conspiracy existed.

In determining whether a conspiracy between two or more persons existed and whether Mr. Manafort was one of its members, you may consider the acts and the statements of any other member of the conspiracy as evidence against Mr. Manafort whether done in or out of his presence while the conspiracy existed. When persons enter into an agreement to commit a crime, they become agents for each other so that everything which is said or done by one of them in furtherance of that purpose is deemed to be the statement of all who have joined in that conspiracy and is evidence against all of the conspirators. However, statements of any conspirator which are made before its existence or after its termination may be considered as evidence only against the person making such statements.

As was true for the conspiracy charged in Count Two, and unlike for the conspiracy charged in Count One, the government need not prove an “overt act” for the conspiracy charged here in Count Seven.

Authority: 18 U.S.C. § 1512(k); *Whitfield v. United States*, 543 U.S. 209 (2005); *United States v. Edlind*, 887 F.3d 166, 176 n.4 (4th Cir. 2018) (no overt act necessary).

INSTRUCTION NO. 30

Direct and Circumstantial Evidence

There are two types of evidence from which you may determine what the facts are in this case—direct evidence and circumstantial evidence. When a witness, such as an eyewitness, asserts actual knowledge of a fact, that witness’s testimony is direct evidence. On the other hand, evidence of facts and circumstances from which reasonable inferences may be drawn is circumstantial evidence.

Let me give you an example. Assume a person looked out a window and saw that snow was falling. If he later testified in court about what he had seen, his testimony would be direct evidence that snow was falling at the time he saw it happen. Assume, however, that he looked out a window and saw no snow on the ground, and then went to sleep and saw snow on the ground after he woke up. His testimony about what he had seen would be circumstantial evidence that it had snowed while he was asleep.

The law says that both direct and circumstantial evidence are acceptable as a means of proving a fact. The law does not favor one form of evidence over another. It is for you to decide how much weight to give to any particular evidence, whether it is direct or circumstantial. You are permitted to give equal weight to both. Circumstantial evidence does not require a greater degree of certainty than direct evidence. In reaching a verdict in this case, you should consider all of the evidence presented, both direct and circumstantial.

Authority: Redbook, Instruction No. 2.109.

INSTRUCTION NO. 31

Inadmissible and Stricken Evidence

The lawyers in this case sometimes objected when the other side asked a question, made an argument, or offered evidence that the objecting lawyer believed was not proper. You must not hold such objections against the lawyer who made them or the party s/he represents. It is the lawyers' responsibility to object to evidence that they believe is not admissible.

If, during the course of the trial, I sustained an objection to a lawyer's question, you should ignore the question, and you must not speculate as to what the answer would have been. If, after a witness answered a question, I ruled that the answer should be stricken, you should ignore both the question and the answer and they should play no part in your deliberations. Likewise, exhibits as to which I have sustained an objection or that I ordered stricken are not evidence, and you must not consider them in your deliberations.

Authority: Redbook, Instruction No. 2.112.

INSTRUCTION NO. 32

Law Enforcement Techniques

During the trial you have heard testimony of witnesses and argument by counsel that the government did not utilize specific investigative techniques. You may consider these facts in deciding whether the government has met its burden of proof, because as I told you, you should look to all of the evidence or lack of evidence in deciding whether the defendant is guilty. However, you are also instructed that there is no legal requirement use any specific investigative techniques to prove its case. Law enforcement techniques are not your concern.

Further, I am sure that at least one of you has seen the popular television shows like “C.S.I.” or “Law & Order.” The TV standards, and the capabilities of law enforcement as portrayed on TV and in the movies, do not apply here to this trial. Witness testimony is sufficient to establish the charges in this case. Specific investigative techniques, such as videotaping an arrest or testing for DNA, are not required to be presented in order for you to find the defendant guilty of the charges in this case. Please dismiss from your deliberations in consideration of the appropriate verdicts in this case investigative techniques which you may have seen on T.V. or in movies, as well as anything else about which there was no evidence.

Your concern, as I have said, is to determine whether or not, on the evidence or lack of evidence, the defendant’s guilt has been proven beyond a reasonable doubt.

Authority: *United States v. Best*, 1:13-cr-00301-ABJ (D.D.C. May 7, 2014) (ECF No. 21).

INSTRUCTION NO. 33

Credibility of Witnesses

In determining whether the government has proved the charges against the defendant beyond a reasonable doubt, you must consider the testimony of all the witnesses who have testified.

You are the sole judges of the credibility of the witnesses. You alone determine whether to believe any witness and the extent to which a witness should be believed. Judging a witness's credibility means evaluating whether the witness has testified truthfully and also whether the witness accurately observed, recalled, and described the matters about which the witness testified.

You may consider anything that in your judgment affects the credibility of any witness. For example, you may consider the demeanor and the behavior of the witness on the witness stand; the witness's manner of testifying; whether the witness impresses you as a truthful person; whether the witness impresses you as having an accurate memory and recollection; whether the witness has any motive for not telling the truth; whether the witness had a full opportunity to observe the matters about which he or she has testified; whether the witness has any interest in the outcome of this case, or friendship or hostility toward other people concerned with this case.

In evaluating the accuracy of a witness's memory, you may consider the circumstances surrounding the event, including any circumstances that would impair or improve the witness's ability to remember the event, the time that elapsed between the event and any later recollections of the event, and the circumstances under which the witness was asked to recall details of the event.

You may consider the reasonableness or unreasonableness, the probability or improbability, of the testimony of a witness in determining whether to accept it as true and accurate. You may consider whether the witness has been contradicted or supported by other evidence that you credit.

If you believe that any witness has shown him or herself to be biased or prejudiced, for or against either side in this trial, you may consider and determine whether such bias or prejudice has colored the testimony of the witness so as to affect the desire and capability of that witness to tell the truth.

You should give the testimony of each witness such weight as in your judgment it is fairly entitled to receive.

Authority: Redbook, Instruction No. 2.200.

INSTRUCTION NO. 34

Accomplice's and Cooperator's Testimony

You have heard testimony from [witness name(s)] was actually involved in some of the criminal conduct charged in the Indictment. [Witness name(s)] has himself pleaded guilty to charges arising out of the same facts as this case. You are to draw no inferences or conclusions of any kind about the guilt of any defendant on trial from the fact that a prosecution witness pleaded guilty to similar or related charges. Each witness's decision to plead guilty was personal to his own guilt, and that decision may not be used as evidence against any defendant on trial.

[Witness name(s)] has, however, also testified about conduct allegedly engaged in by the defendant here on trial.

The government is permitted to use a witness who testifies that he participated in the offenses charged against the defendant, although the testimony of such a witness should be considered with caution. A witness who has entered into a plea agreement is under the same obligation to tell the truth as is any other witness; the plea agreement does not protect him against a prosecution for perjury or false statement, should he lie under oath. You will have to assess [witness name(s)] and decide whether or not you credit the testimony given. I have already given you general instructions about factors you should consider in evaluating the testimony of any witness.

Because people who themselves take part in criminal activity often have the knowledge required to reveal criminal behavior by others, the law allows the use of accomplice testimony. Indeed, it is the law in federal courts that the testimony of a single accomplice may be enough, by itself, to support a conviction, if the jury finds that the testimony establishes guilt beyond a reasonable doubt.

Because of the very nature of accomplice testimony, however, it must be scrutinized with great care and viewed with particular caution when you decide how much of that testimony you believe. You should, for example, ask yourselves whether an accomplice witness would benefit more by lying or by telling the truth.

In this case, you have heard that [witness name(s)] entered into a written plea agreement with the government that provides, in part, for him to give testimony in this case. The government agreed to dismiss certain charges filed and agreed not to pursue other charges in exchange for the witness's agreement to plead guilty and testify at trial. The government also agreed to bring any substantial assistance provided by [witness name(s)] to the attention of this court for consideration at sentencing. You have further heard that [witness name(s)] engaged in unlawful conduct while participating in a proffer session with the government, which included making false statements to the government.

Ladies and gentlemen, the government is permitted to enter into such agreements with witnesses. But a witness who testifies pursuant to such an agreement does have an interest in this case different from an ordinary witness. This is why you must carefully scrutinize whether the testimony of an accomplice was made up in any way because he believed or hoped that he would receive favorable treatment by testifying falsely. For this reason, a witness's understanding of his agreement and his expectations under that agreement may be more important to your assessment of his credibility than the actual terms of the agreement.

In fact, the ultimate decision as to [witness name(s)] sentence rests with the Court. But you should ask yourselves, did [witness name(s)] believe that his interests, whether with respect to sentencing or any other benefit, would be best served by testifying truthfully or by testifying falsely? If you believe that the witness was motivated by hopes of personal gain, was the

motivation one that would cause him to lie, or was it one that would cause him to tell the truth?

Did this motivation color his testimony?

In sum, you should look at all of the evidence in deciding whether you believe an accomplice witness and what weight, if any, his testimony deserves.

Authority: Redbook, Instruction Nos. 2.202–2.203; *United States v. Wong Chi Fai*, No. 93-CR-1340 (E.D.N.Y).

INSTRUCTION NO. 35

Testimony of Immunized Witnesses (If Applicable)

You have heard evidence that a witness [insert name] has received immunity. This means that the testimony of the witness may not be used against him/her in any criminal case. You should consider whether a witness who realizes that s/he may receive a benefit by incriminating another may have a motive to lie. However, you may also consider that the witness is under the same obligation to tell the truth as is any other witness, because the grant of immunity does not protect him/her against a prosecution for perjury or false statement, should s/he lie under oath.

The testimony of a witness to whom immunity has been granted should be considered with caution. You should give the testimony as much weight as in your judgment it deserves.

Authority: Redbook, Instruction No. 2.204.

INSTRUCTION NO. 36

Law Enforcement Officer's Testimony

A law enforcement officer's testimony should be evaluated by you just as any other evidence in the case. In evaluating the officer's credibility, you should use the same guidelines that you apply to the testimony of any witness. In no event should you give either greater or lesser weight to the testimony of any witness merely because s/he is a law enforcement officer.

Authority: Redbook, Instruction No. 2.207 (modified to substitute "law enforcement officer" for "police officer" in the pattern instruction).

INSTRUCTION NO. 37

Right of Defendant Not to Testify (*If Applicable*)

Every defendant in a criminal case has an absolute right not to testify. Mr. Manafort has chosen to exercise this right. You must not hold this decision against him, and it would be improper for you to speculate as to the reason or reasons for his decision. You must not assume the defendant is guilty because he chose not to testify.

Authority: Redbook, Instruction No. 2.208.

INSTRUCTION NO. 38

Defendant as Witness (If Applicable)

A defendant has a right to become a witness in his own behalf. His testimony should not be disbelieved merely because he is the defendant. In evaluating his testimony, however, you may consider the fact that the defendant has a vital interest in the outcome of this trial. As with the testimony of any other witness, you should give the defendant's testimony as much weight as in your judgment it deserves.

Authority: Redbook, Instruction No. 2.209–2.210.

INSTRUCTION NO. 39

False or Inconsistent Statement by Defendant

You have heard evidence that the defendant made statements in explanation of his actions that may have been false or inconsistent. It is up to you to decide whether he made the statements, and whether they were, in fact, false or inconsistent. If you find he did make such statements and that they were false or inconsistent, you may consider such evidence as tending to show his feelings of guilt, which you may, in turn, consider as tending to show actual guilt. On the other hand, you may also consider that he may have given such statements for reasons unrelated to this case or consistent with his innocence.

If you find that the defendant made a false or inconsistent statement in explanation of his actions, you should give the testimony as much weight as in your judgment it deserves.

Authority: Redbook, Instruction No. 2.210.

INSTRUCTION NO. 40

Character of Defendant (*If Applicable*)

The defendant has introduced testimony that he has a good reputation in the community. Such evidence may indicate to you that it is unlikely that the defendant would commit the crime charged or it may not. You may consider this evidence along with other evidence in the case including evidence that contradicts the defendant's character evidence and give it as much weight as you think it deserves.

Notwithstanding the evidence of character, if, after weighing all the evidence, you are convinced beyond a reasonable doubt that the defendant is guilty of the crime charged, it is your duty to find him or her guilty. On the other hand, evidence of good character alone may create a reasonable doubt as to a defendant's guilt, although without it the other evidence would be convincing.

Authority: Redbook, Instruction No. 2.213.

INSTRUCTION NO. 41

Specialized Opinion Testimony (If Applicable)

In this case, [you will hear] [you heard] the testimony of [name of witness] who [will express] [expressed] opinions concerning [certain subjects; specify the subject(s), if possible]. If scientific, technical, or other specialized knowledge might assist the jury in understanding the evidence or in determining a fact in issue, a witness who possesses knowledge, skill, experience, training, or education may testify and state an opinion concerning such matters. You are not bound to accept this witness's opinion. If you find that the opinion is not based on sufficient education or experience, that the reasons supporting the opinion are not sound, or that the opinion is outweighed by other evidence, you may completely or partially disregard the opinion. You should consider this evidence with all the other evidence in the case and give it as much weight as you think it fairly deserves.

Authority: Redbook, Instruction No. 2.215.

INSTRUCTION NO. 42

Evaluation of Prior Inconsistent Statement of a Witness (If Applicable)

The law treats prior inconsistent statements differently depending on the nature of the statements and the circumstances in which they were made. I will now explain how you should evaluate those statements.

PART A (for use when prior statements not made under oath are introduced):

You have heard evidence that [name of witness] made a statement on an earlier occasion and that this statement may be inconsistent with his/her testimony here at trial. It is for you to decide whether the witness made such a statement and whether in fact it was inconsistent with the witness's testimony here. If you find such an inconsistency, you may consider the earlier statement in judging the credibility of the witness, but you may not consider it as evidence that what was said in the earlier statement was true.

PART B (for use when prior statements made under oath are introduced):

You [also] have heard evidence that [name of witness] made an earlier statement under oath, subject to the penalty of perjury at [a prior proceeding] [the grand jury] [a deposition] and that this statement may be inconsistent with [his] [her] testimony here at trial. If you find that the earlier statement is inconsistent with the witness's testimony here in court, you may consider this inconsistency in judging the credibility of the witness. You also may consider this earlier statement as evidence that what was said in the earlier statement was true.

PART C (for use when prior identification statements are used to impeach a witness):

You [also] have heard evidence that [name of witness] [made an identification] [provided a description] on an earlier occasion, and that his/her testimony here at trial may be inconsistent with that [identification] [description]. It is for you to decide whether s/he [made such an identification] [provided such a description] and whether his/her testimony here was, in fact,

inconsistent with it. If you find such an inconsistency, you may consider this inconsistency in judging the credibility of [name of witness]. You also may consider the earlier [identification] [description] as evidence that what was said in the prior [identification] [description] was true.

Authority: Redbook, Instruction No. 2.216.

INSTRUCTION NO. 43

Evaluation of Prior Consistent Statement of a Witness

You have heard evidence that [name of witness] [name of defendant] made a statement on an earlier occasion and that this statement may be consistent with his/her testimony here at trial. This earlier statement was brought to your attention [both] to help you in evaluating the credibility of the witness [and as evidence in this case]. If you find that the earlier statement is consistent with the witness's present testimony in court, you may consider this consistency [both] in judging the credibility of the witness here at trial [but you may not use it] [and] as proof that what was said in the earlier statement was true.

It is for you to decide whether a witness made a statement on an earlier occasion and whether it was in fact consistent with the witness's in-court testimony here.

Authority: Redbook, Instruction No. 2.217.

INSTRUCTION NO. 44

Impeachment by Proof of Conviction of a Crime—Witness (*If Applicable*)

You have heard evidence that [witness name(s)] has been convicted of a crime. You may consider this conviction only in evaluating the credibility of that witness's testimony in this case.

Authority: Redbook, Instruction No. 2.218.

INSTRUCTION NO. 45

Impeachment by Proof of Conviction of Pending Case, Probation Or Parole *(If Applicable)*

You have heard evidence that [witness name(s)] is [awaiting sentence] [under investigation]. You may consider this evidence when deciding whether the witness has a bias in favor of one of the parties that may affect his/her willingness to tell the truth.

Authority: Redbook, Instruction No. 2.219.

INSTRUCTION NO. 46

Attempted Bribery, Coercion or Intimidation of Witness

You have heard evidence that the defendant may have attempted to persuade Persons D1 and D2 to testify falsely. It is up to you to decide if he attempted to persuade Persons D1 and D2 to testify and if such testimony would have been false. If you find he did so, you may consider this evidence as tending to show his feelings of guilt, which you may, in turn, consider as tending to show actual guilt. On the other hand, you may also consider he may have attempted to persuade Persons D1 and D2 for reasons fully consistent with innocence in this case.

If you find that the defendant attempted to persuade Persons D1 and D2 to testify falsely, you should consider this evidence along with all the other evidence in the case and give it as much weight you think it fairly deserves.

Authority: Redbook, Instruction No. 2.304. The names of Persons D1 and D2 should be inserted at the time the instructions should be given.

INSTRUCTION NO. 47

Statements of the Defendant—Substantive Evidence

You have heard evidence that the defendant made statements to law enforcement about the crime charged. You should consider all the circumstances, including whether law enforcement recorded the statement, in deciding whether he made the statement. If you find that he did make the statement, you must decide how much weight to give the statement. For example, you may consider whether he made the statement voluntarily and understood what he was saying. You may consider whether he was forced, threatened, or pressured, either physically or psychologically, and whether he was promised any reward or benefit for making the statement. You may consider all of the conversations between him and the law enforcement. You may consider whether law enforcement warned him of his rights. You may consider where and when the statement was given; the duration of any questioning; who was present during some or all of the questioning of the defendant; and whether the law enforcement recorded some or all of the conversations. You may consider the age, education, experience, intelligence and the physical and mental condition of the defendant.

Authority: Redbook, Instruction No. 2.305.

INSTRUCTION NO. 48

Translation of Foreign Language Document or Recording

I have admitted documents that are in Russian along with an English translation. Although some of you may know Russian, it is important that all jurors consider the same evidence. Therefore, you must accept the English translation contained in the transcript.

If, however, you have a question as to the accuracy of the English translation, you should bring this matter to my attention immediately by raising your hand. You should not ask your question or make any comment about the translation in the presence of the other jurors, or otherwise share your question or concern with any of them. I will take steps to see if your question can be answered and any discrepancy resolved. If, however, after such efforts a discrepancy remains, you must rely only upon the official English translation provided by the court interpreter and not on your own translation.

Authority: Redbook, Instruction No. 2.311.

INSTRUCTION NO. 49

Evidence of Other Crimes Admitted to Show Motive, Identity, or Common Scheme or Plan (If Applicable)

You have heard evidence that Mr. Manafort [description of other crimes evidence]. It is up to you to decide whether to accept that evidence.

If you find that the defendant [description of other crimes evidence], you may use this evidence only for the limited purpose of deciding whether:

- (1) The defendant had a motive to commit the offenses charged in the indictment, including the conspiracy to defraud the United States and commit offenses against the United States.
- (2) The circumstances of the other crimes and charged offenses are so similar that it is likely that the person who [description of other crimes evidence] also committed the [name of offense(s)] charged in the indictment.
- (3) The [describe the other crimes conduct] and the [name of offense[s]] charged in the indictment] are part of a common scheme or plan.

If you conclude that:

- (4) Mr. Manafort had such a motive.
- (5) [description of other crimes evidence] is so similar to the charged offenses that it is likely that the same person committed both of them
- (6) There was a common scheme or plan.

You may use this evidence in determining whether the government has proved beyond a reasonable doubt that Mr. Manafort is the person who committed the [name of offense(s)] charged in the [indictment].

You may not use this evidence for any other purpose. Mr. Manafort is only on trial for the crimes charged. He is not charged in this case with any offense relating to [describe the other

crimes conduct], and you may not use this evidence to conclude that Manafort has a bad character, or that Manafort has a criminal personality. The law does not allow you to convict him/her simply because you believe he may have done bad things not specifically charged as crimes in this case.

Authority: Redbook, Instruction No. 2.321.

INSTRUCTION NO. 50

Evidence of Other Crimes Admitted to Show Intent, Absence of Mistake, or Knowledge (If Applicable)

You have heard evidence that the defendant [describe other crimes evidence]. It is up to you to decide whether to accept that evidence.

You must first decide, without considering [describe other crimes evidence] at all, whether the government has proved beyond a reasonable doubt that the defendant [insert actus reus]. If you find that the government has proved beyond a reasonable doubt, that Mr. Manafort [insert actus reus], then you may consider the evidence that the s/he [describe other crimes evidence].]

If you find that Mr. Manafort [describe other crimes evidence], you may use this evidence only for the limited purpose of deciding/determining whether the government has proved beyond a reasonable doubt that Mr. Manafort [intended to [insert object of intent] [acted knowingly and on purpose, and not by mistake or by accident] [knew that [insert purpose for which the evidence was introduced]]].

You may not use this evidence for any other purpose. Mr. Manafort is only on trial for the crimes charged. The defendant is not charged in this case with any offense relating to [describe the other crimes conduct], and you may not use this evidence to conclude that s/he has a bad character, or that Mr. Manafort has a criminal personality. The law does not allow you to convict the defendant simply because you believe he may have done bad things not specifically charged as crimes in this case.

Authority: Redbook, Instruction No. 2.321.

INSTRUCTION NO. 51

Multiple Counts—One Defendant

Each count of the indictment charges a separate offense. You should consider each offense, and the evidence which applies to it, separately, and you should return separate verdicts as to each count. The fact that you may find the defendant guilty or not guilty on any one count of the indictment should not influence your verdict with respect to any other count of the indictment.

Authority: Redbook, Instruction No. 2.402.

INSTRUCTION NO. 52

Unanimity—General

A verdict must represent the considered judgment of each juror, and in order to return a verdict, each juror must agree on the verdict. In other words, your verdict must be unanimous.

Authority: Redbook, Instruction No. 2.405.

INSTRUCTION NO. 53

Verdict Form Explanation

You will be provided with a Verdict Form for use when you have concluded your deliberations. The form is not evidence in this case, and nothing in it should be taken to suggest or convey any opinion by me as to what the verdict should be. Nothing in the form replaces the instructions of law I have already given you, and nothing in it replaces or modifies the instructions about the elements which the government must prove beyond a reasonable doubt. The form is meant only to assist you in recording your verdict.

Authority: Redbook, Instruction No. 2.407.

INSTRUCTION NO. 54

Proof of State of Mind

Someone's intent or knowledge ordinarily cannot be proved directly, because there is no way of knowing what a person is actually thinking, but you may infer someone's intent or knowledge from the surrounding circumstances. You may consider any statement made or acts done or omitted by the defendant, and all other facts and circumstances received in evidence which indicate his intent or knowledge.

You may infer, but are not required to infer, that a person intends the natural and probable consequences of acts s/he intentionally did or intentionally did not do. It is entirely up to you, however, to decide what facts to find from the evidence received during this trial. You should consider all the circumstances in evidence that you think are relevant in determining whether the government has proved beyond a reasonable doubt that the defendant acted with the necessary state of mind.

Authority: Redbook, Instruction No. 3.101.

INSTRUCTION NO. 55

Willfully Causing an Act to be Done

You may find the defendant guilty of the crime charged in the indictment without finding that he personally committed each of the acts constituting the offense or was personally present at the commission of the offense. A defendant is responsible for an act which he willfully causes to be done if the act would be criminal if performed by him/her directly or by another. To “cause” an act to be done means to bring it about. You may convict the defendant of the offense charged if you find that the government has proved beyond a reasonable doubt each element of the offense and that the defendant willfully caused such an act to be done, with the intent to commit the crime.

Authority: Redbook, Instruction No. 3.102.

INSTRUCTION NO. 56

“On or About” or “In or Around” Proof

The indictment information charges that certain offenses were committed “on or about” and “in or around” certain dates. The proof need not establish with certainty the exact date of the alleged offense. It is sufficient if the evidence in the case establishes beyond a reasonable doubt that the offense was committed on a date reasonably near the date alleged.

Authority: Redbook, Instruction No. 2.103.

INSTRUCTION NO. 57

Aiding and Abetting

You may find the defendant guilty of the crime charged in the indictment without finding that he personally committed each of the acts that make up the crime or that he was present while the crime was being committed. Any person who in some way intentionally participates in the commission of a crime can be found guilty either as an aider and abettor or as a principal offender. It makes no difference which label you attach. The person is as guilty of the crime as he would be if he had personally committed each of the acts that make up the crime.

To find that a defendant aided and abetted in committing a crime, you must find that the defendant knowingly associated himself with the commission of the crime, that he participated in the crime as something he wished to bring about, and that he intended by his actions to make it succeed.

Some affirmative conduct by the defendant in planning or carrying out the crime is necessary. Mere physical presence by Mr. Manafort at the place and time the crime is committed is not by itself sufficient to establish his/her guilt. It is not necessary that you find that the defendant was actually present while the crime was committed.

The government is not required to prove that anyone discussed or agreed upon a specific time or method of committing the crime. The government is not required to prove that the crime was committed in the particular way planned or agreed upon. Nor need the government prove that the principal offender and the person alleged to be the aider and abettor directly communicated with each other.

I have already instructed you on the elements of each of the offenses with which Manafort is charged. With respect to the charges of acting as an unregistered agent of a foreign principal (Count Three), making false and misleading FARA statements (Count Four), and Making false

statements (Count Five) regardless of whether Manafort is an aider and abettor or a principal offender, the government must prove beyond a reasonable doubt that Manafort personally acted knowingly and willfully. With respect to the charge of obstructing justice (Count Six), regardless of whether Manafort is an aider and abettor or a principal offender, the government must prove beyond a reasonable doubt that Manafort personally acted knowingly and intentionally.

Authority: Redbook, Instruction No. 3.200.

EXHIBIT C

SPECIAL INSTRUCTION NO. 1

Requirements under the Foreign Agent Registration Act

The Foreign Agent Registration Act provides that no person shall act as an agent of a foreign principal unless he has filed with the Attorney General a true and complete registration statement and supplements thereto as required that agents of a foreign government or other foreign principal, unless certain exceptions apply.

When registration is required, federal law also specifically identifies steps a person must take in order to complete the registration and supplements. Every person who becomes an agent of a foreign principal shall, within ten days thereafter, file with the Attorney General, a registration statement under oath on a form prescribed by the Attorney General.

The statement must contain the following information:

- (1) The registrant's name, principal business address, and all other business addresses in the United States or elsewhere, and all residence addresses, if any.
- (2) The status of the registrant; if an individual, nationality; if a partnership, name, residence addresses, and nationality of each partner and a true and complete copy of its articles of copartnership; if an association, corporation, organization, or any other combination of individuals, the name, residence addresses, and nationality of each director and officer and of each person performing the functions of a director or officer and a true and complete copy of its charter, articles of incorporation, association, constitution, and bylaws, and amendments thereto; a copy of every other instrument or document and a statement of the terms and conditions of every oral agreement relating to its organization, powers, and purposes; and a statement of its ownership and control.
- (3) A comprehensive statement of the nature of registrant's business; a complete list of registrant's employees and a statement of the nature of the work of each; the name and

address of every foreign principal for whom the registrant is acting, assuming or purporting to act or has agreed to act; the character of the business or other activities of every such foreign principal, and, if any such foreign principal be other than a natural person, a statement of the ownership and control of each; and the extent, if any, to which each such foreign principal is supervised, directed, owned, controlled, financed, or subsidized, in whole or in part, by any government of a foreign country or foreign political party, or by any other foreign principal. If this information changes, the registrant shall give notice to the Attorney General of any changes therein within ten days after such changes occur.

- (4) Copies of each written agreement and the terms and conditions of each oral agreement, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is an agent of a foreign principal; a comprehensive statement of the nature and method of performance of each such contract, and of the existing and proposed activity or activities engaged in or to be engaged in by the registrant as agent of a foreign principal for each such foreign principal, including a detailed statement of any such activity which is a political activity. If this information changes, the registrant shall give notice to the Attorney General of any changes therein within ten days after such changes occur.
- (5) The nature and amount of contributions, income, money, or thing of value, if any, that the registrant has received within the preceding sixty days from each such foreign principal, either as compensation or for disbursement or otherwise, and the form and time of each such payment and from whom received.
- (6) A detailed statement of every activity which the registrant is performing or is assuming or purporting or has agreed to perform for himself or any other person other than a foreign

principal and which requires his registration hereunder, including a detailed statement of any such activity which is a political activity. If this information changes, the registrant shall give notice to the Attorney General of any changes therein within ten days after such changes occur.

- (7) The name, business, and residence addresses, and if an individual, the nationality, of any person other than a foreign principal for whom the registrant is acting, assuming or purporting to act or has agreed to act under such circumstances as require his registration hereunder; the extent to which each such person is supervised, directed, owned, controlled, financed, or subsidized, in whole or in part, by any government of a foreign country or foreign political party or by any other foreign principal; and the nature and amount of contributions, income, money, or thing of value, if any, that the registrant has received during the preceding sixty days from each such person in connection with any of the activities described previously, either as compensation or for disbursement or otherwise, and the form and time of each such payment and from whom received.
- (8) A detailed statement of the money and other things of value spent or disposed of by the registrant during the preceding sixty days in furtherance of or in connection with activities which require his registration hereunder and which have been undertaken by him either as an agent of a foreign principal or for himself or any other person or in connection with any activities relating to his becoming an agent of such principal, and a detailed statement of any contributions of money or other things of value made by him during the preceding sixty days in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

- (9) Copies of each written agreement and the terms and conditions of each oral agreement, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is performing or assuming or purporting or has agreed to perform for himself or for a foreign principal or for any person other than a foreign principal any activities which require his registration hereunder. If this information changes, the registrant shall give notice to the Attorney General of any changes therein within ten days after such changes occur.
- (10) Such further statements and such further copies of documents as are necessary to make the statements made in the registration statement and supplements thereto, and the copies of documents furnished therewith, not misleading.

Whenever the registrant is an association, corporation, organization, or any other combination of individuals, the following documents shall be filed [as part of the registration]:

- (1) A copy of the registrant's charter, articles of incorporation or association, or constitution, and a copy of its bylaws, and amendments thereto.
- (2) A copy of every other instrument or document, and a statement of the terms and conditions of every oral agreement, relating to the organization, powers and purposes of the registrant.

Whenever a registrant, within the United States, receives or collects contributions, loans, money, or other things of value, as part of a fund-raising campaign, for or in the interests of his foreign principal, he shall file a statement setting forth the amount of money or the value of the thing received or collected, the names and addresses of the persons from whom such money or thing of value was received or collected, and the amount of money or a description of the thing of value transmitted to the foreign principal as well as the manner and time of such transmission.

The registration statement and supplements thereto shall be executed under oath as follows: If the registrant is an individual, by him; if the registrant is a partnership, by the majority of the members thereof; if the registrant is a person other than an individual or a partnership, by a majority of the officers thereof or persons performing the functions of officers or by a majority of the board of directors thereof or persons performing the functions of directors, if any.

All statements, exhibits, amendments, and other documents and papers required to be filed under [the Foreign Agent Registration Act] must be submitted in triplicate to the Registration Unit of the U.S. Department of Justice's National Security Division. Filing of such documents may be made in person or by mail.

A registrant shall pay a registration fee with each initial registration statement and each supplemental registration statement at the time such registration statement is filed.

Each statement, amendment, exhibit, or notice required to be filed under FARA shall be submitted in the English language. An exhibit may be filed even though it is in a foreign language if it is accompanied by an English translation certified under oath by the translator before a notary public, or other person authorized by law to administer oaths for general purposes, as a true and accurate translation.

Authority: 22 U.S.C. §§ 612(a)–(c); 28 C.F.R. §§ 5.201(c), (e); 28 C.F.R. § 5.206(a); 28 C.F.R. § 5.3; 28 C.F.R. § 5.5.

SPECIAL INSTRUCTION NO. 2

Supplemental Filings under FARA

Every agent of a foreign principal who has filed a registration statement must, within thirty days after the expiration of each period of six months succeeding such filing, file with the Attorney General a supplement thereto under oath, on a form prescribed by the Attorney General, which shall set forth with respect to such preceding six months' period certain facts listed the Attorney General.

The obligation to file a supplemental statement at 6-month intervals during the agency relationship continues even if the registrant has not engaged during the period in any activity in the interests of his foreign principal.

A registrant must, within 30 days after the termination of his obligation to register, file a final statement on the supplemental statement form with the Registration Unit for the final period of the agency relationship not covered by any previous statement.

Authority: 22 U.S.C. § 612(b); 28 C.F.R. §§ 5.203, 5.205.

SPECIAL INSTRUCTION NO. 3

Filing and Labeling of Political Propaganda

Every person within the United States who is an agent of a foreign principal and required to register under the provisions of [the Foreign Agent Registration Act] and who transmits or causes to be transmitted in the United States mails or by any means or instrumentality of interstate or foreign commerce any informational materials for or in the interests of such foreign principal (i) in the form of prints, or (ii) in any other form which is reasonably adapted to being, or which he believes will be, or which he intends to be, disseminated or circulated among two or more persons shall, not later than forty-eight hours after the beginning of the transmittal thereof, file with the Attorney General two copies thereof.

Authority: 22 U.S.C. § 614

SPECIAL INSTRUCTION NO. 4

Books and Records

Every agent of a foreign principal registered under [the Foreign Agent Registration Act] shall keep and preserve while he is an agent of a foreign principal such books of account and other records with respect to all his activities, the disclosure of which is required under the provisions of this subchapter, in accordance with such business and accounting practices, as the Attorney General, having due regard for the national security and the public interest, may by regulation prescribe as necessary or appropriate for the enforcement of the provisions of this subchapter and shall preserve the same for a period of three years following the termination of such status. Until regulations are in effect under this section every agent of a foreign principal shall keep books of account and shall preserve all written records with respect to his activities. Such books and records shall be open at all reasonable times to the inspection of any official charged with the enforcement of this subchapter. It shall be unlawful for any person willfully to conceal, destroy, obliterate, mutilate, or falsify, or to attempt to conceal, destroy, obliterate, mutilate, or falsify, or to cause to be concealed, destroyed, obliterated, mutilated, or falsified, any books or records required to be kept under the provisions of this section.

A registrant shall keep and preserve in accordance with [this provision of the Foreign Agent Registration Act] the following books and records:

- (1) All correspondence, memoranda, cables, telegrams, teletype messages, and other written communications to and from all foreign principals and all other persons, relating to the registrant's activities on behalf of, or in the interest of any of his foreign principals.
- (2) All correspondence, memoranda, cables, telegrams, teletype messages, and other written communications to and from all persons, other than foreign principals, relating to the

registrant's political activity, or relating to political activity on the part of any of the registrant's foreign principals.

- (3) Original copies of all written contracts between the registrant and any of his foreign principals.
- (4) Records containing the names and addresses of persons to whom informational materials have been transmitted.
- (5) All bookkeeping and other financial records relating to the registrant's activities on behalf of any of his foreign principals, including canceled checks, bank statements, and records of income and disbursements, showing names and addresses of all persons who paid moneys to, or received moneys from, the registrant, the specific amounts so paid or received, and the date on which each item was paid or received.
- (6) If the registrant is a corporation, partnership, association, or other combination of individuals, all minute books.
- (7) Such books or records as will disclose the names and addresses of all employees and agents of the registrant, including persons no longer acting as such employees or agents.
- (8) Such other books, records, and documents as are necessary properly to reflect the activities for which registration is required.

Officials of the National Security Division and the Federal Bureau of Investigation are authorized under [this section of the Foreign Agent Registration Act] to inspect the books and records.

Authority: 22 U.S.C. § 615; 28 C.F.R. § 5.500; 28 C.F.R. § 5.501

SPECIAL INSTRUCTION NO. 5

Requirements Under the Lobbying Disclosure Act

The Lobbying Disclosure Act provides that no later than 45 days after a lobbyist first makes a lobbying contact or is employed or retained to make a lobbying contact, the lobbyist shall register with the Secretary of the Senate and the Clerk of the House of Representatives.

Each registration under this section shall contain the following information:

- (1) The name, address, business telephone number, and principal place of business of the registrant, and a general description of its business or activities.
- (2) The name, address, and principal place of business of the registrant's client, and a general description of its business or activities (if different from paragraph (1)).
- (3) The name, address, and principal place of business of any organization, other than the client, that contributes more than \$5,000 to the registrant or the client in the quarterly period to fund the lobbying activities of the registrant; and actively participates in the planning, supervision, or control of such lobbying activities.
- (4) The name, address, principal place of business, amount of any contribution of more than \$5,000 to the lobbying activities of the registrant, and approximate percentage of equitable ownership in the client (if any) of any foreign entity that—
 - (A) holds at least 20 percent equitable ownership in an organization that contributes more than \$5,000 to the registrant or the client to fund the lobbying activities of the registrant.
 - (B) directly or indirectly, in whole or in major part, plans, supervises, controls, directs, finances, or subsidizes the activities of the client or any organization identified under paragraph (3); or

- (C) is an affiliate of the client or any organization identified under paragraph (3) and has a direct interest in the outcome of the lobbying activity;
- (5) A statement of—
 - (A) the general issue areas in which the registrant expects to engage in lobbying activities on behalf of the client; and
 - (B) to the extent practicable, specific issues that have (as of the date of the registration) already been addressed or are likely to be addressed in lobbying activities.
- (6) The name of each employee of the registrant who has acted or whom the registrant expects to act as a lobbyist on behalf of the client and, if any such employee has served as a covered executive branch official or a covered legislative branch official in the 20 years before the date on which the employee first acted as a lobbyist on behalf of the client, the position in which such employee served.

Authority: 2 U.S.C. § 1603.

SPECIAL INSTRUCTION NO. 6

Reports Under the Lobbying Disclosure Act

No later than 20 days after the end of the quarterly period beginning on the first day of January, April, July, and October of each year in which a registrant is registered pursuant to the Lobbying Disclosure Act, each registrant shall file a report with the Secretary of the Senate and the Clerk of the House of Representatives on its lobbying activities during such quarterly period. A separate report shall be filed for each client of the registrant.

Each quarterly report filed under subsection (a) shall contain—

- (1) The name of the registrant, the name of the client, and any changes or updates to the information provided in the initial registration, including information under section 1603(b)(3) of this title.
- (2) For each general issue area in which the registrant engaged in lobbying activities on behalf of the client during the quarterly period,
 - (A) A list of the specific issues upon which a lobbyist employed by the registrant engaged in lobbying activities, including, to the maximum extent practicable, a list of bill numbers and references to specific executive branch actions;
 - (B) A statement of the Houses of Congress and the Federal agencies contacted by lobbyists employed by the registrant on behalf of the client;
 - (C) A list of the employees of the registrant who acted as lobbyists on behalf of the client; and
 - (D) A description of the interest, if any, of any foreign entity that contributed more than \$5,000 in funding lobbying activities, that controlled or supervised the activities of the organization, or is an affiliate of the client.

- (3) In the case of a lobbying firm, a good faith estimate of the total amount of all income from the client (including any payments to the registrant by any other person for lobbying activities on behalf of the client) during the quarterly period, other than income for matters that are unrelated to lobbying activities,
- (4) In the case of a registrant engaged in lobbying activities on its own behalf, a good faith estimate of the total expenses that the registrant and its employees incurred in connection with lobbying activities during the quarterly period.
- (5) For each client, immediately after listing the client, an identification of whether the client is a State or local government or a department, agency, special purpose district, or other instrumentality controlled by one or more State or local governments.

Authority: 2 U.S.C. § 1604.

EXHIBIT D

From: [AAW](#)
To: ["tezehnl@gmail.com"](#); [Kevin Downing \(kevindowning@kdowninglaw.com\)](#); [Richard Westling](#); [Jay Nanavati](#)
Cc: [GDA](#); [BVG](#); [LMM](#); [UEA](#)
Subject: RE: DC Notice
Date: Friday, July 13, 2018 11:01:34 AM

Kevin, Richard, Tom, and Jay:

I write to provide you notice of the same expert testimony, intent to use summaries, and request for reciprocal discovery in connection with the D.C. trial before Judge Amy Berman Jackson. Please let us know of any objections that should be included in our joint pretrial statement due August 1 (paragraph e)).

Andrew Weissmann
Special Counsel's Office
(202) 514-1746

NOTICE: This email (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient (or the recipient's agent), you are hereby notified that any dissemination, distribution, copying, or use of this email or its contents is strictly prohibited. If you received this email in error, please notify the sender immediately and destroy all copies.

From: UEA
Sent: Wednesday, July 11, 2018 8:20 PM
To: 'tezehnl@gmail.com' <tezehnl@gmail.com>; Kevin Downing (kevindowning@kdowninglaw.com) <kevindowning@kdowninglaw.com>; Richard Westling <rwestling@ebglaw.com>; Jay Nanavati <jnanavati@kflaw.com>
Cc: AAW <AAW@jmd.usdoj.gov>; GDA <GDA@jmd.usdoj.gov>; BVG <BVG@jmd.usdoj.gov>; LMM <LMM@jmd.usdoj.gov>
Subject: 1:18CR83 (EDVA) Witness Notice

Counsel—

Attached please find notice regarding a number of potential government witnesses. Thanks.

Uzo



U.S. Department of Justice

The Special Counsel's Office

Washington, D.C. 20530

July 11, 2018

VIA E-MAIL

Kevin Downing, Esq.
Law Offices of Kevin Downing
815 Connecticut Avenue, N.W.
Suite 730
Washington, D.C. 20006

Re: *United States v. Paul J. Manafort, Jr.*

Crim. No. 1:18CR83-1 (TSE) (E.D. Va.)

Dear Mr. Downing:

We write to provide notice of several matters ahead of trial in this case. If you intend to publicly disclose any of the attached resumes, draft charts, or draft spreadsheets, please first notify us and allow us to seek appropriate judicial relief.

Expert Witness Notice

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure and Rules 702, 703, and 705 of the Federal Rules of Evidence, the United States hereby serves notice that it may call Morgan Magionos, Michael Welch, and Renee Michael in its case-in-chief as expert witnesses. As described below, these witnesses prepared various summary charts the government intends to introduce at trial. The government does not believe that the preparation of these charts requires expert testimony. Nonetheless, we are advising you that if necessary, we will seek to qualify the witnesses as experts.

Morgan Magionos

During its case-in-chief, the government will present a summary witness trained in forensic accounting and tracing. This witness, Morgan Magionos, is a forensic accountant employed by the Federal Bureau of Investigation ("FBI") and her curriculum vitae is enclosed with this notice as Exhibit A. Ms. Magionos' testimony will be adduced to assist the jury to understand the evidence or to determine any facts in issue. Ms. Magionos will provide testimony regarding her background and training, the nature of her analysis, and methods or software used

to assist her. The witness will also provide testimony, to include opinions and inferences, regarding financial and bank records she reviewed relating to the indictment.

Specifically, Ms. Magionos will testify in the government's case-in-chief and, as necessary, in rebuttal to the following: She is a forensic accountant with the FBI. She will testify that she reviewed and analyzed financial records belonging to Paul Manafort, Jr. ("Manafort"), his tax preparers, his accountants, and his related foreign and domestic entities to determine the nature of account ownership, nature of transactions, beneficiaries of transactions, balances in accounts, as well as specific credits and debits to various financial accounts. Furthermore, she reviewed real estate and business records, including invoices, contracts, and statements, for vendors that provided goods and services to Manafort and related entities and individuals. She traced and analyzed financial transactions to determine the source and disposition of funds. She prepared various draft charts summarizing the above referenced analysis, which are enclosed with this notice as Exhibit B. The finalized copies of these schedules will be provided shortly before Ms. Magionos' testimony. The government further reserves the right to offer additional computations, summaries and schedules and to amend any draft computations, summaries and schedules provided to the defense. The bases, reasons, and significance of her testimony are her education, experience, and training in the fields of forensic accounting and tracing.

Michael Welch

During its case-in-chief, the government will present a summary witness trained in taxation and accounting. This witness, Internal Revenue Agent ("IRS") Revenue Agent Michael Welch, will, among other areas of testimony, provide an analysis of the financial records introduced into evidence, including foreign bank records, provide a summary of unreported income received by the defendant, and the tax consequences of the unreported income. The scope of Revenue Agent Welch's testimony will include a substantive review of relevant domestic and foreign bank account records and financial transactions, accounting records, and other trial evidence, including witness testimony. Revenue Agent Welch will also testify generally about events that trigger a duty to report foreign bank accounts to the IRS and the Department of the Treasury. Revenue Agent Welch's curriculum vitae is attached to this letter as Exhibit C.

Revenue Agent Welch's testimony will assist the jury by providing specialized tax and accounting knowledge in order to explain the tax consequences of the transactions contained in the government's evidence, which is admissible and relevant. Pursuant to Fed. R. Crim. P. 16(a)(1)(G), the government is providing the defendant with Revenue Agent Welch's draft schedules, summaries and computations (attached as Exhibit D), which are based upon Revenue Agent Welch's review of the discovery materials provided to defense counsel pursuant to Fed. R. Crim. P. 16. Revenue Agent Welch reserves the right to amend his computations, summaries and schedules once he has heard all testimony and reviewed all exhibits that are actually admitted at trial. The finalized copies of these schedules will be provided shortly before Revenue Agent Welch's testimony. The government further reserves the right to offer additional computations, summaries and schedules and to amend any draft computations, summaries and

schedules provided to the defense. The schedules and summaries contain Revenue Agent Welch's preliminary conclusions as to the tax consequences of the government's evidence.

The anticipated basis for Revenue Agent Welch's opinions will be the documents and oral testimony offered at trial, the summaries of voluminous evidence admissible pursuant to Fed. R. Evid. 1006, and his experience and training in the field of taxation. His testimony will have its basis in the Internal Revenue Code and its accompanying regulations, and will include his understanding of the relevant law and application of the facts as he understands them.

Renee Michael

During its case-in-chief, the government will present a summary witness trained in forensic accounting and tracing. This witness, Renee Michael, is a forensic accountant employed by the Federal Bureau of Investigation ("FBI") and her curriculum vitae is enclosed with this notice as Exhibit E. Ms. Michael's testimony will be adduced to assist the jury to understand the evidence or to determine any facts in issue. Ms. Michael will provide testimony regarding her background and training, the nature of her analysis, and methods or software used to assist her. The witness will also provide testimony, to include opinions and inferences, regarding financial and bank records she reviewed relating to the indictment. Specifically, Ms. Michael will testify in the government's case-in-chief and, as necessary, in rebuttal to the following: She is a forensic accountant with the FBI. She will testify that she reviewed and analyzed public filings and financial records belonging to Manafort, his tax preparers, his accountants, and his related foreign and domestic entities in order to determine the nature of transactions, beneficiaries of transactions, as well as specific credits and debits to various financial accounts. She also traced and analyzed financial transactions to determine the source and disposition of funds. She prepared a draft chart summarizing the above referenced analysis, which is enclosed with this notice as Exhibit F. The finalized copy of this chart will be provided shortly before Ms. Michael's testimony. The government further reserves the right to offer additional computations, summaries and schedules and to amend any draft computations, summaries and schedules provided to the defense. The bases, reasons, and significance of her testimony are her education, experience, and training in the fields of forensic accounting and tracing.

Notice of Intent to Use Summaries Pursuant to Fed. R. Evid. 1006

Through its witnesses, the government intends to offer summaries of voluminous evidence during the presentation of its case-in-chief, consisting of summary schedules of voluminous bank, tax, and other records, including but not limited to deposits, withdrawals and wire transfers from various domestic and foreign bank accounts. Rule 1006 provides that "the contents of voluminous writings, records, or photographs which cannot conveniently be examined in court may be presented in the form of a chart, summary, or calculation . . ." Fed. R. Evid. 1006. Rule 1006 permits the introduction of such summary charts where the voluminous writings underlying the chart cannot be easily examined in court. Once admitted, a Rule 1006 exhibit constitutes substantive evidence. *See United States v. Janati*, 374 F.3d 263, 272-73 (4th Cir. 2004). The information in the government's summary exhibits will be derived from admissible evidence and in some cases from exhibits the government will introduce at trial. The Fourth Circuit has indicated that summary charts comply with Rule 1006 if the chart summarizing evidence is accurate and the underlying records are otherwise admissible as

evidence. *Id.* Additionally, the underlying documentation have been made available to the opposing party for examination. The government has produced to defendant the documents underlying the summary charts and has already provided draft versions of many of these summaries.

Reciprocal Discovery Request Pursuant to Fed. R. Crim. P. 16(b)(1)(C)

As you know, on June 7, 2018, the government in writing requested all discovery from the defendant to which it is entitled, including expert notice. Pursuant to Fed. R. Crim. P. 16(b)(1)(C), and the expert disclosures provided herein and in the government's numerous discovery productions beginning on November 17, 2017, the government has and again does request reciprocal disclosure of the defendant's expert or experts, if any, including a *curriculum vitae* for any such expert and a written summary of the proposed testimony by close of business Friday, July 13, 2018. If we do not receive such notice by Friday, we intend to move to preclude any such witness presented at trial.

Respectfully submitted,

ROBERT S. MUELLER, III
Special Counsel

Dated: July 11, 2018

Uzo Asonye
Assistant United States Attorney
Eastern District of Virginia

_____/s/
Andrew Weissmann
Greg D. Andres
Special Counsel's Office
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20530
Telephone: (202) 616-0800

Attorneys for the United States of America

cc: Thomas Zehnle, Esq. (via e-mail)
Richard Westling, Esq. (via e-mail)
Jay Nanavati, Esq. (via e-mail)

EXHIBIT E

—Government's Proposed Exhibit List— U.S. v. Paul J. Manafort, Jr. (1:17-cr-201-1 (ABJ))					
Ex. No.	Date	Description	Obj.	Off'd	Adm.
1		[Exhibit Removed]			
2		[Exhibit Removed]			
3		[Exhibit Removed]			
4		[Exhibit Removed]			
5	2/24/2018	Call Detail Report			
6	2/23/2018 - 3/1/2018	Call Detail Report			
7	2/25/2018	Call Detail Report			
8	2/27/2018	Call Detail Report			
9	12/28/2015 - 7/25/2017	2010.01.01 - 2017.07.25 P. Manafort AT&T Phone Records			
10		[Exhibit Removed]			
11	2001-2018	FinCEN Certifications			
12	6/1/2008 - 6/30/2008	First Republic Bank Accounts XXXXXXXX6573 and XXXXXXXX7373 for Jesand			
13		First Republic Bank/Pershing Account XXXXXXXX5358 for J. Manafort			
14	2/1/2012 - 2/29/2012	First Republic Bank Account XXXXXXXX9730 for P. and K. Manafort			
15	2/10/2012 - 2/29/2012	First Republic Bank Account XXXXXXXX5868 for MC Soho			
16	10/4/2013	Pompolo Limited Incorporation Documents; United Kingdom			
17	2013	Bank Records; Pompolo Limited; United Kingdom			
18	9/9/2009	Email; Subject: RE: LOAV			
19	8/21/2011	Email; Subject: 2010 Taxes			
20	9/9/2011	Peranova Loan Agreement			
21	10/4/2011	Email; Subject: FW: 2010 tax filing			
22	2011	2011 Davis Manafort Partners General Ledger			
23	2011	2011 Davis Manafort Partners Financial Statements			
24	2011	2011 P. Manafort and K. Manafort General Ledger			
25	2011	2011 DMP International General Ledger			
26	2011	2011 DMP International Financial Statements			
27	2011	2011 Davis Manafort Partners Ledger Report			
28	6/29/2012	Email; Subject: Re: Foreign Accounts			
29	9/6/2012	Email; Subject: Re: DMP International, LLC tax return- DUE 9/17/12			
30	9/16/2012	Email; Subject: FW: FINAL FINAL Questions			
31	10/14/2012	Form; P. Manafort Signed IRS Form 8879			
32	12/31/2012	MAN001-07 DMP International			
33	2012	2012 DMP International General Ledger			
34	2012	2012 DMP International Financial Statements			
35	2012	2012 P. Manafort and K. Manafort General Ledger			
36	2/5/2013	Shipment from Kositzka, Wicks and Company to P. Manafort			
37	6/24/2013	Email; Subject: Re: Foreign account report due 6/30/13			
38	8/29/2013	Email; Subject: Paul unidentified transaction			
39	9/3/2013	Ledger Report; DMP International Ledger Reports – Peranova Entries			
40	9/11/2013	Email; Subject: Re: DMP International			
41	2013	2013 DMP International General Ledger			
42	2013	2013 DMP International Financial Statements			
43	2013	2013 P. Manafort and K. Manafort Financial Statements			
44	8/26/2014	Email; Subject: RE: Paul's pending matters			
45	9/2/2014	Email; Subject: Re: Union Street			
46	9/4/2014	Email; Subject: Re: Paul's tax returns - more questions			
47	12/17/2014	Email; Subject: Call with Gates - for the 2014 file			
48	2014	2014 DMP International General Ledger			
49	2014	2014 DMP International Financial Statements			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
50	2014	2014 P. Manafort and K. Manafort Financial Statements			
51	2014	Form; DMP International 2014 1099-MISC Form			
52	2014	TB-01 - Adjusted Trial Balance (2014); DMP International			
53	1/8/2015	Email; Subject: Re: Trump - UBS Mortgage			
54	3/19/2015	Email; Subject: Re: NYC Property LLCs			
55		[Exhibit Removed]			
56	4/13/2015	Email; Subject: RE: DMP International			
57	8/26/2015	Email; Subject: Re: Pending Items			
58	9/11/2015	Email; Subject: Re: DMP Sports Tickets			
59	9/15/2015	Email; Subject: Re: Call Me			
60	9/15/2015	Report; DMP International Ledger Report – Telmar Investments			
61	10/7/2015	Email; Subject: Re: Paul's 1040			
62	2015	2015 DMP International General Ledger			
63	2015	2015 DMP International Financial Statements			
64	2015	2015 P. Manafort and K. Manafort Financial Statements			
65	2015	TB-01 - Adjusted Trial Balance (2015); DMP International			
66	3/16/2016	Email; Subject: FW: DMP International - Open Items			
67	3/25/2016	DMP International Ledger Report re Peranova			
68	4/5/2016	Email; Subject: Re: DMP International Questions			
69	4/12/2016	Email; Subject: Re: Pending Questions			
70	4/15/2016	Email; Subject: Fwd: Pending Questions			
71	9/4/2016	Email; Subject: RE: Paul's tax returns - more questions			
72	9/14/2016	Email; Subject: Re: Updates -DMP			
73	10/3/2016	Email; Subject: Re: Paul Manafort's pending matters			
74	10/4/2016	Email; Subject: FW: Paul Manafort's pending matters			
75	2016	2016 DMP International General Ledger			
76	2016	2016 DMP International YTD P&L			
77	2016	2016 DMP International YTD Financial Statement			
78	2016	2016 DMP International Financial Statement			
79	2016	2016 P. Manafort and K. Manafort Financial Statements			
80	2001-2011	Invoices; Selected KWC Invoices Manafort-Related Entities			
81	2007-2015	Chart; KWC Manafort Tax Returns Chart			
82	2012-2016	KWC Engagement Letters (2012-2016)			
83	2013-2014	DMP International Funds Due to Peranova			
84	6/8/2017	Report; Adjusting Journal Entries Report for the Period Ending 12/31/2014			
85	8/21/2012	Check; A. Manafort to McEneaney			
86	8/21/2012	Sales Contract; 1046 N. Edgewood St, Arlington, VA			
87	8/31/2012	Receipt; A. Manafort Landtech Receipt			
88	9/1/2012	Email; Subject: Fwd: 1046 N. Edgewood St			
89	9/10/2012	Settlement Statement			
90	9/10/2012	Chart; Purchase of 1046 N. Edgewood St, Arlington, VA			
91		Cyprus Incorporation Documents			
92		Eurobank Documents			
93		Hellenic Bank Documents			
94		Bank of Cyprus Documents			
95		Bank of Cyprus Documents			
96		Accounting Records			
97		Hellenic Bank Documents			
98		Certificate of Authenticity; Cyprus Incorporation Documents (91)			
99		Certificate of Authenticity; Eurobank Documents (92)			
100		Certificate of Authenticity; Hellenic Bank Documents (93)			
101		Certificate of Authenticity; Bank of Cyprus (94)			
102		Certificate of Authenticity; Bank of Cyprus (95)			
103		Certificate of Authenticity; Accounting Records (96)			
104		Certificate of Authenticity; Hellenic Bank (97)			
105		St. Vincent and the Grenadines Documents			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
106		St. Vincent and the Grenadines Documents			
107		St. Vincent and the Grenadines Documents			
108		Certificate of Authenticity; St. Vincent and the Grenadines Documents (105)			
109		Certificate of Authenticity; St. Vincent and the Grenadines Documents (106)			
110		Certificate of Authenticity; St. Vincent and the Grenadines Documents (107)			
111		[Exhibit Removed]			
112		[Exhibit Removed]			
113		[Exhibit Removed]			
114		[Exhibit Removed]			
115		[Exhibit Removed]			
116		[Exhibit Removed]			
117		[Exhibit Removed]			
118		[Exhibit Removed]			
119		[Exhibit Removed]			
120		[Exhibit Removed]			
121	9/14/2014	Email; Subject: RE: MC Soho Holdings			
122	2/24/2015	Email; Subject: RE: DMP International			
123	8/26/2015	Email; Subject: RE: DMP International LLC			
124	8/31/2015	Email; Subject: FW: Income			
125		[Exhibit Removed]			
126	9/13/2016	Email; Subject: RE: Manafort related entities - due by 9/15			
127		[Exhibit Removed]			
128	12/1/2012 - 12/31/2012	Bank Records; TD Bank Trust Account XXXXXX5374 for B. Baldinger			
129		[Exhibit Removed]			
130		Documents; Non-Vendor Payments Allowed			
131	1/24/2012	Email; Subject: Transfers			
132	3/3/2011	P&L Statement; Davis Manafort Partners, Inc.			
133	4/15/2011	P&L Statement; Davis Manafort Partners, Inc.			
134		FRB Account 6524 for DMP Intl			
135	3/22/2011	Big Picture Solutions Bank records (2011-2013)			
136		Big Picture Solutions Bank records (2013-2014)			
137		Mercedes-Benz of Alexandria Bank Statement and Wire			
138		KWC Tax Organizers for P. Manafort			
139		P. Manafort American Express Records			
140		Bank Records; Wachovia Account -6368			
141	2005, 2007, 2008	Davis Manafort Partners Trial Balance			
200	2008	P. Manafort 2008 Passport			
201	2016	P. Manafort 2016 Passport			
202		[Exhibit Removed]			
203	2009	R. Gates 2009 Passport			
204	2011	R. Gates 2011 Passport			
205	2013	R. Gates 2013 Passport			
206	2010	1040 Paul J. Manafort 2010 (certified)			
207	2011	1040 Paul J. Manafort 2011 (certified)			
208	2012	1040 Paul J. Manafort 2012 (certified)			
209	2013	1040 Paul J. Manafort 2013 (certified)			
210	2014	1040 Paul J. Manafort 2014 (certified)			
211	2011	1065 DMP International 2011 (certified)			
212	2012	1065 DMP International 2012 (certified)			
213	2013	1065 DMP International 2013 (certified)			
214	2014	1065 DMP International 2014 (certified)			
215	2012-2014	1065 MC Brooklyn 2012-2014 (lack of records)			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
216	2012-2014	1065 MC Soho 2012-2014 (lack of records)			
217	2015	1065 MC Soho 2015 (certified)			
218	2016	1065 MC Soho 2016 (certified)			
219	2010	1120S Davis Manafort Partners 2010 (certified)			
220	2011	1120S Davis Manafort Partners 2011 (certified)			
221	2012-2014	1120S Davis Manafort Partners 2012-2014 (lack of records)			
222	2010	1120S John Hannah 2010 (certified)			
223	2011	1120S John Hannah 2011 (certified)			
224	2012	1120S John Hannah 2012 (certified)			
225	2013	1120S John Hannah 2013 (certified)			
226	2014	1120S John Hannah 2014 (certified)			
227	2005-2007	1040; Paul J. Manafort Tax Transcript			
300	3/21/2011	Email; Subject: update			
301	8/27/2013	Email; Subject: Statement 7-23-13			
302	3/24/2014	Email; Subject: Wire transfers			
303	2010-2014	Invoices; Alan Couture (2010-2014)			
304		Vendor Chart; Alan Couture			
305		Bank Records; Alan Couture			
306	2010	Invoices; Alan Couture (2010)			
307	2011-2014	Invoices; Big Picture Solutions (2011-2014)			
308		Vendor Chart – Big Picture Solutions			
309	10/26/2012	Email; Subject: Manafort Project, Edgewood St, Arlington, VA			
310	11/19/2012	Email; Subject: Re: Contract			
311	11/30/2012 - 2/28/2013	Bank Records; Federal Stone and Brick			
312	5/29/2013	Email; Subject: Re: Invoice from Federal Stone and Brick			
313		Draft of Pergola			
314		Photograph; Pergola			
315		Photograph; Backyard			
316	2010-2012	Invoices; House of Bijan (2010-2012)			
317	2010-2012	Bank Records; House of Bijan			
318		Vendor Chart; House of Bijan			
319		Vendor Chart; Mercedes-Benz of Alexandria			
320		Photographs; Mercedes-Benz owned by P. Manafort			
321	10/1/2012	Invoice; K. Manafort Purchase of Mercedes-Benz SL550			
322	10/1/2012	Buyers Order; K. Manafort Purchase of Mercedes-Benz SL550			
323	10/1/2012	K. Manafort Promissory Note for Mercedes-Benz SL550			
324	10/5/2012	Wire; \$62,750 Wire Transfer from Lucicle Consultants Limited to Mercedes-Benz of Alexandria			
325		Vendor Chart; New Leaf Landscape			
326	2010-2014	Invoices; New Leaf Landscape (2010-2014)			
327	2011-2013	Bank Records; New Leaf Landscape			
328	6/21/2012	Proposal			
329		Photograph; Bridgehampton Driveway			
330		Photograph; Bridgehampton Pond			
331		Photograph; Bridgehampton Side of House			
332		Photograph; Bridgehampton Pergola			
333		Photograph; Bridgehampton Pool House			
334		Photograph; Bridgehampton Putting Green			
335		Vendor Chart; SP&C			
336		Bank Records; SP&C Home Improvement			
337	2010-2014	Invoices; SP&C Home Improvement (2010-2014)			
338		Photograph; Backyard			
339		Photograph; Basement			
340		Photograph; Front of House			
341		Photograph; Kitchen			
342		Photograph; Side of House (1)			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
343		Photograph; Side of House (2)			
344		Photograph; Waterfall Pond			
345		Photograph; Palm Beach Gardens House			
346		Photograph; Outdoor Kitchen			
347	3/23/2014	Email; Subject: Re: Wire			
400	2010	Chart; FBAR Chart for 2010			
401	2011	Chart; FBAR Chart for 2011			
402	2012	Chart; FBAR Chart for 2012			
403	2013	Chart; FBAR Chart for 2013			
404	2014	Chart; FBAR Chart for 2014			
405		Chart; P. Manafort Foreign Entities			
406		Chart; P. Manafort Foreign Bank Accounts			
407		Chart; Aegis Holdings Payments			
408		Chart; Alan Couture Payments			
409		Chart; Big Picture Solutions Payments			
410		Chart; Federal Stone & Brick Payments			
411		Chart; House of Bijan Payments			
412		Chart; J&J Oriental Rug Gallery Payments			
413		Chart; Land Rover of Alexandria Motors Payments			
414		Chart; Mercedes-Benz of Alexandria Payments			
415		Chart; New Leaf Landscape Payments			
416		Chart; Sabatello Construction Payments			
417		Chart; Scott Wilson Landscaping Payments			
418		Chart; Sensoryphile Payments			
419		Chart; SP&C Home Improvement Payments			
420		Chart; Property Overview			
421		Chart; Payment Flow Chart for 29 Howard St Property			
422		Chart; Payment Flow Chart for 1046 N Edgewood St Property			
423		Chart; Payment Flow Chart for 377 Union St Property			
424		Chart; Vendor and Property Payments From Foreign Bank Accounts			
425		Chart; Deposit Analysis – Foreign Source of Funds Received by Foreign Accounts			
426		Chart; P. Manafort Summary of Tax Returns			
427		Summary of Foreign Wires to 3rd Party Vendors for the Benefit of Paul Manafort			
428		Chart; P. Manafort Reported Personal Income			
429		Chart; Analysis of Foreign Bank Accounts			
430		Chart; Selected Transactions			
431	2012	Chart; Comparison of Receipts Reported on Foreign Agents Registration Act Filing to Receipts Reported in DMP International LLC Financial Records			
432	2013	Chart; Comparison of Receipts Reported on Foreign Agents Registration Act Filing to Receipts Reported in DMP International LLC and Smythson LLC Financial Records			
433	2014	Chart; Comparison of Receipts Reported on Foreign Agents Registration Act Filing to Receipts Reported in DMP International LLC Financial Records			
434		Chart; Money Laundering Transfers			
435		Chart; 2014 Summary of Unreported Income of DMP International LLC from Reclassification of Telmar Loan			
436		Chart; Summary of FARA Payments By Consultant			
437		Chart; Payments from Foreign Entities to Entities Performing Work in the United States			
438		Chart; False and Misleading Foreign Agents Registration Act Statements in Counts 4 and 5			
439		Chart; European Centre for a Modern Ukraine			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
440		Chart; Foreign Agents Registration Act History			
441		Chart; Government Relations Activity & Government Relations Activity: Paul Manafort			
442		Chart; Public Relations Activity			
443		Chart; Outreach to Congressman Rohrabacher			
444		Chart; Skadden Report			
445		Chart; Skadden Report: New York Times Outreach			
446		Chart; Visits to the United States			
500	6/2/2005	Memo; Re: Major Development in US Government Position on Ukraine Re-privatization			
501	7/6/2005	Memo; Subject: Evolution of US Policy to Ukraine			
502	5/24/2012	Press Release; Subject: Ministry of Justice Commissions Independent Review of the Yulia Tymoshenko Prosecution by International Experts			
503	6/25/2012	Memo; Subject: Going on Offense - Ukraine Action Plan for Europe and US			
504	6/27/2012	Memo; Filename: UKR SUPER VIP GROUP MEMO			
505	7/3/2012	Memo; Subject: Program to Conduct Briefings of Embassies, Media and NGOS			
506	7/10/2012	Memo; Ohkendovsky - US Visit			
507	7/15/2012	Document; Subject: Projects and Activities approved at the meeting between Klyuyev, Geller and Kaluzhny on July 12			
508	8/5/2012	Memo; Subject: State of PoR Campaign As Official Campaign Begins			
509	8/20/2012	Memo; SUBJECT: OSCE-ODIHR Priorities & Recommended Actions to Deal with These Priorities			
510	8/26/2012	Memo; Re: Meeting with Erol Olcok			
511	9/1/2012	Skadden Report			
512	9/27/2012	Memo; US EMBASSY PLAN			
513		[Exhibit Removed]			
514	10/1/2012	Memo; Subject: EI Program			
515	10/2/2012	Memo; Jonathan Hawker			
516	10/8/2012	Memo; Subject: State of Campaign - 3 Weeks to Election Day			
517	10/9/2012	Memo; Subject: Observer Group Strategy Team			
518	10/9/2012	Memo; Subject: Translation expenses			
519	10/15/2012	Memo; Subject: AP Q & A			
520	6/18/2005	Memo; Basel Presentation			
521	6/23/2005	Memo; Subject: Political, Lobbying and Legal Program for CIS			
522	6/25/2005	Memo; OVD memo			
523	8/10/2005	Memo; Subject: BVK Situation, DM Strategy			
524	1/3/2006	Memo; Subject: Messages for January Next Wave of Television and Radio Ads			
525	4/27/2006	Memo; Subject: Update - Overview by Country			
526	9/24/2008	Memo; Subject: Ambassador Taylor Meeting			
527	3/24/2009	Letter from Manafort to VFY			
528	4/20/2009	Memo; Subject: Cyprus			
529	4/20/2009	Memo; Subject: Cyprus			
530	1/31/2010	Memo; Subject: Final Week - Strategy, Tactics and Messages			
531	2/16/2010	Memo; Subject: Professional Team - Bonuses			
532	2/20/2010	Memo; Subject: Launch of Public Affairs Plan			
533	2/22/2010	Memo; RE: Wire Transfer Details for Personal Bonuses			
534	2009 - 2010	Invoices; Sensoryphile			
535	4/6/2010	Memo; Subject: SL Staff Meeting			
536	4/9/2010	Memo; Subject: Goals of US Trip			
537	6/1/2010	Email; Subject: Q and A for VY			
538	6/2/2010	Email; Subject: Press and Diplomatic Package			
539	6/18/2010	Memo; Subject: Update on Key Policy Initiatives and Elections Strategy			
540	6/30/2010	Email; Subject: Local election program			
541	8/10/2010	Email; Subject: First TV spot			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
542	10/4/2012	Email; Subject: brochures			
543	3/2/2011	Memo; Subject: Biden call today – News from Washington			
544	3/24/2011	Email; Subject: Transfers from Leviathan			
545	7/13/2011	Email; Subject: Thank you for digest			
546	7/17/2011	Email; Subject: FW: Re: On the roadmap			
547	7/21/2011	Email; Subject: Digital Roadmap			
548	7/29/2011	Email; Subject: О таблицах			
549	9/21/2011	Email; Subject: WSJ address			
550	10/11/2011	Memo; Subject: Consulting Payments			
551	10/16/2011	Email; Subject: FW: here is the two pager			
552	11/8/2011	Proposal; Signed SP&C Home Improvement Renovation Proposal for 174 Jobs Lane			
553	11/29/2011	Email; Subject: Payments			
554		[Exhibit Removed]			
555		[Exhibit Removed]			
556	2/16/2012	Proposal; Signed SP&C Home Improvement Renovation Proposal for 29 Howard St			
557	2/24/2012	Email; Subject: our message is getting across..please see this 3 minute item....important			
558	3/6/2012	Email; Subject: Questions you asked me to check			
559		[Exhibit Removed]			
560	3/7/2012	Email; Subject: meeting next week			
561	3/11/2012	Email; Subject: Re: my schedule & agenda			
562	3/22/2012	Email; Subject: Re: Canw e please touch base today?			
563	3/14/2012	Email; Subject: here you go			
564	3/16/2012	Email; Subject: срочная просьба			
565	4/5/2012	Email; Subject: President VFY			
566		[Exhibit Removed]			
567	4/10/2012	Email; Subject: VP and SL request			
568	4/11/2012	Email chain; Subject: Re: AC Update			
569	4/11/2012	Email; Subject: небольш просьба			
570	4/12/2012	Email chain; Subject: Fwd: FBC			
571	4/12/2012	Email; Subject: еще один док для СВ			
572	4/27/2012	Email; Subject: Enquiry			
573	4/29/2012	Email; Subject: пара страниц			
574	5/2/2012	Email; Subject: Fw: Euro 2012 Scripts			
575	5/3/2012	Email; Subject: Memo on Press conference			
576	5/8/2012	Email chain; Subject: Re: Antw.: US Consultants			
577		[Exhibit Removed]			
578	5/21/2012	Email chain; Subject: Re: Interviews in Washington			
579	5/23/2012	Email; Subject: Confidential			
580	5/24/2012	Email; Subject: On draft Senate resolution			
581	5/29/2012	Email; Subject: Your interview to Bloomberg			
582	6/4/2012	Email; Subject: ST documents			
583	6/6/2012	Email; Subject: On new addressee			
584	6/20/2012	Memo; Subject: Polling Special Project			
585	7/12/2012	Email; Subject: EI Outreach - International Plan			
586	7/13/2012	Email; Subject: Demidko documents - Party program			
587	7/14/2012	Email; Subject: testimonials, Accomplishments, schedule			
588	8/20/2012	Memo; SUBJECT: OSCE-ODIHR Priorities & Recommended Actions to Deal with These Priorities			
589	9/15/2012	Email; Subject: Lobby efforts			
590	9/23/2012	Email chain; Subject: Re: интервью			
591	9/22/2012	Email; Subject: FW: Statement on Durbin actions			
592	9/23/2012	Email; Subject: щас на русском пришло			
593	9/24/2012	Email; Subject: FW: the MFA statutenmen			
594	9/24/2012	Memo; Re: Our Current Washington Strategy and Post Elections Plan			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
595	9/28/2012	Memo; Re: Meeting in NYC with Aleksander Kwasnieski			
596	10/6/2012	Email; Subject: Memo on campaign Status			
597	10/14/2012	Email; Subject: EI MEMO			
598	10/27/2012	Email chain; Subject: Re: We dragged it out of them to enhance our opportunities			
599	12/11/2012	Email; Subject: Executive Summary			
600	8/25/2012	Memo; Re: Opportunities with New European Ambassadors			
601	1/11/2013	Document; Subject: US Consultants - Ina per AK Jan 11, 2013			
602	1/15/2013	VY Agenda			
603	1/24/2013	Email; Subject: Do not want to bother Paul			
604	2/4/2013	Memo; Subject: US Government Activity			
605		[Exhibit Removed]			
606	2/21/2013	Memo; Subject: Hapsburg - Update			
607	2/21/2013	Email Subject: Esche 1 dok			
608	3/1/2013	Proposal; SP&C Proposal for Whooping Hollow Road			
609	3/5/2013	Filename; VFY US activity report 3-1-2013 RUS.doc			
610	3/12/2013	Email; Subject: Проди			
611	3/16/2013	Email chain; Subject: Re: Washington Memo			
612	3/18/2013	Memo; Subject: Meeting with Under Secretary Wendy Sherman			
613	3/21/2013	Agenda; R. Gates Agenda			
614	4/5/2013	Memo; Subject: re PR Effort this week in Kyiv			
615	4/19/2013	Email chain; Subject: FW: IPR Strategic Communications Proposal			
616	4/22/2013	Memo; Subject: US Consultants – Quarterly Report			
617	4/25/2013	Memo; Subject: re Summary of Overdue Accounts			
618	5/15/2013	Memo; re May 17 Rallies			
619	5/17/2013	Email chain; Subject: Re: Draft			
620	5/17/2013	Email; Subject: Re: did you talk to SL about DFIAC?			
621	6/5/2013	Email; Subject: FW: AG Briefing Book			
622	6/5/2013	Email; Subject: Re: Meeting with former PM Gusenbauer re Ukraine/ change of venue			
623	6/21/2013	Email; Subject: Evrei			
624	6/26/2013	Email; Subject: Emailing: 130626 UKR SL memo on Durbin resolution .docx			
625	7/17/2013	Email; Subject: Re: pretty darn stupid			
626	7/17/2013	Email; Subject: Exclusive: How Ukraine Wooed Conservative Websites			
627	7/27/2013	Email; Subject: Re: doc for your edits			
628	7/28/2013	Email; Subject: Re: Talking points for SL			
629	7/29/2013	Calendar; Subject: IUNCH = PRESIDENT VFY			
630	9/20/2013	Email; Subject Yiakora			
631	9/25/2013	Calendar; Subject: Breakfast - VFY			
632	10/4/2013	Email; Subject: Re: Codel visit			
633	10/18/2013	Calendar; Subject: VFY			
634	11/18/2013	Email; Subject: небольшой документ			
635	12/21/2013	Calendar; Subject: Lunch. Pres VFY			
636	1/24/2014	Email; Subject: Re: Payments/Transfers			
637	2/4/2014	Calendar; Subject: President VFY			
638	3/19/2014	Email; Subject: Serangon Holdings Limited			
639	Sep. 2014	Ukraine OB Campaign Strategy Powerpoint			
640	4/22/2014	Bill of Materials; Big Picture Solutions			
641	4/28/2014	Invoice; Big Picture Solutions #INV-114006			
642	4/29/2014	Email; Subject: Re: Campaign TPs and Events			
643	5/2/2014	Email; Subject: Cyprus Companies			
644	5/24/2014	Email; Subject: Organization of Package of documents			
645	9/24/2014	OB Daily Talking Points			
646	10/7/2014	Memo; Subject: re OB Campaign Leaflets			
647	10/29/2014	Memo; Subject: Roadmap for November-December 2014			
648	12/13/2014	Email; Subject: con call this morning - around 800am			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
649	4/17/2015	Email; Subject: Tax - Extensions			
650	6/23/2015	Document; Peranova Loan Forgiveness Letter			
651	7/10/2015	Email; Subject: Re: Contract for 1			
652	8/25/2015	Email; Subject: RE: Contract for 1			
653	8/28/2015	Email; Subject: RE: FYI			
654	9/15/2015	Email; Subject: Re: Forms			
655	9/15/2015	Email; Subject: DMP Loan			
656	9/16/2015	Email; Subject: DMP International, LLC			
657	9/16/2015	Email; Subject: Re: Loan doc?			
658	9/23/2015	Email; Subject: Media Buy			
659		[Exhibit Removed]			
660		[Exhibit Removed]			
661		[Exhibit Removed]			
662	2/4/2016	Email; Subject: RE: DMP Int'l Income Question			
663	4/5/2016	Email; Subject: Re: DMP International Questions			
664		[Exhibit Removed]			
665	8/12/2016	Email; Subject: RE: Associated Press			
666		[Exhibit Removed]			
667	9/5/2016	Email Subject: Docs			
668	9/13/2016	Email; Subject: Re: Updates -DMP			
669	10/6/2016	Email; Subject: RE: up to date?			
670	10/7/2016	Email; Subject: Lola Partners, LLC and draft gift tax returns			
671	8/25/2016	Email; Subject: Re: Invoice			
672	2/27/2018	UFED Report			
673	2/27/2018	Email; Subject: Greetings from old friend			
674	2/27/2018	Email; Subject: Re: Strategic Communications Report for the Minister			
675	4/9/2010	Memo; Re: PrivateDinner – USG & International Institution Officials			
676	2012-2013	MC Brooklyn Holdings Ledger			
677	2012	KWC Tax Organizers for P. Manafort			
678		Proposal; SP&C Home Improvement Proposal for 174 Jobs Lane			
679		Photographs; Clothing with Alan Couture Labels			
680		Photographs; Clothing with House of Bijan Labels			
681		Photographs; House of Bijan Watch			
682		Documents; J&J Oriental Rug Gallery Documents			
683		Contacts; P. Manafort Contact List			
684		First Republic Bank Account XXXXXXXX6524 for DMP International			
685	3/24/2015	Email; Subject OB Contract 2015 FINAL FINAL			
686		Email; Subject: BVK Memo			
687	5/10/2005	Memo; Subject: First 100 Days of the Yushchenko Administration - Foundation for Lobbying Program			
688	3/29/2010	Email; Subject: VFY US Trip			
689	4/13/2010	Guest List; Dinner IHO President Victor Yanukovych			
690	2/1/2013	Document; RG TO DO			
691	2/24/2013	Memo; Subject: Hapsburg Activities Update and URGENT ACTION REQUEST			
692	2/26/2013	Memo; Subject: Portnov – US Visit			
693	3/2/2013	Document; [Untitled]			
694	3/16/2013	Memo; Subject: RP Trip to Washington			
695	3/23/2013	Memo; Subject: US Consultants Activity – Weekly Update			
696	4/7/2013	Memo; Subject: Hapsburg - April/May Plan			
697	4/21/2013	Memo; Subject: US Consultants Activity – Weekly Update			
698	4/25/2013	Memo; Subject: Communications Strategy on Intellectual Property Rights Issue			
699	4/25/2013	Memo; Subject: Summary of Accounts Overdue			
700	5/7/2013	Schedule; Sergei Kluyev			
701	5/8/2013	Schedule; Leonid Kozhara			
702	5/8/2013	Schedule; Sergei Kluyev			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
703	5/8/2013	Meeting Summaries; Sergei Kluyev			
704	5/13/2013	Meeting Summaries; Leonid Kozhara			
705	5/14/2013	Memo; Subject: Washington, DC Visits – Kozhara and Kluyev			
706	6/9/2013	Memo; AG Trip Report			
707	6/17/2013	Memo; Subject: Ledger Update			
708	7/10/2013	Memo; Subject: Hapsburg and US			
709		[Exhibit Removed]			
710	7/22/2014	Memo; Subject: Wire Payments			
711	3/11/2015	Email; Subject: FINAL			
712	4/25/2013	Document; Kyiv Agenda, Week of April 23			
713	none	Outline; PJM Presentation to Weekly Campaign Management Meeting			
714	4/14/2007	Memo; Subject: FARA Registration			
715	8/15/2016	Email; Subject: Re: First cut			
716	9/24/2012	Email; Subject: shit			
717	8/21/2012	Email; Subject: Gorshenyn			
718	5/9/2012	Email; Subject: RE: Contracts			
719	5/14/2013	Email; Subject: Fwd: VY Memo on LK/SK trip to DC			
720	6/26/2013	Memo; Subject: Durbin Resolution - S. 165			
721	6/7/2013	Email; Subject: Re: Next Klyuyev visit			
722	4/22/2013	Memo; Subject: US Consultants - Quarterly Report			
723		Memo; Subject: Translation expenses			
724	3/23/2013	Memo; Subject: US Consultants Activity - Weekly Update			
725	5/11/2015	Email; Subject: Updates			
726	12/20/2012	Memo; Subject: 2012 Taxes			
727	9/25/2015	Email; Subject: Update			
728		Agenda; Conf call RG Saturday December 11			
729		Agenda; Rick Agenda Business			
730		Gates - payments			
731		Actinet BOC Account Documents			
732		Actinet Hellenic Account Documents			
733		Black Sea BOC Account Documents			
734		Bletilla BOC Account Documents			
735		Bletilla Hellenic Account Documents			
736		Global Endeavour Loyal Bank Account Documents			
737		Gloval Highway BOC Account Documents			
738		Jeunet Loyal Bank Account Documents			
739		Leviathan BOC Account Documents			
740		LOAV BOC Account Documents			
741		Lucicle BOC Account Documents			
742		Lucicle Hellenic Statements			
743		Marziola Hellenic and BOC Account Documents			
744		Olivenia Hellenic and BOCC Account Documents			
745		Peranova BOC Account Documents			
746		Serangon BOC Account Documents			
747		Yiakora BOC Account Documents			
800		Certificates of Authenticity			
801		Photograph; 1046 N Edgewood Street, Arlington, VA			
802		Photograph; 29 Howard Street, New York, NY			
803		Photograph; 377 Union Street, Brooklyn, NY			
804		Photograph; 601 N Fairfax Street, Alexandria, VA			
805		Photograph; 174 Jobs Lane, Bridgehampton, NY			
806		[Intentially Left Blank]			
807	9/13/2013	Email; Subject: FW Paul's tax return questions - including 3rd qtr est - due 9/16			
808	4/11/2012	Email; Subject: небольшой просьба			
809	4/18/2011	Email; Subject: 2010 Extension			
810	4/14/2012	Email; Subject: Mirror Cube Films			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
811	12/14/2012	Email; Subject: Tax planning and year end issues			
812	3/19/2013	Email; Subject: Ameriprise Statement of income 2012			
813	9/10/2014	Email; Subject: Summary of Call Today			
814	6/1/2015	Email; Subject: LiRED			
815	4/30/2012	Email; Subject: May Payments			
816	9/26/2012	Email; Subject: Payments			
817	11/27/2012	Email; Subject: Payments			
818	10/15/2012	Monday Agenda - Oct 15, 2012			
819		P. Manafort Flight Manifests			
820	12/24/2014	Email; Subject: Re: Wire Today			
821	4/2/2014	Email; Subject: JAM MOVE & BABY ROUGH PLAN			
822	4/14/2014	Email; Subject: List of furniture to move			
823	8/16/2016	Email; Subject: 2016 DMP P&L			
824	3/31/2015	Email; Subject: DMP International - Open Items			
825	9/14/2016	Email; Subject: Daisy			
826	1/7/2015	Email; Subject Paul Manafort 11 E. 29th Street Rent			
827	5/9/2012	Email; Subject: Results of Tymo Hospital Transfer News Story			
828	6/25/2012	Email; Subject: Analysis of EPP and PACE resolutions - Creating the Fall Offensive			
829	9/19/2012	Email; Subject: Re: an urgent request ON IT			
830	9/22/2012	Email; Subject: Fw: promised docs			
831	9/25/2012	Email; Subject: Re Final Coverage Report of Vienna Conference			
832	9/25/2012	Email; Subject: Libel bill			
833	9/28/2012	Email; Subject: Fw: eyes only			
834	10/9/2012	Email; Subject: Re: Collection of documents to use to Promote Election Credibility and Fairness			
835	10/15/2012	Email; Subject: Fw: Op Ed			
836	10/20/2012	Email; Subject: PR Doc			
837	10/24/2012	Email; Subject: Re: OP ED - Response to Clinton ashton			
838	10/24/2012	Email; Subject: Re: Hillary Sides...			
839	10/25/2012	Email; Subject: Re: Foreign Minister quotes for Wash Times URGENT			
840	10/26/2012	Subject: Re: New Goal on Anti Semite stuff			
841	10/28/2012	Subject: FW: Israeli MFA Statement			
842	10/30/2012	Subject: Re: New York Times Op - ed: Draft 1			
843	12/11/2012	Subject: Contact List and Talking Points			
844	2/26/2013	Subject: Fw: AK Update			
845	3/6/2013	Subject: Re: Vlasenko matter - Final docs and Plan for Today			
846	4/5/2013	Subject: Fwd: Washington Post			
847	4/8/2013	Subject: Re: Statement by NSC Spokesperson Caitlin Hayden on Ukraine			
848	4/24/2013	Email; Subject: Re: Interfax update - OSCE PA supports signing of EU-Ukraine Association Agreement			
849	4/28/2013	Subject: Lunch confirmed and attached is revised draft dissem as requested with names black and more CPC			
850	5/5/2013	Subject: Re: 830 am breakfast on May 8 with Alfred in CONFIRMED			
851	5/16/2013	Subject: FW: Tymo latest news - May 15			
852	5/17/2013	Subject: DC Notes			
853	5/17/2013	Subject: as requested for PJM			
854	6/14/2013	Email; Subject: FW: Smith - Article			
855	6/14/2013	Email; Subject: Re: Fule confident that the AA with Ukraine will get signed at the Vilnius summit			
856	7/2/2013	Subject: FW: Yanukovych, presidents of Visegrad Four to meet in Wisla on July 2-3, says Komorowski's press service			
857	7/14/2013	Subject: Re: Fule confident that the AA with Ukraine will get signed at the Vilnius summit			
858	8/16/2013	Subject: Re: Media Strategy for September			
859	8/21/2013	Email; Subject: Re: Chicago TPs			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
860	9/6/2013	Email; Subject: [FWD: FW: Ukraine's Supreme Court not to consider Tymoschenko's appeal against her sentence in 'gas case']			
861	9/9/2013	Email; Subject: Re: Media Strategy for September - THEME to build on in Europe, US, & Ukr			
862	9/18/2013	Email; Subject: Fwd: Exxon			
863	10/2/2013	Email; Subject: FW: Popesku: PACE deputies hail reforms in Ukraine on road to signing Association Agreement with EU			
864	10/10/2013	Email; Subject: FWD: EP Foreign Affairs Committee approved AA with Ukraine			
865	11/5/2013	Email; Subject: Re: CONFIDENTIAL [FWD: FW: Government signs deal with Chevron Corp. to develop shale gas in western Ukraine]			
866	11/6/2013	Email; Subject: FW: Government signs deal with Chevron Corp. to develop shale gas in western Ukraine			
867	11/12/2013	Email; Subject: Re: Raising the stakes of a Russian strangulation of Ukraine's economy			
868	12/16/2013	Email; Subject: Re: PACE and SMD elections			
869	12/29/2013	Email; Subject: FW: Rada released EuroMaiden protesters			
900	4/16/1981	Form; Short Form Registration #3226 Paul Manafort			
901	9/30/1982	Form; Short Form Registration #3415 Paul Manafort			
902	10/5/1982	Form; Registration No. 3415 Black, Manafort & Stone, Inc.			
903	6/1/1984	Section 5 Inspection file, Registration #3600, Black, Manafort and Stone Public Affairs			
904	6/1/1984	Amendment to FARA Registration Statement; Paul Manafort Reg. #3594			
905	6/14/1984	Registration No. 3600 Black, Manafort and Stone Public Affairs, Inc.			
906	2/8/1985	Letter; Subject: Registration No. 3600			
907	5/6/1985	Form; Short Form Registration #3600 Paul Manafort			
908	1/30/1986	Form; Registration No. 3710 Black, Manafort, Stone & Atwater			
909	3/11/1986	Form; Short Form Registration #3600 Paul Manafort			
910	7/1/1986	Section 5 Inspection file, Registration # 3600 Black, Manafort, Stone and Kelly Public Affairs Company			
911	7/1/1986	Section 5 Inspection file, Registration # 3594, Paul J. Manafort			
912	7/1/1986	Section 5 Inspection file, Registration # 3415, Black, Manafort, Stone and Atwater			
913	7/1/1986	Section 5 Inspection file, Registration # 3710, Black, Manafort, Stone and Atwater			
914	12/22/1987	Letter; [No Subject] to James Rocap			
915	4/16/1997	Form; Registration #5173 Paul Manafort			
916	3/2/1998	Form; Short Form Registration #5240 Paul Manafort			
917	9/13/2016	Letter; Subject: Re: Possible Obligation to Register Pursuant to the Foreign Agents Registration Act			
918	9/13/2016	Letter; Subject: Re: Possible Obligation to Register Pursuant to the Foreign Agents Registration Act (FL)			
919	9/13/2016	Letter; Subject: Re: Possible Obligation to Register Pursuant to the Foreign Agents Registration Act (VA)			
920	9/13/2016	Letter; Subject: Re: Paul J. Manafort, Jr. and DMP International, LLC - Possible Obligation to Register Pursuant to the Foreign Agents Registration Act			
921		[Exhibit Removed]			
922		[Exhibit Removed]			
923		[Exhibit Removed]			
924		[Exhibit Removed]			
925		[Exhibit Removed]			
926	6/27/2017	FARA Registration; DMP International, LLC (#6440)			
927	7/18/2018	Certificate of Authenticity; DMP International FARA Filing			
928		[Exhibit Removed]			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
929	11/23/2016; 2/10/17	Certified Letters: (1) Subject: Re: September 13, 2016 Letters to DMP International, LLC; Paul J. Manafort, Jr.; and Richard W. Gates; and (2) Subject: Re: Letters to DMP International, LLC; Paul J. Manafort, Jr.; and Richard W. Gates			
930	10/18/2016	Letter; Subject: Re: Inquiry Regarding Possible Obligation to Register Pursuant to the Foreign Agents Registration Act			
931	1/30/2008	Short-Form Registration Statement Pursuant to the Foreign Agents Registration Act of 1938; Christopher Deri			
932	4/22/2008	Short-Form Registration Statement Pursuant to the Foreign Agents Registration Act of 1938; Christopher Deri			
933	7/25/2008	Amendment to Registration Statement Pursuant to the Foreign Agents Registration Act of 1938; Daniel J. Edelman, Inc.			
934	7/25/2008	Exhibits A and B to Registration Statement; Daniel J. Edelman, Inc.			
935	1/21/1987	Letter; Subject: Registration No. 3600, 3415, and 3710			
936	5/29/1987	Letter; Subject: Paul J. Manafort Registration No. 3594			
937	10/23/1986	Inspection Report Summary Registration #3710			
938	12/3/1986	Inspection Report Summary Registration #3415			
939	12/3/1986	Inspection Report Summary			
940	5/14/1987	Inspection Report Summary Registration #3594			
941	6/1/1984	FARA Registration Statement; Paul Manafort Reg. #3594			
942	6/1/1984	FARA Registration Short Form; Paul Manafort Reg. #3594			
943	1/4/1985	FARA Registration Supplemental Statement; Paul Manafort Reg. #3594			
944	2/19/1985	Amendment to FARA Registration Statement; Paul Manafort Reg. #3594			
945	7/3/1985	FARA Registration Supplemental Statement Reg. #3594			
946	1/3/1986	FARA Registration Supplemental Statement Reg. #3594			
947	3/3/1985	Amendment to FARA Registration Statement; Paul Manafort Reg. #3594			
948	3/11/1985	FARA Registration Short Form; Paul Manafort Reg. #3594			
949	6/27/1986	Amendment to FARA Registration Statement; Paul Manafort; #3594			
950	7/7/1986	FARA Registration Supplemental Statement; Paul Manafort; #3594			
951	1/6/1987	FARA Registration Supplemental Statement; Paul Manafort; #3594			
952	9/25/1987	Amendment to FARA Registration Form; Paul Manafort; #3594; for 6/4/86			
953	9/25/1987	Amendment to Registration Form; Paul Manafort; #3594; for 12/4/85			
954	9/25/1987	Amendment to Registration Form; Paul Manafort; #3594; for 6/4/85			
1000	11/7/2016 - 8/11/2017	Billing records Akin Gump			
1001		[Exhibit Removed]			
1002		[Exhibit Removed]			
1003		[Exhibit Removed]			
1004		[Exhibit Removed]			
1005		[Exhibit Removed]			
1006		[Exhibit Removed]			
1007		[Exhibit Removed]			
1008		[Exhibit Removed]			
1009		[Exhibit Removed]			
1010		[Exhibit Removed]			
1011		[Exhibit Removed]			
1012		[Exhibit Removed]			
1013		[Exhibit Removed]			
1014		[Exhibit Removed]			
1015		[Exhibit Removed]			
1016		[Exhibit Removed]			
1017	5/11/2007	Email; Subject: Ukraine Proposal			
1018	5/31/2007	Email; Subject: WSJ story on Yanukovich			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1019	5/31/2007	Email; Subject: FW: SOW			
1020	6/6/2007	Email; Subject: RE: Speak this Week			
1021	6/6/2007	Email; Subject: Four Month Communication Workplan - Draft 6-6-07 (am)			
1022	6/6/2007	Email; Subject: Master Narrative v1			
1023	6/7/2007	Email; Subject: RE: FYI			
1024	6/7/2007	Memo; Subject: Re: Proposed Issue Platforms			
1025	6/8/2007	Email; Subject: Ukraine 6/6 mtg notes			
1026	6/9/2007	Email; Subject: FW: EU Report			
1027	6/14/2007	Email; Subject: Ukraine Meeting Notes			
1028	1/30/2008	Exhibits A and B to FARA Registration; Daniel J. Edelman, Inc.			
1029	6/15/2011	Email; Subject: Re: STRASBOURG FBC strategy and deliverables, god faith basis, and meeting June 21st			
1030	6/7/2011	Email; Subject: RE: Strasbourg Planning			
1031	6/16/2011	Email; Subject: Re: STRASBOURG FBC strategy and deliverables, god faith basis, and meeting June 21st			
1032	6/26/2011	Email; Subject: Fwd: Conf Call			
1033	6/30/2011	Email; Subject: RE: from Sergiy Lovochkin			
1034	7/1/2011	Email; Subject: Fw: FBC Proposal Version 2 - Comments			
1035	7/1/2011	Email; Subject: Ukraine contract			
1036	7/8/2011	CONTRACT FOR THE PROVISION OF A STRATEGIC COMMUNICATIONS CAMPAIGN FOR 8 JULY 2011 - 7 JANUARY 2011 BETWEEN NAATHAN CONSULTING (BVI) LTD [...] AND HADRIA VENTURES LTD			
1037	7/10/2011	Email; Subject: Fwd: soft copy with same password			
1038	7/10/2011	Email; Subject: Fwd: New e-mail			
1039	7/11/2011	Email; Subject: RE: Follow up			
1040	7/16/2011	Email; Subject: Re: On the roadmap			
1041	7/17/2011	Email; Subject: Re: Have now check and ascertained that Oleg asked my team to send materials to him.			
1042	7/17/2011	Email; Subject: Re: We have a problem			
1043	7/17/2011	Email; Subject: Fwd: Ukraine Media Coverage			
1044	7/17/2011	Email; Subject: Re: We have a problem			
1045		[Exhibit Removed]			
1046	7/20/2011	Email; Subject: RE: An open letter to Yanukovych: Mr. President, time to stop digging yourself into a hole			
1047	7/21/2011	Email; Subject: contract			
1048	7/21/2011	Email; Subject: Fwd: contract			
1049	7/23/2011	Email; Subject: Re: Blogosphere			
1050	7/25/2011	Email; Subject: [unknown]; Attachments: UKR Indep Day Memo 220711FINAL.docx			
1051	7/25/2011	Email; Subject: Action Items from Conf Call July 25			
1052	7/25/2011	Email; Subject: Re: Ukraine blog live			
1053	7/27/2011	Email; Subject: FW: IRI tells US Congress freedom in Ukraine Odeteriorating1 under Yanukovych			
1054	7/29/2011	Email; Subject: FW: International criticism of Tymoshenko trial grows as TV coverage ends			
1055	7/29/2011	Email; Subject: Fwd: European all-or-nothing game of Yulia Tymoshenko			
1056	8/1/2011	Email chain; Subject: Fw: Agenda - Conf Call 8-2-11			
1057	8/3/2011	Email; Subject: FW: Why Do EU Countries' Ratings Deteriorate and Ukraine's ... Improve?			
1058	8/5/2011	Email; Subject: RE: Storyline			
1059	8/10/2011	Email; Subject: Re: Ukraine meeting today			
1060	8/12/2011	Email; Subject: Re: OpEd Draft			
1061	8/13/2011	Email; Subject: Re: revised op-ed			
1062	8/15/2011	Email; Subject: Re: revised op-ed and weekly call - ACTION ITEMS			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1063	8/16/2011	Email; Subject: Re: op-ed and press release			
1064	8/19/2011	Email; Subject: Re: Op ed status			
1065	8/24/2011	Email; Subject: Re: WSJ op-ed			
1066	9/11/2011	Email; Subject: Re: Interview			
1067	9/11/2011	Email; Subject: Re: Independence Day Coverage Report			
1068	8/24/2011	Email; Subject: Re: FINAL op-ed			
1069	8/26/2011	Email; Subject: Re: Weekly Ukraine Call			
1070	9/6/2011	Email; Subject: RE: Ukraine Call - Action Items			
1071	9/7/2011	Email; Subject: RE: WSJ/FT Interview			
1072	9/9/2011	Email; Subject: Re: Heritage KG lunch			
1073	9/19/2011	Email; Subject: Re: NY Media and draft op-ed			
1074	9/20/2011	Email; Subject: Re: WSJ ed board			
1075	10/12/2011	Email; Subject: Re: Interview Opportunity - several publications			
1076	10/19/2011	Email; Subject: Re: Interview with Azarov			
1077	10/25/2011	Email; Subject: Fwd: report of activities			
1078	11/20/2011	Email; Subject: For your eyes only			
1079	11/29/2011	Email; Subject: [unknown]			
1080	12/15/2011	Email; Subject: Confidential memo, same password			
1081	12/17/2011	Email; Subject: Fw: Bloomberg and Wall Street Journal Dec 19th or later in the week FEEDBACK APPRECIATED			
1082	12/23/2011	Email; Subject: We are very pleased to share with you our latest article on Ukraine and the AA, by a "friend" in Washington			
1083	1/11/2012	Email; Subject: Re: Ukraine's foreign minister interview for Dow Jones/Wall Street Journal - JANUARY 2012			
1084	1/14/2012	Email; Subject: Down to 3 pages plus timeline please review			
1085	1/26/2012	Email; Subject: Re: Fw: Fwd: On freedom of press index			
1086	1/27/2012	Email; Subject: More than 100 pick ups in dissemination of press freedom rankings story			
1087	2/1/2012	Consultancy Agreement dated February 1, 2012, between Goldwing Investment PTE LTD and P.O.V. Media LTD			
1088	2/3/2012	Email; Subject: Fw: Agenda for next Monday's call for PM			
1089	2/15/2012	Email; Subject: not yet published			
1090	3/6/2012	Email; Subject: Episodes IMPORTANT			
1091		[Exhibit Removed]			
1092	3/13/2012	Email; Subject: Re: Updates			
1093	3/27/2012	Email; Subject: Strategic COmmunications Report for the Minister			
1094	4/16/2012	Email; Subject: Re: as requested			
1095		[Exhibit Removed]			
1096	4/17/2012	Email; Subject: slip up on cxssr			
1097	5/7/2012	Email; Subject: Re: can we coordinate when paul is going to be in kyiv next week			
1098	5/9/2012	Email; Subject: Could you help with two rooms for may 15?			
1099	5/17/2012	Email; Subject: US visit			
1100	5/29/2012	Email; Subject: Re: the other thing that i know you are handling			
1101	6/10/2012	Memo; Subject: Revised Network Idea for 2012 Involving Third-Party Champions on Ukraine Electoral and Economic Reforms			
1102	6/13/2012	Email; Subject: Re: Summary Report			
1103	6/20/2012	Email; Subject: Monthly Activity Report			
1104	6/22/2012	Email; Subject: Re: Ukraine's OSCE Chairmanship news story - Dissemination Results			
1105	6/27/2012	Email; Subject: Kissinger endorses Ukraine's EU membership news story - Dissemination Results			
1106	7/10/2012	Email; Subject: Khoroshkovskiy US Trip			
1107	7/11/2012	Email; Subject: Re: Summary of Skype With Vasyl and Olena, and action plan			
1108	7/12/2012	Email; Subject: Fw: VK's draft op ed			
1109	7/12/2012	Email; Subject: Fw: VK's draft op ed			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1110	7/12/2012	Email; Subject: op ed outline for karan			
1111	7/17/2012	Email; Subject: VK interviews			
1112	7/17/2012	Email; Subject: Re: Contributors for CXSSR			
1113	7/17/2012	Email; Subject: Op ed for us to place in USA for VK			
1114	7/20/2012	Email; Subject: Re: FW: Op ed for us to place in USA for VK			
1115	7/20/2012	Email; Subject: VK article for placement			
1116	7/25/2012	Email; Subject: Re: Op Ed for us to place in USA for VK			
1117	7/27/2012	Email; Subject: Hand-Over List			
1118	7/27/2012	Email; Subject: Re: VK Washington press			
1119	7/27/2012	Email; Subject: Re: Kindly advise when you send VK info			
1120	7/27/2012	Email; Subject: Re: What's on Weekly Report			
1121	7/27/2012	Email; Subject: Re: Op Ed for us to place in USA for VK			
1122	7/29/2012	Email; Subject: July 31 op ed and interview			
1123	7/29/2012	Email; Subject: Re: Contact person			
1124	7/30/2012	Email; Subject: Re: op ed			
1125	7/30/2012	Email; Subject: Re: op ed and interviews, dc 31 july			
1126	7/30/2012	Email; Subject: Even better			
1127	7/30/2012	Email; Subject: Re: it is nearly 3 am and I need to sleep 3 hours			
1128	7/30/2012	Email; Subject: OpEd			
1129	7/30/2012	Email; Subject: rick, very terse			
1130	7/30/2012	Email; Subject; Re: op ed and interviews, dc 31 july			
1131	7/31/2012	Email; Subject: Re: Op ed and interviews			
1132	7/31/2012	Email; Subject: Re: VK - Updates			
1133	7/31/2012	Email; Subject: OpEd			
1134	7/31/2012	Email; Subject: Re: OP ED, Interview schedule, Addresses, CONTACT details			
1135		[Exhibit Removed]			
1136	7/31/2012	Schedule; Media Interviews - Schedule			
1137	7/31/2012	Email; Subject: Fw: Op ed and interviews			
1138		[Exhibit Removed]			
1139	8/1/2012	Email; Subject: Re: fyi			
1140	8/3/2012	Email; Subject: Tymoshenko Portal news story - first results of the dissemination			
1141	8/3/2012	Email; Subject: Re:			
1142	8/5/2012	Email; Subject: Habsburg Empire			
1143	8/6/2012	Email; Subject: Hndover agf to do giornalino, chapters, thank bulent, aug 27 speak to ilaria, sept 2 prvt jet, rick for contracts, alfred for bank acct, chrc on chsllisn payments monday or tuesday with gt, inform bank and send funds to uk and to lucca and to bergamo			
1144	8/7/2012	Email; Subject: for your eyes only			
1145	8/8/2012	Email; Subject: Fwd: per Paul's request			
1146	8/10/2012	Email; Subject: Re: RG account			
1147	8/13/2012	Marziola/Gusenbauer Consultancy Agreement			
1148	8/13/2012	Email; Subject: please read and reply with word doc encrypted			
1149	8/21/2012	Email; Subject: URGENT ALFRED TO ALAN			
1150	8/22/2012	Email; Subject: Fw: About New York			
1151	8/22/2012	Email; Subject: WG: Contract			
1152	8/22/2012	Email; Subject: Re: About New York			
1153	8/23/2012	Email; Subject: we need to do a one pager on Urso			
1154	8/23/2012	Email; Subject: Re: Daughter of Pavlor Movchan from Tymo party has contacted us			
1155	8/28/2012	Email; Subject: In Addition			
1156	8/31/2012	Email; Subject: Re: EO payment			
1157	9/1/2012	Email; Subject: Alfred			
1158	9/5/2012	Email; Subject: CXSSR			
1159	9/5/2012	Email; Subject: Re: Big Opportunity: EU Probe of Gazprom Will Show Why Ukraine Suffers From Tymo's 2009 Crime			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1160	9/5/2012	Email; Subject: Re: schulz is asking Sasha for written report for EP by oct 2nd			
1161	9/5/2012	Email; Subject: schulz is asking Sasha for written report for EP by oct 2nd			
1162	9/5/2012	Email; Subject: Re: schulz is asking Sasha for written report for EP by oct 2nd			
1163	9/7/2012	Email; Subject: Fw: WG: urgent			
1164	9/7/2012	Email; Subject: Attached			
1165	9/16/2012	Email; Subject: Re: Paris is already 90% confirmed for Nov 12th at very prestigious institute!			
1166	9/17/2012	Email; Subject: Re: KiG Vienna interviews, Inna site, and beyond...			
1167	9/17/2012	Email; Subject: Re: KiG Vienna interviews, Inna site, and beyond...			
1168	9/17/2012	Email; Subject: RE: Eck and me to talk to charles and GT about implementing below			
1169	9/17/2012	Email; Subject: Re: Fw: very urgent			
1170	9/18/2012	Email; Subject: Re: Contact details			
1171	9/18/2012	Email; Subject: Contact details			
1172	9/19/2012	Email; Subject: Fwd: an urgent request			
1173	9/19/2012	Email; Subject: i have been told that Sasha			
1174	9/19/2012	Email; Subject: am working on USA matter			
1175	9/19/2012	Email; Subject: i have been told AK already spoke to the Senator			
1176	9/19/2012	Email; Subject: Re: eckart says resolution already was voted?			
1177		[Exhibit Removed]			
1178	9/28/2012	Email; Subject: RICK GATES on Conference call today			
1179	9/29/2012	Email; Subject: Re: Dial-in and Contact Info			
1180	9/29/2012	Email; Subject: Re: Dial-in and Contact Info			
1181	9/29/2012	Email; Subject: Re: weekend plan			
1182	9/30/2012	Email; Subject: please review this and call me			
1183	9/30/2012	Email; Subject: Re: weekend plan			
1184	9/30/2012	Email; Subject: invoice			
1185	9/30/2012	Email; Subject: Fw: nice copy			
1186	10/1/2012	Email; Subject: Re: news story for dissemination monday morning at 9 am London time..but check with Eckart first			
1187	10/3/2012	Email; Subject: Re: Tymoshenko party supports crack down on gays?			
1188	10/3/2012	Email; Subject: ALARM			
1189	10/3/2012	Email; Subject: Re: ALARM			
1190	10/8/2012	Email; Subject: Activity Report			
1191	10/9/2012	Email; Subject: Re: Change of date to October 23rd			
1192	10/9/2012	Email; Subject: please review this evening			
1193	10/9/2012	Email; Subject: Re: please review this evening			
1194	10/10/2012	Email; Subject: Kk			
1195	10/10/2012	Email; Subject: Re: On Urso			
1196	10/12/2012	Email; Subject: Kwas op-ed for WSJ			
1197	10/12/2012	Email; Subject: Re: EOM Report			
1198	10/13/2012	Email; Subject: Media Monitoring			
1199	10/13/2012	Email; Subject: Paris and London			
1200	10/13/2012	Email; Subject: Media Monitoring - final input from KK			
1201	10/14/2012	Email; Subject: Alan priorities Sunday Monday			
1202	10/15/2012	Email; Subject: Your approval requested soonets			
1203	10/17/2012	Email; Subject: Non eu company needed for habsburg contract			
1204	10/17/2012	Email; Subject: RE: Yuschenko of interest?			
1205	10/18/2012	Email; Subject: Astonished			
1206	10/18/2012	Email; Subject: op ed			
1207	10/18/2012	Email; Subject: Re: We need to talk			
1208	10/19/2012	Email; Subject: Re: News			
1209	10/20/2012	Email; Subject: Re: weekly report			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1210	10/20/2012	Email; Subject: ukraine media			
1211	10/23/2012	Email; Subject: Re: Prodi op ed			
1212	10/23/2012	Email; Subject: nouvelle versione			
1213	10/24/2012	Email; Subject: RE: Final Dissemination			
1214	10/24/2012	Email; Subject: FW: INVOICE FOR MR ALAN FRIEDMAN			
1215	10/24/2012	Email; Subject: Re: We urgently need non EU company contract for Alfred's company, then you committed to			
1216	10/26/2012	Email; Subject: Re: Bon de commande bannière RDN			
1217	10/27/2012	Email; Subject: Re: op ed and media			
1218	10/28/2012	Email; Subject: you never saw this			
1219	10/28/2012	Email; Subject: Re: journalist email lists when you have time			
1220	10/28/2012	Email; Subject: Here you go			
1221	10/29/2012	Email; Subject: Re: Bon de commande bannière RDN			
1222	11/1/2012	Email; Subject: long talk with rick			
1223	11/2/2012	Email; Subject: Fw: our latest news dissemination just out on CNBC			
1224	11/2/2012	Email; Subject: Re: Fw: Fw: first publications			
1225	11/2/2012	Email; Subject: We need to be careful			
1226	11/5/2012	Email; Subject: Re: Alfred contract needed			
1227	11/7/2012	Email; Subject: Contract			
1228	11/7/2012	Email; Subject: Re: Clinton Queries our release			
1229	11/8/2012	Email; Subject: FW: Conference on Ukraine in Paris			
1230	11/9/2012	Email; Subject: Fwd: Helsinki Commission staff meeting			
1231	11/11/2012	Email; Subject: we should skype Tuesday			
1232	11/13/2012	Email; Subject: for discussion...the solution is to insert this into the contract			
1233	11/13/2012	Email; Subject: Final agreed contract, with VAT and SUBCONTRACTING BAN removed			
1234	11/14/2012	Email; Subject: Re: Alfred Expenses			
1235	11/14/2012	Email; Subject: Re: i will be with my lawyers and bank advisers tomorrow			
1236		[Exhibit Removed]			
1237	11/14/2012	Email; Subject: Contract			
1238	11/15/2012	Email; Subject: Re: Are you aware of this?			
1239		[Exhibit Removed]			
1240	11/19/2012	Email; Subject: Re: invoices expenses giannotti			
1241	11/20/2012	Email; Subject: Re: AW: WG: Contract			
1242	11/20/2012	Email; Subject: Re: PJM Memo			
1243	11/29/2012	Email; Subject: Re: Important			
1244	12/5/2012	Email; Subject: Re: CDS Reporter			
1245	12/7/2012	Email; Subject: R. Monti - assignment			
1246	12/8/2012	Email; Subject: Re: can cxxsr and red state hold a conference in DC on Ukraine at The Crossroads			
1247	12/11/2012	Email; Subject: Skadden Info			
1248	12/11/2012	Email; Subject: ANSA			
1249	12/11/2012	Email; Subject: report			
1250	12/12/2012	Email; Subject: Re: Report			
1251	12/12/2012	Email; Subject: Re: Warsaw			
1252	12/13/2012	Email; Subject: Re: Tymo Coverage Reports			
1253	12/16/2012	Email; Subject: Fw: U.S. lawyers from Skadden would sentence Tymoshenko for a longer period than Kireyev. BYT lost world press			
1254	1/9/2013	Email; Subject: Re: how is this as a start?			
1255		[Exhibit Removed]			
1256	1/10/2013	Email; Subject: Re: confidential rick			
1257	1/16/2013	Email; Subject: RE: Briefing			
1258	2/20/2013	Email; Subject: Habsburg Activity Report			
1259	2/23/2013	Email; Subject: Re: talked to rick			
1260	2/27/2013	Email; Subject: AK Important This Morning			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1261	3/1/2013	Email; Subject: Re: Trip to the US			
1262	3/3/2013	Email; Subject: RP Letter			
1263	3/4/2013	Email; Subject: Re: RP Letter			
1264	3/4/2013	Email; Subject: [NO SUBJECT LINE]			
1265	3/4/2013	Email; Subject: Re: Letter from AK			
1266	3/4/2013	Email; Subject: RP Letter			
1267	3/4/2013	Email; Subject: Letter			
1268	3/5/2013	Email; Subject: Prodi in Washington			
1269	3/5/2013	Email; Subject: Re: Prodi in Washington			
1270	3/5/2013	Email; Subject: Washington dates			
1271	3/5/2013	Email; Subject: Re: RP			
1272	3/5/2013	Email; Subject: Pres. Prodi			
1273	3/7/2013	Email; Subject: RP Letter			
1274		[Exhibit Removed]			
1275	3/13/2013	Email; Subject: Great First Day			
1276	3/22/2013	Email; Subject: Msg from PM to Sasha			
1277	3/26/2013	Email; Subject: RE: U Deliverable Report			
1278	5/20/2013	Email; Subject: i am thinking we offer PJM a slot for aperson			
1279	1/29/2014	Email; Subject: Re: Items			
1280	2/3/2014	Email; Subject: Re: Revised OpEd			
1281	2/3/2014	Email; Subject: Re: RP contact			
1282	2/3/2014	Email; Subject: Oped - REVISED			
1283	2/4/2014	Email; Subject: Re: Items			
1284	2/4/2014	Email; Subject: FW: Oped - REVISED			
1285	2/4/2014	Email; Subject: Fwd: Oped - REVISED			
1286	2/4/2014	Email; Subject: Fwd: Op ed for RP			
1287	2/5/2014	Email; Subject: Re: Oped - REVISED			
1288	2/7/2014	Email; Subject: Re: Oped			
1289	2/18/2014	Email; Subject: NYT			
1290	2/18/2014	Email; Subject: Oped			
1291	2/20/2014	Email; Subject: NYT Oped - RP			
1292	4/1/2014	Email; Subject: Re: Speech			
1293	4/1/2014	Email; Subject: Re-worked Speech			
1294	4/7/2014	Email; Subject: Fwd: Chance to renew the Party of Regions is lost - Serhiy Tigipko			
1295		[Exhibit Removed]			
1296	5/27/2014	Email; Subject: Ukraine's Richest Man Takes Aim at Pro-Russian Separatists, Calls for Unity - 327 News Dissemination Results			
1297		[Exhibit Removed]			
1298	1/12/2015	Email; Subject: FW: I had a nice chat last week with PJM			
1299	2/3/2015	Email; Subject: Re: would be nice to catch up on Tuesday			
1300	11/12/2016	Email; Subject: [FWD: Congratulations from Alan Friedman Request to be first EUROPEAN NEWSPAPER INTERVIEW WITH MR TRUMP]			
1301	2/24/2018	Screenshots; Text Messages			
1302	03/16/2014 - 04/27/2018	Spreadsheet; Messages/Call Log			
1303	2/27/2018	Email; Subject: Greetings from KYIV			
1304	4/4/2018	Text Message			
1305		[Exhibit Removed]			
1306		[Exhibit Removed]			
1307	8/1/2012	Memo; Subject: SA Report - Media Plan			
1308	9/19/2012	Email; Subject: Re: an urgent request ON IT			
1309	10/23/2012	Email; Subject: FW: Update media work - Berlin Conf			
1310	2/19/2013	Email; Subject: Washington			
1311	2/20/2013	Email; Subject: Wash Trip			
1312	2/20/2013	Email; Subject: Re: U story for CXSSR			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1313	2/20/2013	Email; Subject: Fw: Updates			
1314	2/21/2013	Email; Subject: new article on CXXSR on Ukraine			
1315	2/22/2013	Email; Subject: what we sent paul after i spoke to sasha			
1316	2/23/2013	Email; Subject: Fw: echo chamber			
1317	2/23/2013	Email; Subject: highly unter 4 augen oder 6 jetzt			
1318	2/25/2013	Email; Subject: this is an alternative version as well, a bit more American			
1319	2/26/2013	Email; Subject: Re: McCain			
1320	2/27/2013	Email; Subject: Re: AK Question			
1321	2/27/2013	Email; Subject: AK			
1322	2/28/2013	Email; Subject: AK			
1323	3/1/2013	Email; Subject: Re: Draft Op Ed for Hill VERSION 2			
1324	3/1/2013	Email; Subject: Re: DC Updates			
1325		[Exhibit Removed]			
1326	3/3/2013	Email; Subject: Re: AK - Updates			
1327	3/5/2013	Email; Subject: RP Notional Schedule			
1328	3/7/2013	Email; Subject: RP Letter			
1329	3/7/2013	Email; Subject: Carnegie Speech			
1330	3/8/2013	Email; Subject: Re: RP Trip			
1331	3/8/2013	Email; Subject: RP Visit to US			
1332		[Exhibit Removed]			
1333	3/10/2013	Email; Subject: RP Schedule			
1334	3/10/2013	Email; Subject: RP Oped			
1335	3/12/2013	Email; Subject: Briefing Book			
1336	3/12/2013	Email; Subject: Oped			
1337	3/13/2013	Email; Subject: FW: R: Expedited Port Courtesis for Romano Prodi			
1338	3/13/2013	Email; Subject: Re: R: Expedited Port Courtesis for Romano Prodi			
1339	3/13/2013	Email; Subject: Re: Fwd: RP			
1340		[Exhibit Removed]			
1341	3/13/2013	Email; Subject: Re: R: Expedited Port Courtesis for Romano Prodi			
1342	3/14/2013	Email; Subject: Fwd: Prodi Meeting with Rep. Keating: Readout			
1343	3/15/2013	Email; Subject: Washington Memo			
1344	3/19/2013	Email; Subject: Re: Prodi Media			
1345	2/25/2018	News Article; Business Insider; Former European leaders struggle to explain themselves after Mueller claims Paul Manafort paid them to lobby for Ukraine			
1346	2/28/2018	Telegram Message			
1347	2/28/2018	WhatsApp Message			
1348	3/6/2012	Senay; Wehrsten; Anderson; Saunders; Wunnerlich; Huttenlocher; Williams			
1349	5/4/2012	Document; Signature block Leonid Kozhara			
1350	5/11/2012	Email; Subject: Confidential: Project Veritas contract			
1351	5/18/2012	Email; Subject: Ukraine - what we've been up to			
1352	5/30/2012	Email; Subject: Re: Ukraine engagement			
1353	5/31/2012	Email; Subject: FW: Black Sea View Ltd			
1354	6/1/2012	Memo; PROPOSED OUTREACH LIST FOR SA LEGAL REPORT			
1355	6/18/2012	Email; Subject: Re: PR			
1356	7/17/2012	Email; Subject: Re: Confirmation			
1357	6/22/2012	Email; Subject: FW: RAPSI.com: U.S. attorneys in ECHR under Tymoshenko case to cost Ukraine \$12,5k			
1358	6/27/2012	Email; Subject: Website			
1359	7/10/2012	Email; Subject: Re: Asset Tracing			
1360	7/17/2012	Email; Subject: Re: Confirmation			
1361	7/29/2012	Email; Subject: Re: Media Plan			
1362	8/5/2012	Email; Subject: Re: Update			
1363	8/13/2012	Email; Subject: Re: Call			
1364	8/29/2012	Email; Subject: Re: Ukraine			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1365	8/30/2012	Email; Subject: Memo for Manafort			
1366	9/6/2012	Email; Subject: Call			
1367	9/6/2012	Email; Subject: Re: Lunch			
1368	9/12/2012	Outward Payment			
1369	9/12/2012	Email; Subject: FW: MY COMMENTS			
1370	9/13/2012	Email; Subject: Re: Meeting			
1371	9/17/2012	Email; Subject: Re: Project Veritas			
1372	9/21/2012	Email; Subject: Meeting Time			
1373	9/22/2012	Email; Subject: Re: Meeting on Sunday, Sept 23 with Greg Craig in NYC			
1374	9/23/2012	Email; Subject: Documents			
1375	9/23/2012	Email; Subject: Re: GP final report response			
1376	9/25/2012	Email; Subject: Re: Meeting and Items			
1377		[Exhibit Removed]			
1378	9/26/2012	Email; Subject: Notes			
1379	9/26/2012	Email; Subject: Updated documents			
1380	9/26/2012	Email; Subject: docs			
1381	9/27/2012	Email; Subject: Re: PJM Outline of Findings			
1382	9/28/2012	Email; Subject: Re: Update			
1383	9/29/2012	Email; Subject: Document			
1384	9/30/2012	Email; Subject: Re: Document			
1385	9/30/2012	Email; Subject: Wave 2			
1386	10/1/2012	Email; Subject: Re: Meeting			
1387	10/2/2012	Email; Subject: Re: Master Grid			
1388	10/2/2012	Email; Subject: Re: MFA Breifing Docs			
1389	10/2/2012	Email; Subject: Re: FYI			
1390	10/2/2012	Email; Subject: Matrix - Actions			
1391	10/5/2012	Email; Subject: Re: update			
1392	10/8/2012	Email; Subject: Phones			
1393	10/8/2012	Email; Subject: FW: Manafort meeting notes			
1394	10/18/2012	Email; Subject: Re: Rick Gates - Ukraine work			
1395	10/19/2012	Email; Subject: Project Veritas Long View.docx			
1396	10/25/2012	Email; Subject: Press Statements			
1397	11/26/2012	Email; Subject: Re: Report			
1398		[Exhibit Removed]			
1399		[Exhibit Removed]			
1400	12/6/2012	Email chain; Subject: FW: Updated Docs			
1401	12/6/2012	Email; Subject: Docs			
1402	12/6/2012	Email; Subject: Phase one media			
1403	12/10/2012	Email chain; Subject: Re: Journalist contact details needed			
1404	12/11/2012	Email; Subject: In reception			
1405	12/13/2012	Email chain; Subject: Re: Report Coverage			
1406	12/14/2012	Email; Subject: Please call right away			
1407	2/8/2013	Email; Subject: RE: Project Veritas 2013-01-30.docx			
1408	1/16/2013	Email; Subject: Re: Manafort			
1409	2/28/2014	Email; Subject: RE: Ukraine			
1410	12/3/2012	Calendar; Subject; Vin Weber and Paul Manafort to meet with Jim Kolbe at CW			
1411	1/31/2012	Memo; Subject: Request for Congressional Update			
1412	2/21/2012	Calendar; Subject: Rick Gates meeting re- representing the Government of Ukraine in DC			
1413	4/2/2012	Calendar; Subject: Ukraine meeting with Rick Gates			
1414	4/11/2012	Calendar; Subject: Internal Ukraine mtg w Vin, Rip, McSherry, Andrew Wright (for Sam O), Lucy by phone			
1415	5/14/2012	Itinerary for President Viktor A. Yushchenko			
1416	5/15/2012	Calendar; Subject: Viktor A. Yushchenko meeting with Rep.Burton			
1417	5/21/2013	Email; Subject: RE: AmCham - Jorge Zukoski			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1418		[Exhibit Removed]			
1419	6/11/2012	Document; Home Page for ECFMU			
1420		[Exhibit Removed]			
1421	6/14/2012	Calendar; Subject: Drinks with Rick Gates, Amb Motseyk, Vin/ Tony			
1422		[Exhibit Removed]			
1423	6/22/2012	Calendar; Subject: Accepted: Vin Weber / Joel Starr (Infofe) meeting for Ukraine			
1424	6/25/2012	Calendar; Subject: Vin Weber / Brian Wanko meeting for Ukraine			
1425		[Exhibit Removed]			
1426		[Exhibit Removed]			
1427	8/2/2012	Wire; Wells Fargo Wire Transfer Detail Report			
1428		[Exhibit Removed]			
1429	9/12/2012	Calendar; Subject: Meet Rick Gates & Paul M and Borys Kolesnikov ibreakfast room of			
1430	10/10/2012	Wire; Wells Fargo Wire Transfer Detail Report			
1431	10/18/2012	Report; Pre-Election Outreach Project			
1432		[Exhibit Removed]			
1433	10/24/2012	Report; Pre-Election Outreach Project			
1434	10/31/2012	Chat with Lucy Claire Saunders			
1435	11/9/2012	Email; Subject: RE: Call			
1436	11/16/2012	Wire; Wells Fargo Wire Transfer Detail Report			
1437	11/16/2012	Email; Subject: Ukraine			
1438	11/16/2012	Email; Subject: RE: Invoice 201210-0206 from Mercury Public Affairs LLC			
1439	11/20/2012	Calendar; Subject: Internal Ukraine Call Regarding Yefremov Visit - 11:30 EST / 10:30 Central			
1440	11/20/2012	Wire; Wells Fargo Wire Transfer Detail Report			
1441	11/20/2012	Calendar; Subject: Accepted: Internal Ukraine Call Regarding Yefremov Visit - 11:30 EST / 10:30 Central			
1442	11/27/2012	Email; Subject: Re: Meeting with Paul			
1443		[Exhibit Removed]			
1444		[Exhibit Removed]			
1445	12/3/2012	Calendar; Subject: Vin Weber and Paul Manafort to meet with Jim Kolbe at CW			
1446	12/3/2012	Calendar; Subject: Vin Weber and Paul Manafort to meet with Jim Kolbe at CW			
1447	12/4/2012	Calendar; Subject: Call Paul Manafort 703 623 4678			
1448	12/14/2012	Memo; Subject: Government Relations Strategy - ECFMU			
1449	12/17/2012	Email; Subject: RE: 2013			
1450	12/19/2012	Email; Subject: RE: NGO Targets / Dem Senate Relationships			
1451	12/21/2012	Wire; Wells Fargo Wire Transfer Detail Report			
1452		[Exhibit Removed]			
1453	1/16/2013	Email; Subject: Re: Call; Memo; Subject: US Congressional Resolutions - H.R. 27 and H.R. 28			
1454	1/21/2013	Email; Subject: Re: Fwd: US - This Week			
1455	1/24/2013	Email; Subject: RE: Meeting with Rohrabacher			
1456	1/29/2013	Calendar; Subject: FW: MCW Ukraine team to meet with Lawyer - Ken Gross re filings etc.			
1457	1/29/2013	Calendar; Subject: Rick Gates meeting @ MCW with MCW			
1458	1/30/2013	Email; Subject: RE: ECFMU - US Board Members			
1459	1/30/2013	Email; Subject: FW: Congressional Update (Rick Gates)			
1460	1/30/2013	Memo; Project Veritas revenue recognition			
1461	2/1/2013	Email; Subject: Re: ECFMU Board Suggestions			
1462	10/2/2013	Calendar; Lunch at Zaytinya (Vin Paul Rick)			
1463	2/12/2013	Calendar; MCW Ukraine team to meet with Lawyer - Ken Gross re filings etc.			
1464	2/13/2013	Email; Subject: GR for Ukraine			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1465	2/19/2013	Email; Subject: Re: Deliverables			
1466	2/18/2013	Email; Subject: RE: Criminal Justice Reform - Leave Behind			
1467	2/18/2013	Email; Subject: RE: Criminal Justice Reform - Leave Behind			
1468	2/19/2013	Calendar; Subject: Zaytinya / Paul Manafort			
1469	2/25/2013	Email; Subject: Re: AK Visit to US			
1470	2/26/2013	Email; Subject: RE: Carnegie Event			
1471	2/27/2013	Email; Subject: RE: AK Update Email; Subject: RE: Meetings			
1472		[Exhibit Removed]			
1473	3/1/2013	Calendar; Subject: Kwasniewski Meeting with Senate Foreign Relations Minority Staff			
1474	3/4/2013	Email; Subject: RE: Meeting Follow-up			
1475	2/11/2013	Calendar; Subject: Accepted: Ukraine internal meeting re assignments. FARA etc.			
1476	3/5/2013	Email; Subject: RE: Prodi Visit			
1477	3/6/2013	Email; Subject: RE: Prodi Visit			
1478	3/12/2013	Email; Subject: Re: RP Schedule			
1479	3/13/2013	Email; Subject: RE: RP Briefing Materials			
1480		[Exhibit Removed]			
1481	3/14/2013	Calendar; Subject: Romano Prodi Meeting with Rep. Tom Marino (R-PA)			
1482	3/14/2013	Email; Subject: FW: Manafort Weber meetings on 19th			
1483	3/15/2013	Wire; Wells Fargo Wire Transfer Detail Report			
1484	3/18/2013	Memo; Subject: Briefs for March 19 Meetings			
1485	3/18/2013	Email; Subject: Re: Briefing Materials for Paul			
1486	3/19/2013	Calendar; Subject: Dinner / Manafort, Rohrabacher & Weber/ reservation under Rehberg			
1487	3/19/2013	Calendar; Subject: Ukraine meeting at NED - Nadia Diuk =Paul Manafort/ Vin Weber			
1488	3/19/2013	Email; Subject: Read: Dinner / Manafort, Rohrabacher & Weber/ reservation under Rehberg			
1489	3/20/2013	Email; Subject: RE: Rosie Gray at Buzzfeed			
1490		[Exhibit Removed]			
1491	4/18/2013	Calendar; Ukraine Internal, VERY VERY IMPORTANT			
1492	4/19/2013	Memo; Subject: Quarterly Update			
1493	4/26/2013	Calendar; Subject: Call Rick Gates (917) 209-7176 - two things see notes			
1494	4/30/2013	Calendar; Subject: FW: ECFMU Meeting with Arjun Mody (Sen. Barrasso)			
1495	5/2/2013	Email; Subject: Re: Kozhara			
1496	5/7/2013	Email; Subject: Re: Rep Tom Marino (R-PA) House Committee on Foreign Affairs meet and greet			
1497	5/8/2013	Schedule; Meeting Schedule for Sergey Kluyev			
1498	5/10/2013	Calendar; Subject: Congressman Dana Rohrabacher he ask if you could give him a call Friday			
1499	5/12/2013	Email; Subject: Re: Rohrbacher			
1500	5/22/2013	Email; Subject: Re: Gusenbauer - Washington Visit			
1501	5/22/2013	Email; Subject: Re: Gusenbauer - Washington Visit			
1502		[Exhibit Removed]			
1503	5/29/2013	Calendar; Subject: Internal Ukraine Team			
1504	6/4/2013	Calendar; Subject: UKR Meeting with Joe Pinder			
1505	6/4/2013	Calendar; Subject: UKR Meeting with Gib Mullan			
1506	6/5/2013	Calendar; Subject: breakfast meeting with AG /Paul Tony Rick Vin			
1507	6/6/2013	Calendar; Subject: UKR Meeting with Rep. Aderholt			
1508	6/6/2013	Calendar; Subject: UKR Meeting with Rep. Marino			
1509	6/4/2013	Email; Subject: RE: AG Briefing Book			
1510	10/10/2012	Memo; Subject: STATUS UPDATE			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1511	6/7/2013	Receipt; Charlie Palmer			
1512	6/16/2013	Email; Subject: RE: Rosie Gray at Buzzfeed			
1513		[Exhibit Removed]			
1514	6/26/2013	Email; Subject: RE: RP			
1515	6/28/2013	Email; Subject: Re: Travel			
1516	7/10/2013	Email; Subject: Durbin Res			
1517		[Exhibit Removed]			
1518	8/15/2013	Email; Subject: RE: Reuters: Russia tightens customs rules to force Ukraine into union			
1519	8/22/2013	Email; Subject: Re: Meeting			
1520	8/27/2013	Email; Subject: Re: Outstanding Invoices from Mercury Public Affairs LLC			
1521	8/28/2013	Email; Subject: Re: McCain			
1522	8/29/2013	Email; Subject: FW: McCain			
1523		[Exhibit Removed]			
1524	9/11/2013	Email; Subject: Re: can you verify Ukraine paid us			
1525		[Exhibit Removed]			
1526	9/25/2013	Schedule; Subject: ECFMU Meeting with Rick Gates			
1527	9/25/2013	Calendar; Subject: Accepted: HOLD - Meeting with Rick			
1528	10/2/2013	Calendar; Subject: Lunch at Zaytinya (Vin Paul Rick)			
1529	10/9/2013	Email; Subject: Fwd: SK Proposed Schedule			
1530		[Exhibit Removed]			
1531	11/20/2013	Email; Subject: Fwd: request for you			
1532	11/26/2013	Calendar; Subject: Mercury/Podesta call on Ukraine			
1533		[Exhibit Removed]			
1534	11/26/2013	Email; Subject: RE: Report on Call with Rob Van de Water			
1535		[Exhibit Removed]			
1536	12/11/2013	Email; Subject: RE: Reuters enquiry on Rosie Gray article			
1537		[Exhibit Removed]			
1538	1/24/2014	Email; Subject: Re: Congressman Roskam			
1539	1/28/2014	Calendar; Subject: Call with Rob van de Water			
1540	1/29/2014	Email; Subject: Re: Where are we with wiring money			
1541		[Exhibit Removed]			
1542	2/3/2014	Email; Subject: Re: Elena Bondarenko			
1543	2/10/2014	Email; Subject: Re: Work agreement			
1544	1/17/2014	Email; Subject: Fwd: McCain/Cardin Bill			
1545	2/18/2014	Email; Subject: RE: Menendez			
1546	2/18/2014	Email; Subject: RE: Menendez			
1547	2/25/2014	Email; Subject: RE: Eli			
1548	3/1/2014	Email; Subject: Still no money			
1549		[Exhibit Removed]			
1550		[Exhibit Removed]			
1551	4/8/2014	Email; Subject: Wire			
1552	4/30/2014	Email; Subject: Items			
1553	5/1/2014	Schedule; Subject: Call with Rick Gates and Tony Podesta			
1554	5/6/2014	Email; Subject: RE:			
1555	5/8/2014	Email; Subject: ECFMU Termination			
1556	5/28/2014	Email; Subject: RE: Call			
1557	5/29/2014	Schedule; Subject: Call with Rick Gates			
1558	5/30/2014	Email; Subject: RE: Memo on Ukraine			
1559	6/5/2014	Email; Subject: Re: McCain			
1560	11/12/2014	Calendar; Subject: Mercury/Rick Gates Meeting			
1561	2012-2014	Email; Subject: RE: European center for modern Ukraine; Wire Records			
1562	2012-2014	Invoices; Mercury to the European Centre for a Modern Ukraine			
1563	8/18/2016	Email; Subject: Fwd: Follow-up question			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1564	8/19/2016	Email; Subject: Re: So Caplin's now engaged for Podesta Attorney client privileged			
1565	8/20/2016	Email; Subject: Re: one quick follow up question			
1566	8/23/2016	Email; Subject: RE: Note from Vin Weber			
1567	5/2/2017	Email; Subject: RE: Reporter Outreach to Hill Staff			
1568	4/13/2017	Email; Subject: Re: Today's WSJ			
1569	2/21/2012	Email; Subject: Ukraine Meeting			
1570	2/21/2012	Email; Subject: VM			
1571	3/2/2012	Email; Subject: pricing			
1572	3/26/2012	Calendar; Subject: Accepted: Rick Gates/Ukraine Meeting			
1573	3/30/2012	Email; Subject: Re: Ukraine			
1574	4/1/2012	Document; Podesta Group - Client Summary - April 2012			
1575	4/1/2012	Email; Subject: Re: Ukraine			
1576		[Exhibit Removed]			
1577	4/2/2012	Calendar; T. Podesta; April 02, 2012			
1578	4/2/2012	Email; Subject: 2012 Ukraine Draft			
1579	4/3/2012	Email; Subject: RE: draft contract			
1580	4/4/2012	Email; Subject: Re: ukraine follow-up			
1581	4/5/2012	Email; Subject: Ukraine Outline			
1582	4/5/2012	Calendar; Subject: Accepted: Vin Weber/Ukraine Meeting			
1583	4/9/2012	Email; Subject: RE: Wednesday (April 11th)			
1584		[Exhibit Removed]			
1585	4/11/2012	Calendar; T. Podesta; April 11, 2012			
1586	4/16/2012	Email; Subject: RE: Ukraine			
1587	4/17/2012	Email; Subject: Re: draft contract			
1588	4/17/2012	Email; Subject: Contract and FARA drafts			
1589	4/18/2012	Email; Subject: follow up			
1590		[Exhibit Removed]			
1591	4/20/2012	Email; Subject: Plan			
1592	4/20/2012	Email; Subject: Draft doc -- Ukraine			
1593	4/25/2012	Email; Subject: quick call?			
1594	4/27/2012	Email; Subject: Contracts			
1595	4/27/2012	Email; Subject: FARA forms			
1596	4/27/2012	Email; Subject: Ukraine FARA/LDA			
1597	4/27/2012	Email; Subject: RE: Ukraine FARA/LDA			
1598	4/28/2012	International Sector Meeting			
1599	4/30/2012	Email; Subject: Call with Mercury/Ken Gross			
1600	5/1/2012	Email; Subject: Treatment of Former Prime Minister Yulia Tymoshenko			
1601	5/2/2012	Email; Subject: FW: Huffington Post Calls For U.S. Action Against Ukraine			
1602	5/2/2012	Email; Subject: Ukraine			
1603	5/2/2012	Calendar; Subject: Conference call with Gates/Weber/Podesta....			
1604	5/2/2012	Email; Subject: 2nd Ukraine call with Mercury/counsel			
1605	5/3/2012	Email; Subject: registration			
1606	5/3/2012	Email; Subject: Ukraine			
1607	5/3/2012	Email; Subject: Final Ukraine decision			
1608	5/4/2012	Email; Subject: Send to Rick?			
1609	5/8/2012	Email; Subject: no contract no money no registration LDA			
1610	5/8/2012	Email; Subject: U.S. Helsinki Commission to hold briefing on Ukraine			
1611	5/9/2012	Email; Subject: Contracts			
1612	5/9/2012	Email; Subject: Meeting opportunity			
1613	5/9/2012	Email; Subject: Meeting opportunity			
1614	5/9/2012	Email; Subject: Strategy			
1615	5/9/2012	Email; Subject: Documents			
1616	5/10/2012	Email; Subject: Ukraine update			
1617	5/10/2012	Email; Subject: Ukraine - Blinken meeting			
1618	5/10/2012	Email; Subject: Mercury C&W meetings approved via Rick thus far			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1619	5/10/2012	Email; Subject: Mercury C&W meetings approved via Rick thus far			
1620	5/10/2012	Email; Subject: Blinken			
1621	5/10/2012	Email chain; Subject: RE: NATO			
1622	5/11/2012	Email; Subject: Meeting Request: Former Ukranian President Victor Yushchenko			
1623	5/11/2012	Email; Subject: RE: Mercury C&W meeting approved via Rick thus far			
1624	5/15/2012	Email; Subject: Update			
1625	5/16/2012	Email; Subject: FW: Ukraine			
1626	5/17/2012	Email; RE: Documents			
1627	5/17/2012	Email; Subject: Re: Any Update			
1628	5/18/2012	Email; Subject: MFA - Gryshchenko			
1629	5/18/2012	Email; Subject: Re: fran MFA - Gyrshchencko			
1630	5/21/2012	Email; Subject: RE: Ukraine			
1631	5/22/2012	Email; Subject: RE: Signed ECFMU Contract			
1632	5/23/2012	Email; Subject: Re: FARA issue			
1633	5/23/2012	Email; Subject: Burton Codel			
1634	5/24/2012	Email; Subject: FW: Letter re: LDA vs. FARA filing			
1635	5/25/2012	Email; Subject: Re: Fwd: Any money from ukraine?			
1636	5/25/2012	Email; Subject: Re: Sen. Inhofe			
1637	5/30/2012	Email; Subject: money			
1638	5/30/2012	Calendar; Subject: Ukraine: Inhofe amendment			
1639	5/30/2012	Email; Subject: Inhofe Ukraine Amendment			
1640	5/30/2012	Email; Subject: FW: Inhofe Amendment			
1641		[Exhibit Removed]			
1642	5/30/2012	Email; Subject: Re: wire has not arrived where are we? please call me			
1643	6/4/2012	Email; Subject: RE: wire			
1644	5/31/2012	Email; Subject: FW: Inhofe Amendment			
1645	6/6/2012	Email; Subject: Re: item for you			
1646	6/6/2012	Email; Subject: RE: Website Contact Staff Form Submission			
1647	6/7/2012	Email; Subject: back to the future			
1648		[Exhibit Removed]			
1649	6/8/2012	Email; Subject: RE: Hill targets			
1650	6/8/2012	Email; Subject: FW: Draft oped			
1651	6/11/2012	Email; Subject: RE: Vin Weber			
1652	6/12/2012	Email; Subject: FW: Ukraine call summary			
1653	6/13/2012	Email; Subject: RE: Hill targets			
1654	6/14/2012	Email; Subject: ecfmu			
1655	6/19/2012	Email; Subject: Re: Ukraine call			
1656	6/24/2012	Email; Subject: Ohendovskiy Visit - Draft Schedule			
1657	6/27/2012	Email; Subject: Re: what works for us?			
1658	6/28/2012	Email; Subject: sovereign contract a/r update			
1659	7/2/2012	Email; Subject: Re: fyi - upcoming allies release			
1660		[Exhibit Removed]			
1661	7/4/2012	Calendar; Subject: ECFMU Call - Re-Scheduled - Thursday 10:00 EST (9:00am Central)			
1662	7/5/2012	Email; Subject: FW: Interview request (for Leonid Kozhara) from Newsweek/Daily Beast - REQUEST for background info			
1663	7/8/2012	Email; Subject: Fw: Talk			
1664	7/9/2012	Email; Subject: Fw: Internal Q & A			
1665	7/16/2012	Email; Subject: FW: Ukraine Update			
1666		[Exhibit Removed]			
1667		[Exhibit Removed]			
1668	7/11/2012	Email; Subject: RE: Ukraine Wire.			
1669	7/16/2012	Email; Subject: RE: Rick Gates / Ina Kirsch			
1670		[Exhibit Removed]			
1671	7/16/2012	Email; Subject: european centre for a modern ukraine q&a			
1672	7/17/2012	Email; Subject: Ukraine meeting summary			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1673	7/27/2012	Email; Subject: RE: do you have a list of all the countries that PG represents?			
1674	8/7/2012	Email; Subject: Re: Synopsis of work done for ECFMU			
1675	8/8/2012	Email; Subject: Update			
1676	8/10/2012	Email; Subject: Question			
1677	8/24/2012	Email; Subject: ECFMU Elections Strategy Document			
1678	8/27/2012	Email; Subject: Fw: Dem Convention			
1679	8/27/2012	Email; Subject: Re: Question			
1680	8/28/2012	Email; Subject: E-MAIL ADDRESS for communication with Gorshenin Institute on topic of elections			
1681	8/30/2012	Email; Subject: RE: Democratic National Convention - Charlotte			
1682	8/30/2012	Email; Subject: Re: Boris Kolisnikov			
1683	9/6/2012	Email; Subject: RE: Democratic National Convention - Charlotte			
1684	9/10/2012	Email; Subject: FW: BVK Visit			
1685	9/11/2012	Agenda; Meeting Agenda - CURRENT Schedule, DPM Boris Kolisnikov			
1686	9/12/2012	Email; Subject: List of critical questions surrounding topic of UA elections to be developed (DEADLINE: 13 Sept, 5 pm EST)			
1687	4/5/2012	Email; Subject: FW: draft contract			
1688	9/13/2012	Email; Subject: RE: Reminder: draft program for Lutkovskaya visit			
1689	9/13/2012	Email; Subject: RE: Reminder: draft program for Lutkovskaya visit			
1690	9/14/2012	Calendar; Subject: UKR Call to Discuss S.Res.466			
1691	9/14/2012	Email; Subject: RE: Flagging mark-up next week			
1692	9/14/2012	Email; Subject: FW: Flagging mark-up next week			
1693	9/17/2012	Calendar; Subject: Ukraine Call			
1694	9/17/2012	Email; Subject: Fw: Meeting			
1695	9/17/2012	Email; Subject: FW: URGENT			
1696	9/17/2012	Email; Subject: RE: URGENT			
1697	9/17/2012	Email; Subject: RE: Flagging mark-up next week			
1698	9/17/2012	Email; Subject: RE: URGENT			
1699	9/18/2012	Email; Subject: List of contacts			
1700	9/18/2012	Email; Subject: President - Interview			
1701	9/19/2012	Calendar; Subject: S Res Discussion			
1702	9/19/2012	Email; Subject: Re: Action items			
1703	9/19/2012	Email; Subject: RE: URGENT			
1704	9/19/2012	Email; Subject: Ukraine call/follow-up			
1705	9/20/2012	Email; Subject: RE: Senate schedule			
1706	9/20/2012	Email; Subject: Manchin			
1707		[Exhibit Removed]			
1708	9/20/2012	Email; Subject: RE: United Coal			
1709	9/20/2012	Email; Subject: RE: URGENT			
1710		[Exhibit Removed]			
1711	9/21/2012	Email; Subject: RE: Senate schedule			
1712	9/22/2012	Email; Subject: Re: Call Manchin AGAIN re Ukraine			
1713	9/22/2012	Email; Subject: Re: Fwd: Europe OpEd			
1714	9/22/2012	Email; Subject: Re: Who			
1715	9/22/2012	Email; Subject: Fw: HOTLINE-S.RES.466: YULIA TYMOSHENKO			
1716		[Exhibit Removed]			
1717	9/22/2012	Email; Subject: Re: Call			
1718	9/22/2012	Email; Subject: Re: Manchin			
1719	9/22/2012	Email; Subject: Re: Europe OpEd			
1720		[Exhibit Removed]			
1721	9/24/2012	Email; Subject: FW: Blinken			
1722	9/24/2012	Email; Subject: Fw: SL Bio			
1723	9/24/2012	Email; Subject: Fwd: Europe OpEd			
1724	9/24/2012	Email; Subject: Re: Items			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1725	9/25/2012	Email; Subject: ECFMU welcomes new team member, Marina Macherenkova			
1726	9/27/2012	Email; Subject: Fwd: Meeting Agenda			
1727	10/1/2012	Email; Subject: Re: Ukraine follow-up			
1728	10/1/2012	Calendar; Subject: ECFMU/Ukraine Call			
1729	10/2/2012	Email; Subject: RE: Rick Gates			
1730	10/2/2012	Email; Subject: Re: do we have ukraine memo?			
1731	10/3/2012	Email; Subject: FW: Ukraine election Strategy			
1732	10/3/2012	Email; Subject: Re: Manchin called me today			
1733	10/9/2012	Spreadsheet; Podesta Group - Staff Detail - September 2012			
1734	10/10/2012	Email; Subject: Re: What's dues us from ukriane			
1735	10/10/2012	Email; Subject: For Our Meeting Today			
1736	10/11/2012	Email; Subject: Lutkovska and other			
1737	10/15/2012	Email; Subject: RE: Ukraine			
1738	10/15/2012	Email; Subject: FW: Urgent			
1739	10/16/2012	Email; Subject: RE: Congressional Staff interested in Election Monitoring			
1740	10/16/2012	Email; Subject: FW: Pre-election Outreach			
1741	10/17/2012	Report & Letters; Pre-Election Outreach Project			
1742	10/17/2012	Report; Pre-Election Outreach Project			
1743	10/17/2012	Report; Pre-Election Outreach Project			
1744	10/18/2012	Email; Subject: RE: Urgent			
1745	10/19/2012	Email; Subject: Thank you			
1746	10/22/2012	Spreadsheet; Podesta Projects			
1747	10/23/2012	Email; Subject: ECFMU Newsletter			
1748	10/23/2012	Email; Subject: Smith resolution			
1749	10/23/2012	Email; Subject: FW: Smith resolution			
1750	10/24/2012	Email; Subject: Re: OpEd			
1751	10/30/2012	Email; Subject: Re: US Statement on elections			
1752	10/31/2012	Email; Subject: Berman's Committee Chief of Staff			
1753	10/31/2012	Email; Subject: ECFMU: Ukraine Election Newsflash - 31 October 2012			
1754		[Exhibit Removed]			
1755	10/31/2012	Email; Subject: ECFMU: Ukrainian Parliamentary Election, October 28			
1756	11/1/2012	Email; Subject: Re: White House - URGENT			
1757	11/1/2012	Email; Subject: Re: MFA Statement			
1758	11/13/2012	Email; Subject: Ukraine press/policy ideas			
1759	11/26/2012	Email; Subject: Fw: Ukraine			
1760	11/14/2012	Email; Subject: Re: Readout of the Vice President's Call with Ukrainian President Viktor Yanukovych			
1761	11/19/2012	Memo; Subject: Post-Election Public Affairs Plan and Long-Term Press Strategy			
1762	11/20/2012	Email; Subject: Re: Party of Regents leader Olexandr Yefremov			
1763	11/29/2012	Email; Subject: RE: Assessment			
1764	11/29/2012	Email; Subject: RE: Assessment			
1765	11/29/2012	Email; Subject: RE: Catching Up			
1766	11/29/2012	Email; Subject: RE: Assessment			
1767	12/4/2012	Email; Subject: December			
1768	12/5/2012	Email; Subject: ukraine			
1769	12/6/2012	Email; Subject: RE: Skadden Report			
1770	12/10/2012	Email; Subject: RE: invitation: Supporting Democracy in Georgia and Ukraine, Tuesday, December 18, 12:15 p.m.			
1771	12/11/2012	Email; Subject: Skadden report update			
1772	12/14/2012	Email; Subject: Fw: Engage Ukraine 2013			
1773	12/21/2012	Email; Subject: RE: follow up			
1774	12/23/2012	Email; Subject: FW: Google Alert - Tymoshenko			
1775		[Exhibit Removed]			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1776	1/7/2013	Email; Subject: RE: Steve Pifer of Brookings Institute			
1777	1/8/2013	Email; Subject: Steve Pifer of Brookings Institute			
1778	1/10/2013	Email; Subject: Re: meeting with Ukraine DCM			
1779	1/17/2013	Spreadsheet; Contact Information			
1780	1/31/2013	Email; Subject: RE: DC engagement plan for the Honorable Sergei Kluyev			
1781	2/1/2013	Email; Subject: Proposed Board Members for the ECFMU			
1782	2/6/2013	Pre-Billing Worksheet For Invoices to be sent on February 10, 2013			
1783	2/8/2013	Email; Subject: RE: ECFMU Board			
1784	2/18/2013	RE: Deliverables			
1785	2/18/2013	Email; Subject: Fw: Meeting			
1786	2/18/2013	Email; Subject: Re: Meeting			
1787	2/19/2013	Email; Subject: Ukraine			
1788	3/1/2013	Email; Subject: Re: AK Visit			
1789	3/3/2013	Email; Subject: RE: Pyatt			
1790	3/12/2013	Email; Subject: FW: RP Schedule			
1791	3/7/2013	Email; Subject: RE: Orest and MP S. Vlasenko			
1792	3/11/2013	Email; Subject: RE: Kerry Prodi meeting			
1793	3/14/2013	Email; Subject: RE: Congressional Ukraine Caucus			
1794	3/17/2013	Email; Subject: Re: Interviews			
1795	3/18/2013	Email; Subject: RE: Sherman			
1796	3/18/2013	Email; Subject: Please			
1797		[Exhibit Removed]			
1798	3/20/2013	Email; Subject: Memo for Gates meeting			
1799	3/22/2013	Email; Subject: Fw: The Next 90 Days			
1800	3/25/2013	Memo; Subject: Klyuiev Visit			
1801	3/27/2013	Email; Subject: Engage Ukraine Hill meeting			
1802	3/28/2013	Email; Subject: Fw: Outside View: Washington consultants and opaque Ukrainian government tenders			
1803	3/28/2013	Email; Subject: Readout from meeting with State Department Official			
1804	3/28/2013	Email chain; Subject: FW: Outside View: Washington consultants and opaque Ukrainian government tenders			
1805	4/6/2013	Email; Subject: Fwd: COMPLETELY CONFIDENTIAL on Ukraine			
1806	4/8/2013	Email; Subject: Strategy Document			
1807	4/9/2013	Email; Subject: RE: Lutsenko-pitch-blogs-040813			
1808	4/9/2013	Email; Subject: Ukraine PR			
1809	4/15/2013	Email; Subject: FW: Sergey Klyuiev's CV			
1810	4/19/2013	Email; Subject: RE: Report			
1811	4/26/2013	Email; Subject: Re: Schedule Update			
1812	4/30/2013	Email; Subject: Ukrainian Ambassador			
1813	5/1/2013	Email; Subject: RE: Ukrainian Foreign Minister Leonid Kozhara			
1814	5/2/2013	Email; Subject: Re: Kozhara			
1815	5/6/2013	Email; Subject: RE: Meeting request on behalf of the Foreign Minister of Ukraine			
1816	5/8/2013	Email; Subject: RE: CSIS			
1817	5/8/2013	Email; Subject: Ukraine op-ed			
1818	5/10/2013	Email; Subject: RE: Meeting Summary			
1819	5/10/2013	Email; Subject: Ukraine FM			
1820		[Exhibit Removed]			
1821	5/11/2013	Email; Subject: Re: Deliverables			
1822	5/12/2013	Email; Subject: Fwd: Follow-up			
1823	5/14/2013	Email; Subject: RE: Ukraine			
1824	5/28/2013	Email; Subject: Dr. Gusenbauer visit			
1825	5/28/2013	Email; Subject: Centre for Modern Ukraine outstanding money			
1826	5/30/2013	Email; Subject: Lunch w/Fred Turner			
1827	6/4/2013	Email; Subject: RE: AG Briefing Book			
1828	6/6/2013	Pre-Billing Worksheet For Invoices to be sent on June 10, 2013			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1829	6/6/2013	Pre-Billing Worksheet For Invoices to be sent on August 10, 2013			
1830	6/12/2013	Email; Subject: RE: Durbin Floor Statement on Tymoschenko			
1831	6/18/2013	Email; Subject: Meeting w/Sen. Durbin staff			
1832	6/19/2013	Email; Subject: Re: Venice Weekend 2013 Invite List			
1833	6/24/2013	Email; Subject: Re: S.R. 165 - Durbin			
1834	6/25/2013	Email; Subject: Centre for a Modern Ukraine			
1835	6/25/2013	Email; Subject: Re: Manchin			
1836	6/25/2013	Email; Subject: Please Review			
1837	7/8/2013	Email; Subject: RE: Centre for a Modern Ukraine			
1838	7/11/2013	Email; Subject: RE: Rick Gates			
1839	7/11/2013	Email; Subject: RE: Rick Gates request			
1840	7/25/2013	Email; Subject: Re: Manchin			
1841	8/5/2013	Email; Subject: FW: Ukraine update			
1842	8/8/2013	Email; Subject: FW: SK Visit			
1843	8/8/2013	Email; Subject: Re: SK Visit			
1844		[Exhibit Removed]			
1845		[Exhibit Removed]			
1846	8/27/2013	Email; Subject: RE: Vin Weber			
1847		[Exhibit Removed]			
1848	9/4/2013	Email; Subject: Gates			
1849	9/4/2013	Email; Subject: Re: Fall Efforts			
1850	9/5/2013	Pre-Billing Worksheet For Invoices to be sent on September 10, 2013			
1851	9/16/2013	Email; Subject: FW: UN GA media for VFY			
1852	9/25/2013	Email; Subject: Re: Ukraine			
1853	9/30/2013	Email; Subject: Re: Ukraine Update			
1854	10/1/2013	Email; Subject: FW: Meeting			
1855	10/7/2013	Email; Subject: FW: Visit Sergey Kluyev			
1856	10/8/2013	Email; Subject: RE: Eastern Partnership Summit resolution			
1857	10/9/2013	Email; Subject: RE: Assume you've seen these			
1858	10/9/2013	Email; Subject: RE: Funding for ECMFU			
1859	10/18/2013	Email; Subject: Re: Kalyuzhnyy and Geller Visit			
1860	10/17/2013	Email; Subject: Re: Message			
1861	10/23/2013	Email; Subject: RE: Ukraine - IMF contacts			
1862	10/24/2013	Email; Subject: RE: Question			
1863	4/25/2013	Email; Subject: RE: Klyuiev/Wall Street Journal			
1864		[Exhibit Removed]			
1865	11/1/2013	Email; Subject: FW: Update			
1866	11/11/2013	Pre-Billing Worksheet For Invoices to be sent on November 10, 2013			
1867	11/18/2013	Email; Subject: D Res			
1868	11/19/2013	Email; Subject: Proposed Kluyuev Visit			
1869	11/19/2013	Email; Subject: Memo			
1870	11/23/2013	Email; Subject: Re: Readout of the Vice President's Call with Ukrainian President Viktor Yanukovych			
1871	12/5/2013	Pre-Billing Worksheet For Invoices to be sent on December 10, 2013			
1872	12/6/2013	Email; Subject: Fw: Yanukovych sold Ukraine out to Putin			
1873	12/13/2013	Email; Subject: RE: MBDA Internal Mtg			
1874	12/17/2013	Email; Subject: Re: S.Res 319			
1875	12/18/2013	Email; Subject: SFRC business meeting			
1876	12/19/2013	Email; Subject: RE: A couple of points			
1877	12/24/2013	Email; Subject: Re: Transfer			
1878	1/8/2014	Pre-Billing Worksheet For Invoices to be sent on January 10, 2014			
1879	1/10/2014	Email; Subject: Re: BUSINESS MEETING AND IMPLICATIONS OF THE CRISIS IN UKRAINE HEARING			
1880	1/17/2014	Client Contact List			
1881	1/28/2014	Email; Subject: RE: HR 447			
1882	1/29/2014	Email; Subject: Re: Negative attention due to our work in Ukraine			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1883	2/5/2014	Email; Subject: FW: ECFMU Declaration/Заява Європейського Центру Сучасної України			
1884	2/6/2014	Pre-Billing Worksheet For Invoices to be sent on February 10, 2014			
1885	2/6/2014	Email; Subject: Re: 'Fuck the EU,' frustrated Nuland says to Pyatt, in alleged leaked phone call			
1886	2/11/2014	Email; Subject: FW: Guest List			
1887	2/11/2014	Email; Subject: Re: Guest List			
1888	2/18/2014	Email; Subject: Fw: Menendez			
1889	2/18/2014	Email; Subject: Menendez			
1890	2/18/2014	Email; Subject: FW: Live Updates			
1891	2/20/2014	Email; Subject: Re: A futile gesture?			
1892	2/21/2014	Email; Subject: Fw: Where's the wire from last year			
1893	2/22/2014	Email; Subject: Re: NYTimes: Ukraine's Leader Flees Palace as Protesters Widen Control			
1894	2/25/2014	Email; Subject: FW: Podesta in the News Today			
1895	2/25/2014	Email; Subject: Re: Did u get emails today from ina?			
1896	2/26/2014	Email; Subject: Re: Podesta in the News Today			
1897	3/4/2014	Email; Subject: Re: Any money from bvi ? Ukraine??			
1898	3/6/2014	Press Release; White House Press Release re Executive Order			
1899	3/6/2014	Email; Subject: Re: Executive Order and Message to the Congress -- Blocking Property of Certain Persons Contributing to the Situation in Ukraine			
1900	3/13/2014	Email; Subject: Fw: Received Ukraine Wire today.			
1901		[Exhibit Removed]			
1902	3/25/2014	Email; Subject: Re: Received Ukraine Wire today.			
1903	3/25/2014	Email; Subject: Re: Received Ukraine Wire today.			
1904	3/26/2014	Email; Subject: Fw: Ukraine & SGR Text			
1905	3/30/2014	Email; Subject: Re: Received Ukraine Wire today.			
1906	4/15/2014	Email; Subject: draft Ukraine lobbying report			
1907	4/21/2014	Email; Subject: FW: Tymo			
1908	5/5/2014	Email; Subject: Fw: can you get someone to pull our loBbying rankings in 2003 to 2013 and top ten clients for each of these years			
1909	5/7/2014	Email; Subject: RE: QFRs for the Ukraine HFAC hearing			
1910	5/7/2014	Email; Subject: FW: Trident			
1911	5/7/2014	Email; Subject: FW: Monitoring Groups			
1912	5/7/2014	Email; Subject: Fw: Message to the Congress -- With respect to Russia's status under the Generalized System of Preferences			
1913	5/10/2014	Email; Subject: Fw: Tridentds			
1914	6/26/2012	Email; Subject: RE: woodrow wilson center contact			
1915	8/16/2016	Email; Subject: Re: Questions			
1916	2/26/2012	Email; Subject: Fwd: Podesta Group Proposal			
1917	9/19/2012	Email; Subject: RE: Ukraine resolution			
1918	2012-2014	Schedule & Calendar; Centre for a Modern Ukraine Meetings and Calls			
1919	Undated	Client List			
1920		[Exhibit Removed]			
1921		[Exhibit Removed]			
1922		[Exhibit Removed]			
1923		[Exhibit Removed]			
1924		[Exhibit Removed]			
1925		[Exhibit Removed]			
1926		[Exhibit Removed]			
1927		[Exhibit Removed]			
1928		[Exhibit Removed]			
1929		[Exhibit Removed]			
1930		[Exhibit Removed]			
1931		[Exhibit Removed]			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
1932		[Exhibit Removed]			
1933		[Exhibit Removed]			
1934		[Exhibit Removed]			
1935	3/6/2013	Email; Subject: Re: Prodi Visit			
1936	12/15/2012	Email; Subject: Re: US State Dept - Press Briefing			
1937	11/19/2013	Email; Subject: Fwd: DURBIN RESOLUTION CALLING FOR THE RELEASE OF FORMER UKRAINE PRIME MINISTER YULIA TYMOSHENKO PASSES US SENATE			
1938	11/19/2013	Email; Subject: Memo			
1939	4/25/2013	Email; Subject: Update			
1940	2/25/2014	Email; Subject: Fwd: Contracts			
1941	7/5/2012	Email; Subject: RE: Interview request (for Leonid Kozhara) from Newsweek/Daily Beast - REQUEST for background info			
1942	10/29/2012	Email; Subject: FW: 10/29 Contact Reports (1 of 2)			
1943	10/29/2012	Email; Subject: FW: 10/29 Contact Reports (2 of 2)			
1944	7/6/2012	Email; Subject: RE: Internal Q & A			
1945	2/6/2014	Calendar; Subject: ECFMU Meeting with Congressman Rohrbacher			
1946	2/28/2013	Email; Subject: RE: Meetings			
1947	4/5/2013	Email; Subject: Re: EU Updates			
1948	5/22/2011-11/21/2015	Calendar of Eckart Sager			
1949	11/13/2012	Email; Subject: Strategy Document			
1950	11/16/2011	Email; Subject: Details			
1951	1/3/2012	Memo; Subject: Phase Two of Our Strategic Communications Work, Action Plan for January to December 2012			
1952	5/13/2012	Email; Subject: RE: Ukraine's FM in DC			
1953	5/16/2012	Email; Subject: Meeting			
1954	5/18/2012	Email; Subject: Re: Meeting			
1955	5/19/2012	Email; Subject: Re: Meetings Monday in Washington			
1956	5/29/2012	Email; Subject: Re: Call on Wellmann etc			
1957	10/18/2012	Email; Subject: FW: Draft news story for dissemination tomorrow (if you agree)			
1958	10/23/2012	Memo; Subject: Berlin Conference Deliverables			
1959	11/30/2012	Email; Subject: Q & A material and the Briefing Process			
1960	1/29/2013	Email; Subject: my yahoo not working but here is agenda for PJM			
1961	6/21/2007	Email; Subject: RE: Ukraine Documents & Needs			
1962	4/18/2012	Executed engagement agreement/contract between Mercury and ECFMU			
1963	4/18/2012	Executed engagement agreement/contract between Podesta and ECFMU			
1964	8/10/2012	Email; Subject: Question			
1965	2014	Invoices; FTI to Davis Manafort & Prosecutor general Ukraine			
1966	2012	FTI Wires and Accounting Records			
1967	2012-2014	Invoices; Podesta Group to Rick Gates, Centre for a Modern Ukraine			
1968	2012-2014	Podesta Group Accounting and Wire Records			
2000	3/23/2011	Email; Subject: Your travel to Kyiv			
2001	2/20/2012	Letter; Re: Preliminary Engagement			
2002	2/28/2012	Email; Subject: FW: Anything new?			
2003	2/28/2012	Email; Subject: FW: Anything new?			
2004	3/6/2012	Email; Subject: Re: Retainer letter & Next Steps			
2005	3/22/2012	Email; Subject: Manafort meeting tomorrow will be in the boardroom			
2006	3/29/2012	Email; Subject: RE: Daily New Client 3/29/12- Ministry of Justice, Government of Ukraine			
2007	3/29/2012	Email; Subject: FW: Re:			
2008	3/29/2012	Email; Subject: RE: Memo to Manafort about trip to Ukraine			
2009	3/30/2012	Email; Subject: FW: Memo to Paul Manafort re Ukraine Project			
2010	4/2/2012	Email; Subject: FW: Tymo case docs			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
2011	4/3/2012	Email; Subject: RE: Report of the temporary investigative commission chaired by Inna Bogoslovskaya			
2012	4/5/2012	Memo; Subject: Projects and Plans			
2013	4/11/2012	Email; Subject: FW: Tomorrow--Friday 4/6			
2014	4/11/2012	Email; Subject: RE: Kuzmin on New charges against Tymo			
2015	4/11/2012	Email; Subject: Re:			
2016	4/12/2012	Email; Subject: Re: the wire re Ukraine			
2017	4/16/2012	Email; Subject: Re: re Ukraine wire			
2018	4/17/2012	Email; Subject: Re: FARA issues			
2019	4/17/2012	Email; Subject: Re: FARA issues			
2020	4/18/2012	Mercury/Clark Weinstock Lobbying Registration			
2021	4/25/2012	Email; Subject: Re: conference call today with Greg Craig			
2022	4/30/2012	Email; Subject: FW: PR Firms			
2023	4/30/2012	Email; Subject: FW: Ukraine - Application of the Foreign Agents Registration Act of 1938 ("FARA") PROPER ATTACHMENTS			
2024	5/1/2012	Email; Subject: FW: Ukraine and reputation...			
2025	5/3/2012	Email; Subject: Meeting Notes: 5/2/12			
2026	5/3/2012	Email; Subject: Investigation of Tymo allegations of "beating"			
2027	5/7/2012	Email; Subject: RE: Tymo			
2028	5/7/2012	Email; Subject: RE: PR Update			
2029	5/7/2012	Email; Subject: RE: Ukrainian Law Experts			
2030	5/8/2012	Email; Subject: RE: Documents			
2031	5/10/2012	Email; Subject: FW: FTI			
2032	5/10/2012	Email; Subject: FW: Re:			
2033	5/16/2012	Memo; Interim Report			
2034	5/18/2012	Email; Subject: Letter re: LDA vs. FARA filing			
2035		[Exhibit Removed]			
2036	5/22/2012	Email; Subject: RE: Ukraine Heads Up			
2037	5/22/2012	Email; Subject: RE:			
2038	5/23/2012	Email; Subject: Points			
2039	5/23/2012	Email; Subject: RE: Press statements			
2040	5/23/2012	Email; Subject: RE: Press statements			
2041	5/24/2012	Email; Subject: RE: Letter Agreement			
2042	5/24/2012	Email; Subject: Press Release and EL			
2043	5/24/2012	Email; Subject: Re: Press Release and EL			
2044	5/24/2012	Email; Subject: FW: Statement			
2045	5/24/2012	Email; Subject: RE: FTI are checking out and going home - their bosses are pulling them out			
2046	5/26/2012	Email; Subject: Tymoshenko case			
2047	5/29/2012	Email; Subject: Re: thanks for your help			
2048	5/30/2012	Email; Subject: Fw: thanks for your help			
2049	6/5/2012	Email; Subject: RE: Are you seeing Andrea Manafort today?			
2050	6/5/2012	Email; Subject: Manafort Update			
2051	6/6/2012	Calendar; Subject: 3:45 pm - Call with Senator Durbin re Ukraine			
2052	6/6/2012	Email; Subject: getting together			
2053	6/6/2012	Email; Subject: Senator Durbin is going to call you at 3:45 to talk about Ukraine			
2054	6/22/2012	Email; Subject: again thank you			
2055	5/23/2012	Email; Subject: Fw: Statement			
2056	6/25/2012	Email; Subject: Vlasenko			
2057		[Exhibit Removed]			
2058	6/27/2012	Email; Subject: RE: Website			
2059	7/2/2012	List of Contacts; Skadden Report - July 2, 2012			
2060	7/2/2012	Email; Subject: Tymoschenko			
2061	7/9/2012	Email; Subject: FTI			
2062	7/18/2012	Email; Subject: Fw: Fwd: Project Veritas - Communications Strategy			
2063		[Exhibit Removed]			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
2064	7/26/2012	Email; Subject: Re: your plan in Kiev			
2065	7/27/2012	Memo; Subject: SA Report - Media Plan			
2066	7/28/2012	Email; Subject: Media Plan			
2067	8/3/2012	Email; Subject: Manafort is seeing BG on Wednesday			
2068	8/7/2012	Email; Subject: Re: Tymo report - action points and questions			
2069	8/9/2012	Email; Subject: RE: Kyiv Post Editorial: Skadden Stink			
2070	8/15/2012	Email; Subject: RE: Confidential Partial Translation Return (444-530A)			
2071	8/16/2012	Email; Subject: RE: Meeting at 3 p.m. today			
2072		[Exhibit Removed]			
2073	8/24/2012	Email; Subject: RE: Hello Sergiy -- Two Important Questions			
2074	8/27/2012	Memo; Subject: SA Report - Media Plan			
2075	8/28/2012	Email; Subject: FW:			
2076	8/29/2012	Email; Subject: Tymo memo			
2077	8/30/2012	Email; Subject: RE: Work Schedule to finalize report			
2078	8/30/2012	Email; Subject: Re: Project 2			
2079	8/30/2012	Email; Subject: Re: Project 2			
2080	9/3/2012	Email; Subject: RE: final version of the comments			
2081	9/5/2012	Email; Subject: Government comments			
2082	9/3/2012	Email; Subject: final version of the comments			
2083	9/4/2012	Email; Subject: FW: URGENT: Actions this week - Wrapping Up			
2084	9/9/2012	Email; Subject: i need some direction			
2085	9/10/2012	Email; Subject: response to last submission			
2086	9/12/2012	Email; Subject: RE: DELIVERY			
2087	9/17/2012	Email; Subject: RE: Comments from OPG			
2088	9/17/2012	Email; Subject: are you around to take a call			
2089	9/18/2012	Email; Subject: Re: meeting today			
2090	9/18/2012	Email; Subject: RE: Comments			
2091	9/19/2012	Email; Subject: Call			
2092	9/19/2012	Email; Subject: FW: CONCERN			
2093	9/20/2012	Email; Subject: Re: Ukraine Yet Again			
2094	9/21/2012	Email; Subject: FW: meeting on Sunday			
2095	9/23/2012	Email; Subject: Re: Meeting tomorrow morning			
2096	9/24/2012	Email; Subject: RE: Post trial detention.			
2097	9/25/2012	Email; Subject: FW: Draft messaging			
2098	10/2/2012	Email; Subject: Re: Ukraine			
2099	10/2/2012	Email; Subject: FW:			
2100	10/2/2012	Email; Subject: another set of comments			
2101	10/3/2012	Email; Subject: Re: Call number for [Redacted] roundtable at 3pm: 202-296-9312			
2102	10/3/2012	Email; Subject: Fw: Ukraine			
2103	10/18/2012	Email; Subject: FW: The Report			
2104		[Exhibit Removed]			
2105	11/12/2012	Email; Subject: RE: Delivery			
2106	11/28/2012	Email; Subject: Greg's memo			
2107	12/6/2012	Email; Subject: FW: Updated Docs			
2108	12/11/2012	Email; Subject: Re: Ukraine			
2109	12/11/2012	Email; Subject: Re: Ukraine			
2110	12/11/2012	Email; Subject: FW: Greg Craig			
2111	12/11/2012	Email; Subject: RE: Sanger conversation			
2112	12/11/2012	Email; Subject: Re: Report on the Tymoshenko case			
2113	12/11/2012	Email; Subject: Re: Report on the Tymoshenko case			
2114	12/11/2012	Email; Subject: RE: Meeting Aleksander Kwasniewski			
2115	12/12/2012	Email; Subject: Re: AK - Talking Points			
2116	12/12/2012	Email; Subject: Re: Report on the Tymoshenko case			
2117	12/12/2012	Email; Subject: hello and questions, from NYT Moscow			
2118	12/12/2012	Email; Subject: Re: Report on the Tymoshenko case			
2119	12/12/2012	Email; Subject: RE: Ukraine			

Ex. No.	Date	Description	Obj.	Off'd	Adm.
2120	12/13/2012	Email; Subject: FW: On Behalf of Greg Craig - The Tymoshenko Case			
2121	12/13/2012	Email; Subject: On Behalf of Greg Craig - The Tymoshenko Case			
2122	12/13/2012	Email; Subject: RE: On Behalf of Greg Craig - The Tymoshenko Case			
2123	1/8/2013	Email; Subject: Re: Meeting Tomorrow			
2124	12/12/2012	News Article; Failings Found in Trial of Ukrainian Ex-Premier			
2125	12/11/2012	Email; Subject: RE: Electronic delivery			
2126	2012-2017	Trust Detail Inquiry; Client: Ministry of Justice, Gov of Ukraine; Wire Records			
2127	2012-2013	Skadden Invoices			
503-M 505-M 517-M 539-M 594-M 602-M 604-M 606-M 613-M 616-M 617-M 690-M 691-M 692-M 694-M 696-M 697-M 705-M 706-M 708-M 710-M 712-M 714-M		Metadata			
569-T 570-T 592-T 610-T 716-T 719-T		Translations			

EXHIBIT F

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING \$500,000 WIRE

The parties stipulate to the following facts:

1. Marc Baldinger previously owned Aegis Holdings, LLC, which provided investment advice.
2. In 2013, Paul J. Manafort, Jr., through an entity he controlled named LilRed, LLC, made various investments through Aegis Holdings, LLC, totaling approximately \$1,500,000.
3. On September 4, 2013, at 10:43 AM, Marc Baldinger sent an email to Mr. Manafort inquiring about a \$500,000 payment noting: "Please let me know when you have attempted to wire the funds and I will look out for it." Mr. Manafort sent an email in response on September 4, 2013, at 10:44 AM, and noted, "they should be in your account today. Coming from global endeavor LTD."
4. On September 3, 2013, \$500,000 was transferred from Global Endeavour Inc.'s bank account at Loyal Bank in Kingstown, Saint Vincent and the Grenadines, to an account of Aegis Holdings, LLC.

5. The record attached as Exhibit A hereto is a record of Aegis Holdings, LLC, and constitutes a record of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING PURCHASE OF AUDIO/VISUAL,
LIGHTING, AND NETWORK CONTROL SYSTEMS AND SERVICE**

The parties stipulate to the following facts:

1. Joel Maxwell is the Chief Operating Officer of Big Picture Solutions, Inc. (BPS), which operates in the Jupiter, Florida area.
2. Paul J. Manafort, Jr. had been a client of BPS since approximately 2011. BPS initially installed the audio visual and lighting control systems at Manafort's residence at 10 St. James Drive, Palm Beach Gardens, Florida. BPS later performed services at Manafort's Mount Vernon, Arlington, Bridgehampton, and Trump Tower residences.
3. Between October 27, 2011, and December 22, 2014, BPS submitted the following invoices totaling \$2,232,423.90, for audio visual, lighting control, and network system design and installation:

Date	Number	Amount
10/27/2011	1243	\$ 34,153.20
11/10/2011	1244	\$ 32,380.00
TOTAL:		\$ 66,533.20

Date	Number	Amount
10/24/2012	1292	\$ 52,930.01
10/24/2012	1293	\$ 44,496.92
10/24/2012	1294	\$ 105,860.01
10/24/2012	1295	\$ 88,993.83
12/11/2012	1299	\$ 45,144.91
12/11/2012	1300	\$ 53,217.52
12/11/2012	1301	\$ 62,236.95
12/11/2012	1302	\$ 2,337.02
TOTAL:		\$ 455,217.17
1/10/2013	1303	\$ 15,539.66
1/10/2013	1304	\$ 79,072.90
1/10/2013	1305	\$ 82,169.01
1/10/2013	1306	\$ 17,643.33
1/12/2013	1307	\$ 6,358.86
1/27/2013	1310	\$ 51,638.66
1/29/2013	1311	\$ 29,112.84
2/4/2013	1313	\$ 40,838.94
2/4/2013	1314	\$ 53,019.58
2/4/2013	1317	\$ 376,659.94
3/1/2013	1318	\$ 7,900.00
3/15/2013	1380	\$ 83,447.29
4/21/2013	1345	\$ 31,294.12
5/1/2013	1335	\$ 23,681.66
5/10/2013	1334	\$ 80,640.74
6/26/2013	1337	\$ 83,415.06
6/26/2013	1339	\$ 92,217.50
7/25/2013	1341	\$ 4,446.46
7/25/2013	1342	\$ 25,932.75
7/25/2013	1343	\$ 25,049.68
7/26/2013	1338	\$ 94,092.75

Date	Number	Amount
8/1/2013	1346	\$ 7,000.00
8/1/2013	1347	\$ 13,060.33
8/2/2013	1348	\$ 3,288.01
8/17/2013	1349	\$ 26,599.64
8/31/2013	1352	\$ 5,775.23
10/1/2013	1356	\$ 2,407.73
10/10/2013	1357	\$ 41,302.90
11/18/2013	1371	\$ 3,396.00
12/14/2013	1374	\$ 5,000.00
12/14/2013	1375	\$ 6,699.20
TOTAL:		\$ 1,418,700.77
1/23/2014	1377	\$ 2,900.00
3/2/2014	114114	\$ 29,000.00
4/19/2014	114020	\$ 16,873.07
4/28/2014	114006	\$ 106,650.80
4/29/2014	114030	\$ 26,037.84
5/5/2014	114029	\$ 13,634.25
5/30/2014	114036	\$ 17,685.29
5/30/2014	114037	\$ 15,521.84
5/30/2014	114038	\$ 29,407.72
7/1/2014	114044	\$ 4,945.00
7/1/2014	114045	\$ 3,704.70
7/1/2014	114046	\$ 8,162.00
11/16/2014	114080	\$ 13,674.00
12/22/2014	114095	\$ 3,776.25
TOTAL:		\$ 291,972.76
TOTAL AMOUNT INVOICED BY BPS:		\$ 2,232,423.90

4. Between March 22, 2011, and June 20, 2014, BPS received \$1,661,201.00 from foreign accounts as payment for these services:

Foreign Account	Date	Amount
Leviathan Advisors Limited	3/22/2011	\$ 12,000.00
Leviathan Advisors Limited	3/28/2011	\$ 25,000.00
Leviathan Advisors Limited	4/27/2011	\$ 12,000.00
Leviathan Advisors Limited	5/16/2011	\$ 25,000.00
Global Highway Limited	11/15/2011	\$ 17,006.00
Global Highway Limited	11/23/2011	\$ 11,000.00
TOTAL:		\$ 102,006.00
Global Highway Limited	2/28/2012	\$ 6,200.00
Lucicle Consultants Limited	10/31/2012	\$ 290,000.00
Lucicle Consultants Limited	12/17/2012	\$ 160,600.00
TOTAL:		\$ 456,800.00
Lucicle Consultants Limited	1/15/2013	\$ 194,000.00
Lucicle Consultants Limited	1/24/2013	\$ 6,300.00
Lucicle Consultants Limited	2/12/2013	\$ 51,600.00
Lucicle Consultants Limited	2/26/2013	\$ 260,000.00
Pompolo Limited	7/15/2013	\$ 175,575.00
Global Endeavour Inc.	8/28/2013	\$ 179,000.00
Global Endeavour Inc.	10/31/2013	\$ 73,000.00
TOTAL:		\$ 939,475.00
Global Endeavour Inc.	5/23/2014	\$ 99,960.00
Global Endeavour Inc.	6/20/2014	\$ 62,960.00
TOTAL:		\$ 162,920.00
TOTAL FOREIGN PAYMENTS TO BPS:		\$ 1,661,201.00

5. The records attached to this stipulation as Exhibit A are records of BPS, and constitute records of a regularly conducted business activity pursuant to Rule

803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

- a. Exhibit A are invoices totaling \$2,232,423.90, submitted by BPS from October 27, 2011, and December 22, 2014, for audio visual, lighting control, and network system design and installation.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Jeannie S. Rhee
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING EMAIL

The parties stipulate to the following facts:

1. The defendant, Paul J. Manafort, Jr., was the person who was the assigned subscriber of the following email accounts: pmanafort@dmpint.com, pm22314@gmail.com, and pmanafort@davismanafort.com.
2. With respect to all emails introduced at trial, which had previously been produced by the United States to the defense as part of the discovery process:
 - a. The emails are authentic and no further testimony is necessary to establish their authenticity.
 - b. The emails were authored and sent from the email account listed on the particular emails.
 - c. The emails were received by the recipient(s) on the particular emails.
 - d. The emails were sent on the date listed on the emails.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING BUSINESS RECORDS OF FBC

The parties stipulate to the authenticity of the categories of records listed below in numbered paragraphs 1 and 2, which had previously been produced by the United States to the defense as part of the discovery process, and further agree that they constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

1. Records of FBC.

2. The records referenced in paragraph 1 include, but are not limited to, emails, checks, wire transfers, invoices, agreements, correspondence, work papers, financial statements, authorization forms, permanent files, and contracts.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING OUTDOOR LIVING DESIGN AND
CONSTRUCTION FOR ARLINGTON, VIRGINIA RESIDENCE**

The parties stipulate to the following facts:

1. Douglas DeLuca is the founder and CEO of Federal Stone and Brick, LLC, which is a landscape and outdoor living design and construction company that operates in the Northern Virginia area.
2. On October 26, 2012, at 10:48 AM, Paul J. Manafort, Jr. sent Deluca an email stating that Andrea Manafort was pleased with the interaction with DeLuca. Manafort also wrote, "As we move to the next phase, you will be interacting with me... On matters of design, you will deal with Andrea. On matters of contract and budget you will deal with me." DeLuca mainly communicated with Manafort via email.
3. On November 19, 2012, at 3:13 PM, Manafort sent DeLuca an email with the signed contract noting, "You will be receiving a wire from Lucile LLC in the next 2 days for \$45,000."

4. On November 19, 2012, Federal Stone and Brick, LLC entered into a contract with Manafort with respect to the design and construction of an outdoor living space at Andrea Manafort's home on 1041 N. Edgewood Street in Arlington, Virginia. The contract price for the work was \$104,424.
5. As part of the payment for that design and construction, on November 20, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$45,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to an account of Federal Stone and Brick, LLC.
6. As a further part of the payment for that design and construction, on December 7, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$21,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to an account of Federal Stone and Brick, LLC.
7. As a further part of the payment for that design and construction, on December 17, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$21,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to an account of Federal Stone and Brick, LLC.
8. As a further part of the payment for that design and construction, on January 17, 2013, a wire transfer was made from Lucicle Consultants Limited in the amount of \$18,750 from a bank account at Laiki Bank in Nicosia, Cyprus to an account of Federal Stone and Brick, LLC.
9. As a further part of the payment for that design and construction, on January 29, 2013, a wire transfer was made from Lucicle Consultants Limited in the

amount of \$9,400 from a bank account at Hellenic Bank in Nicosia, Cyprus to an account of Federal Stone and Brick, LLC.

10. As a further part of the payment for that design and construction, on February 12, 2013, a wire transfer was made from Lucicle Consultants Limited in the amount of \$10,500 from a bank account at Hellenic Bank in Nicosia, Cyprus to an account of Federal Stone and Brick, LLC.
11. DeLuca never had contact with Richard Gates regarding any aspect of the project, contract, billings, or payments.
12. The records attached to this stipulation as Exhibit A through C are records of Federal Stone and Brick, LLC, and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.
 - a. Exhibit A is a copy of an email with the outdoor living design and construction contract attached, dated November 19, 2012, between Federal Stone and Brick, LLC and Paul Manafort.
 - b. Exhibit B is a copy of an email between Paul Manafort and Doug DeLuca dated October 26, 2012.
 - c. Exhibit C is photographs of the property located at 1041 N. Edgewood Street in Arlington, Virginia.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Jeannie S. Rhee
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING BUSINESS RECORDS
OF FINANCIAL INSTITUTIONS**

The parties stipulate to the authenticity of the categories of records listed below in numbered paragraphs 1 and 2, which had previously been produced by the United States to the defense as part of the discovery process, and further agree that they constitute records of a regularly conduct business activity pursuant to Rule 803(6) of the Federal Rules of evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

1. Records of American Express, Anchor Commercial Bank, Bank of America, Barclays, Banc of California, BB&T, Bridgehampton National Bank, Burke & Herbert Bank, Capital One, Charles Schwab, Citibank, Citigroup, Citizens Bank, City National Bank, Clearing House Interbank Payments System, Colony Northstar, Inc., Deutsche Bank, Eagle Bank, Fedwire, First Republic Bank, First Republic Investment Management, Genesis Capital LLC, Goldman Sachs, HSBC Bank USA, Hudson City Savings Bank, JPMorgan Chase Bank, M&T Bank, Merrill Lynch, Metropolitan Commercial Bank, Morgan Stanley, Northwestern Mutual,

People's United Bank, Pershing LLC, PNC Bank, Seacoast Bank, SIII Capital Group, Standard Chartered Bank, SunTrust Bank, TD Bank, The Federal Savings Bank, UBS Financial Services Inc., United Bank, Wachovia Bank, Wells Fargo Bank.

2. The records referenced in paragraph 1 include, but are not limited to, emails, account statements, checks, wire transfers, loan files, credit files, credit reports, transactions forms, underwriting records, applications, closing files, signature cards, invoices, agreements, deposits slips and corresponding offsets, and correspondence.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING PURCHASE OF THE PROPERTY LOCATED
AT 377 UNION STREET, BROOKLYN, NEW YORK (“377 UNION STREET”)**

The parties stipulate to the following facts:

1. First Nationwide Title Agency settled the purchase of 377 Union Street on December 28, 2012.
2. On November 14, 2012, MC Brooklyn Holdings, LLC entered into a residential contract of sale for the purchase of real property at 377 Union Street, Brooklyn, New York. The purchase price was \$2,995,000. The down payment was \$299,500.
3. As payment for the down payment of \$299,500, on November 20, 2012, a wire transfer from Lucicle Consultants Limited in the amount of \$299,500 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to the attorney trust account of Michele Scotto, Esq., in her capacity as the attorney for the seller.

4. On December 27, 2012, Jessica Manafort as a member of MC Brooklyn Holdings, LLC, designated Bruce Baldinger, Esq., as an agent of MC Brooklyn Holdings, LLC.
5. As payment for the remainder due for the purchase of 377 Union Street, on December 27, 2012, Bruce Baldinger, on behalf of MC Brooklyn Holdings, LLC, transferred \$2,800,000 from his law firm's bank account at TD Bank to First Nationwide Title Agency, LLC. On December 28, 2012, First Nationwide Title Agency, LLC conducted the settlement, that is the sale, of MC Brooklyn Holdings, LLC's purchase of the 377 Union Street.
6. The records attached to this stipulation as Exhibits A through B are records of First Nationwide Title Agency and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.
 - a. Exhibit A is a copy of the residential contract of sale for 377 Union Street dated November 14, 2012.
 - b. Exhibit B is a copy of the real property transfer of 377 Union Street dated December 28, 2012.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING BUSINESS RECORDS OF FTI CONSULTING

The parties stipulate to the authenticity of the categories of records listed below in numbered paragraphs 1 and 2, which had previously been produced by the United States to the defense as part of the discovery process, and further agree that they constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

1. Records of FTI Consulting.

2. The records referenced in paragraph 1 include, but are not limited to, emails, checks, wire transfers, invoices, agreements, correspondence, work papers, financial statements, authorization forms, permanent files, and contracts.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING ORIENTAL RUG PURCHASES

The parties stipulate to the following facts:

1. Joshua Nabatkhorian is an owner of J&J Oriental Rug Gallery, which sells and repairs oriental rugs, and is located in Alexandria, Virginia.
2. On March 19, 2010, J&J Oriental Rug Gallery submitted to Paul J. Manafort, Jr., invoice 25819 in the amount of \$160,000 for two silk rugs.
3. On March 31, 2010, a wire transfer from Yiakora Ventures Limited in the amount of \$140,000 drawn on a bank account at the Bank of Cyprus in Nicosia, Cyprus was sent to J&J Oriental Rug Gallery.
4. On June 10, 2010, J&J Oriental Rug Gallery and Jesand Investment Corporation, through Mr. Manafort, entered into a loan agreement. Jesand Investment Corporation agreed to loan J&J Oriental Rug Gallery \$250,000 for investment in oriental rugs in exchange for 40% of the profit on any sale of rugs and \$500,000 of oriental rugs as collateral.

5. On June 16, 2010, a wire transfer from Global Highway Limited in the amount of \$250,000 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to J&J Oriental Rug Gallery.

6. In or around February 2012, Nabatkhorian called Mr. Manafort to request that Mr. Manafort pay all of his outstanding invoices with J&J Oriental Rug Gallery. Mr. Manafort offered \$100,000 as payment in full for all outstanding invoices, which Nabatkhorian accepted.

7. On February 28, 2012, a wire transfer from Global Highway Limited in the amount of \$100,000 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to Natalie Nabatkhorian, who is Nabatkhorian's wife.

8. The records attached to this stipulation as Exhibits A through B are records of J&J Oriental Rug Gallery and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

- a. Exhibit A is a copy of invoice 25819 in the amount of \$160,000 for two silk rugs.
- b. Exhibit B is a copy of the loan agreement dated June 10, 2010.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING PURCHASE OF 29 HOWARD STREET #4,
NEW YORK, NEW YORK (“HOWARD STREET”)**

The parties stipulate to the following facts:

1. On January 26, 2012, Jessica Manafort, Kathleen Manafort, and Paul J. Manafort, Jr., entered into a contract of sale for the purchase of real property known as 29 Howard Street. The purchase price was \$2,850,000. On January 24, 2012, a wire transfer in the amount of \$285,000, representing the down payment for 29 Howard Street, was sent from Paul and Kathleen Manafort’s account at First Republic Bank to the seller’s attorney.
2. On February 14, 2012, Kensington Vanguard National Land Services of New York, LLC (“Kensington Vanguard”) conducted the settlement, that is the sale, of Howard Street to MC Soho Holdings, LLC.
3. As payment for the purchase of Howard Street, on February 10, 2012, MC Soho Holdings, LLC transferred \$2,650,000 to Kensington Vanguard.

4. MC Soho Holdings, LLC was a Florida Limited Liability Company formed on January 15, 2012. The registered agent and managing member of MC Soho Holdings, LLC was Paul Manafort

5. The records attached to this stipulation as Exhibits A through F are records of Kensington Vanguard and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

- a. Exhibit A is a copy of the contract of sale for 29 Howard Street dated January 26, 2012.
- b. Exhibit B is a copy of the wire transfer in the amount of \$285,000 from Paul and Kathleen Manafort to the seller's attorney on January 24, 2012.
- c. Exhibit C is a copy of the real property transfer for 29 Howard Street dated February 14, 2012.
- d. Exhibit D is a copy of the ledger balance report reflecting the transfer of \$2,650,000 from MC Soho Holdings, LLC to Kensington Vanguard.
- e. Exhibit E is a copy of the Electronic Articles of Organization for MC Soho Holdings, LLC.
- f. Exhibit F is a copy of an email chain dated February 13, 2012, concerning the wiring of funds for the sale of 29 Howard Street.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING PURCHASE OF
1046 N. EDGEWOOD STREET, ARLINGTON, VA (“EDGEWOOD”)**

The parties stipulate to the following facts:

1. Land, Carroll & Blair, P.C., is a law firm specializing in, among other things, real estate and land use. On August 21, 2012, Andrea Manafort entered into a sales contract for the purchase of real property know as Edgewood. The purchase price was \$1,899,000. The same day Andrea Manafort wrote a \$50,000 check to her realtor as earnest money deposit for Edgewood.
2. On September 10, 2012, Andrea Manafort purchased Edgewood.
3. To pay for Edgewood, on August 31, 2012, a wire transfer in the amount of \$1,900,000 was sent from Lucicle Consultants Limited’s bank account at Marfin Laiki Bank in Nicosia, Cyprus to an account of Land, Carroll & Blair, P.C.
4. According to instructions from Paul J. Manafort, Jr., at closing the settlement company issued a \$23,001.36 check to Andrea Manafort representing excess funds from the \$1,900,000 wire transfer.

5. The records attached to this stipulation as Exhibits A through D are records of Land, Carroll & Blair, P.C. and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

- a. Exhibit A is a copy of the Edgewood sales contract dated August 21, 2012.
- b. Exhibits B and C are a copy of the Edgewood HUD-1 settlement statement and the real property transfer dated September 11, 2012.
- c. Exhibit D is a copy of the Edgewood disbursement statement.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING 2012 LAND ROVER
PURCHASES AND LEASE**

The parties stipulate to the following facts:

1. On April 11, 2012, Paul and Andrea Manafort purchased a 2012 Land Rover Range Rover from Don Beyer Motors, Inc., also known as Land Rover of Alexandria.
2. As part of the payment for that vehicle, on April 12, 2012, a wire transfer from Lucicle Consultants Limited in the amount of \$83,525.00 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to Don Beyer Motors, Inc.
3. On April 25, 2012, Paul and Kathleen Manafort leased a 2012 Land Rover Range Rover.
4. As the down-payment for that vehicle, on May 2, 2012, a wire transfer from Lucicle Consultants Limited in the amount of \$12,525.00 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to Don Beyer Motors, Inc.
5. On June 28, 2012, Paul and Kathleen Manafort, using company John Hannah, LLC, purchased a 2012 Land Rover Range Rover.

6. As part of the payment for that vehicle, on June 29, 2012, a wire transfer from Lucicle Consultants Limited in the amount of \$67,655.00 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to Don Beyer Motors, Inc.

7. The records attached to this stipulation as Exhibits A through C are records of Don Beyer Motors, Inc. and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

a. Exhibit A is a copy of documents reflecting the purchase of the 2012 Land Rover Range Rover on April 11, 2012.

b. Exhibit B is a copy of documents reflecting the April 25, 2012, lease of the 2012 Land Rover.

c. Exhibit C is a copy of documents reflecting the purchase of the 2012 Land Rover Range Rover on June 28, 2012.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING BUSINESS RECORDS OF MERCEDES-BENZ

The parties stipulate that the records attached as Exhibit A are records of American Service Center Associates of Alexandria, LLC, also known as Mercedes-Benz of Alexandria – a car dealership – and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING BUSINESS RECORDS OF MERCURY

The parties stipulate to the authenticity of the categories of records listed below in numbered paragraphs 1 and 2, which had previously been produced by the United States to the defense as part of the discovery process, and further agree that they constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

1. Records of Mercury Public Affairs.

2. The records referenced in paragraph 1 include, but are not limited to, emails, checks, wire transfers, invoices, agreements, correspondence, work papers, financial statements, authorization forms, permanent files, and contracts.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING BUSINESS RECORDS OF PODESTA GROUP

The parties stipulate to the authenticity of the categories of records listed below in numbered paragraphs 1 and 2, which had previously been produced by the United States to the defense as part of the discovery process, and further agree that they constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

1. Records of the Podesta Group.

2. The records referenced in paragraph 1 include, but are not limited to, emails, checks, wire transfers, invoices, agreements, correspondence, work papers, financial statements, authorization forms, permanent files, and contracts.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING RENOVATION OF
PALM BEACH GARDENS, FLORIDA RESIDENCE**

The parties stipulate to the following facts:

1. Carl Sabatello is the President of Sabatello Construction of Florida, Inc., which is a construction company that operates in the Palm Beach, Florida area.
2. On November 14, 2011, Sabatello Construction of Florida, Inc. entered into a contract with Paul J. Manafort, Jr., and Kathleen Manafort with respect to the renovation of their master bathroom at their home on 10 St. James Drive in Palm Beach Gardens, Florida. The contract price for the work was \$38,475.
3. As part of the payment for that renovation, on November 15, 2011, a wire transfer was made from Global Highway Limited in the amount of \$8,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to an account of Sabatello Construction of Florida, Inc.

4. As a further part of the payment for that renovation, on December 5, 2011, a wire transfer was made from Leviathan Advisors Limited in the amount of \$11,237 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to an account of Sabatello Construction of Florida, Inc.
5. As a further part of the payment for that renovation, on December 21, 2011, a wire transfer was made from Black Sea View Limited in the amount of \$20,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
6. On February 4, 2012, Sabatello Construction of Florida, Inc. entered into an additional contract with Paul and Kathleen Manafort with respect to remodeling the master bathroom and construction of an addition to the guest house at their home on 10 St. James Drive in Palm Beach Gardens, Florida. The contract price for the work was \$259,300.
7. With respect to the February 4, 2012 contract, there were nine change orders reflecting additional work agreed to and signed by Sabatello Construction of Florida, Inc. and Mr. Manafort. The total cost associated with these change orders was \$133,941.
8. As part of the payment for the February 4, 2012, contract and the nine change orders, the following payments were made:
 - a. On February 9, 2012, a wire transfer was made from Global Highway Limited in the amount of \$51,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.

- b. On May 17, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$68,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- c. On June 19, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$60,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- d. On July 18, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$32,250 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- e. On September 19, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$112,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- f. On November 30, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$39,700 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- g. On January 9, 2013, a wire transfer was made from Lucicle Consultants Limited in the amount of \$25,600 from a bank account at Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.

- h. On February 28, 2013, a wire transfer was made from Lucicle Consultants Limited in the amount of \$4,700 from a bank account at Hellenic Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- 9. The records attached to this stipulation as Exhibits A through D are records of Sabatello Construction of Florida, Inc., and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.
 - a. Exhibit A is a copy of the construction contract dated November 14, 2011, between Sabatello Construction of Florida, Inc. and Paul and Kathleen Manafort.
 - b. Exhibit B is a copy of the additional construction contract between Sabatello Construction of Florida, Inc. and Paul and Kathleen Manafort dated February 4, 2012.
 - c. Exhibit C are copies of the nine change orders referenced in paragraph 7.
 - d. Exhibit D are photographs of the property located at 10 St. James Drive in Palm Beach Gardens, Florida.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING PURCHASE OF
AUDIO/VISUAL SYSTEM AND SERVICE**

The parties stipulate to the following facts:

1. Greg Garland was the co-owner of Sensoryphile, Inc., which operates in the Hamptons, New York area.
2. Paul J. Manafort, Jr. had been a client of Sensoryphile, Inc. since approximately 1994. Sensoryphile, Inc. installed the original audio visual/video system and karaoke system at Manafort's residence at 174 Jobs Lane, Bridgehampton, New York.
3. On March 1, 2010, Sensoryphile, Inc. submitted invoice number 76381 in the amount of \$20,339 for Crestron design and installation.
4. As payment of that invoice, on March 8, 2010, Global Highway Limited transferred \$20,300 from its bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sensoryphile, Inc.

5. On April 15, 2010, Sensoryphile, Inc. submitted invoice number 76526REV2 in the amount of \$8,147 for deposit on a Karaoke machine and audio/video design and installation.
6. As payment of that invoice, on April 23, 2010, Yiakora Ventures Limited transferred \$8,500 from its bank account at Bank of Cyprus in Nicosia, Cyprus to Sensoryphile, Inc.
7. On July 13, 2010, Sensoryphile, Inc. submitted invoice number 76836 in the amount of \$10,395 for a Karaoke machine and audio/video design and installation.
8. On July 15, 2010, Sensoryphile, Inc. submitted invoice number 76838 in the amount of \$7,574 for Crestron design and installation and televisions.
9. As payment of both invoices, on July 29, 2010, Leviathan Advisors Limited transferred \$17,650 from its bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sensoryphile, Inc.
10. The records attached to this stipulation as Exhibits A through D are records of Sensoryphile, Inc., and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.
 - a. Exhibit A is copy of invoice number 76381 in the amount of \$20,339 for Crestron design and installation.

- b. Exhibit B is a copy of invoice number 76526REV2 in the amount of \$8,147 for deposit on a Karaoke machine and audio/video design and installation.
- c. Exhibit C is a copy of invoice number 76836 in the amount of \$10,395 for a Karaoke machine and audio/video design and installation.
- d. Exhibit D is a copy of invoice number 76838 in the amount of \$7,574 for Crestron design and installation and televisions.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING PURCHASE OF
AUDIO/VISUAL SYSTEM AND SERVICE**

The parties stipulate to the following facts:

1. Greg Garland was the co-owner of Sensoryphile, Inc., which operates in the Hamptons, New York area.
2. Paul J. Manafort, Jr. had been a client of Sensoryphile, Inc. since approximately 1994. Sensoryphile, Inc. installed the original audio visual/video system and karaoke system at Manafort's residence at 174 Jobs Lane, Bridgehampton, New York.
3. On March 1, 2010, Sensoryphile, Inc. submitted invoice number 76381 in the amount of \$20,339 for Crestron design and installation.
4. As payment of that invoice, on March 8, 2010, Global Highway Limited transferred \$20,300 from its bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sensoryphile, Inc.

5. On April 15, 2010, Sensoryphile, Inc. submitted invoice number 76526REV2 in the amount of \$8,147 for deposit on a Karaoke machine and audio/video design and installation.
6. As payment of that invoice, on April 23, 2010, Yiakora Ventures Limited transferred \$8,500 from its bank account at Bank of Cyprus in Nicosia, Cyprus to Sensoryphile, Inc.
7. On July 13, 2010, Sensoryphile, Inc. submitted invoice number 76836 in the amount of \$10,395 for a Karaoke machine and audio/video design and installation.
8. On July 15, 2010, Sensoryphile, Inc. submitted invoice number 76838 in the amount of \$7,574 for Crestron design and installation and televisions.
9. As payment of both invoices, on July 29, 2010, Leviathan Advisors Limited transferred \$17,650 from its bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sensoryphile, Inc.
10. The records attached to this stipulation as Exhibits A through D are records of Sensoryphile, Inc., and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.
 - a. Exhibit A is copy of invoice number 76381 in the amount of \$20,339 for Crestron design and installation.

- b. Exhibit B is a copy of invoice number 76526REV2 in the amount of \$8,147 for deposit on a Karaoke machine and audio/video design and installation.
- c. Exhibit C is a copy of invoice number 76836 in the amount of \$10,395 for a Karaoke machine and audio/video design and installation.
- d. Exhibit D is a copy of invoice number 76838 in the amount of \$7,574 for Crestron design and installation and televisions.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING BUSINESS RECORDS OF SKADDEN ARPS

The parties stipulate to the authenticity of the categories of records listed below in numbered paragraphs 1 and 2, which had previously been produced by the United States to the defense as part of the discovery process, and further agree that they constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

1. Records of Skadden, Arps, Slate, Meagher & Flom LLP.
2. The records referenced in paragraph 1 include, but are not limited to, emails, checks, wire transfers, invoices, agreements, correspondence, work papers, financial statements, authorization forms, permanent files, and contracts.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING BUSINESS RECORDS OF
BOOKKEEPING AND TAX PREPARATION SERVICES**

The parties stipulate to the authenticity of the categories of records listed below in numbered paragraphs 1 and 2, which had previously been produced by the United States to the defense as part of the discovery process, and further agree that they constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

1. Records of Nigro Karlin Segal Feldstein & Bolno, LLC (NKSFB) and Kositzka, Wicks & Company (KWC).
2. The records referenced in paragraph 1 include, but are not limited to, emails, account statements, checks, wire transfers, loan files, transactions forms, applications, closing files, signature cards, invoices, agreements, deposits slips and corresponding offsets, correspondence, work papers, financial statements, general ledgers, trial balances, adjusting journal entries and supporting documentation, tax

returns and supporting documents, authorization forms, permanent files, and contracts.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING TAX RETURNS

The parties stipulate to the following:

1. The federal tax returns listed below and attached as Exhibit A were each filed with the Internal Revenue Service:
 - Form 1040 tax returns for Paul and Kathleen Manafort for years 2010–2014.
 - Form 1120S tax returns for Davis Manafort Partners, Inc. for years 2010–2011.
 - Form 1065 tax returns for DMP International LLC for years 2011–2014.
 - Form 1065 tax returns for John Hannah for years 2010–2014.
 - Form 1065 tax returns for MC Soho Holdings LLC for years 2015–2016.
2. There were no tax returns filed with the Internal Revenue Service for MC Brooklyn Holdings LLC or Smythson.

3. There were no tax returns filed with the Internal Revenue Service for Davis Manafort Partners, Inc. for years 2012–2014.

4. There were no tax returns filed with the Internal Revenue Service for DMP International LLC for year 2010.

5. There were no tax returns filed with the Internal Revenue Service for MC Soho Holdings LLC for years 2013–2014.

6. The federal tax returns and certifications attached as Exhibit A constitute public records and/or reports and are therefore self-authenticating under Federal Rules of Evidence 803(6), 803(8), 803(10), and 902, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING RECORDS OF ANDREW WRIGHT

The parties stipulate to the following facts:

1. Andrew Wright was an employee of Mercury Group and was the assigned subscriber of the following email account: andrew.wright.t@gmail.com.
2. The records attached to this stipulation as Exhibit A are records produced by Andrew Wright and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING RECORDS OF DANIEL J. EDELMAN, INC.

The parties stipulate to the authenticity of the categories of records listed below in numbered paragraphs 1 and 2, which had previously been produced by the United States to the defense as part of the discovery process, and further agree that they constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

1. Records of Daniel J. Edelman, Inc. d/b/a Edelman.
2. The records referenced in paragraph 1 include, but are not limited to, emails, memoranda, correspondence, work papers, financial statements, reports, notes, and a FARA registration submitted by Edelman.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING EMAIL

The parties stipulate to the following facts:

1. Konstantin Kilimnik was the person who was the assigned user of the following email account: kkilimnik@dmpint.com.

2. Oleg Voloshyn was the person who was the assigned subscriber of the following email account: oavoloshyn@gmail.com.

3. Vladimir Tolmach was the person who was the assigned subscriber of the following email account: vlad.tolmach@gmail.com.

4. Ina Kirsch-Vandewater was the person who was the assigned subscriber of the following email account: ina.kirschvandewater@gmail.com.

5. With respect to all emails introduced at trial, which had previously been produced by the United States to the defense as part of the discovery process:

a. The emails are authentic and no further testimony is necessary to establish their authenticity.

b. The emails were authored and sent from the email account listed on the particular emails.

- c. The emails were received by the recipient(s) on the particular emails.
- d. The emails were sent on the date listed on the emails.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

STIPULATION REGARDING RECORDS OF JADEROQ, LLC

The parties stipulate to the authenticity of the categories of records listed below in numbered paragraphs 1 and 2, which had previously been produced by the United States to the defense as part of the discovery process, and further agree that they constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

1. Records of JadeRoq, LLC.
2. The records referenced in paragraph 1 include, but are not limited to, emails, memoranda, correspondence, work papers, financial statements, reports, and notes.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Senior Assistant Special Counsels

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Case No. 17-cr-201-1 (ABJ)

**STIPULATION REGARDING PURCHASE OF
1046 N. EDGEWOOD STREET, ARLINGTON, VA**

The parties stipulate to the following facts:

1. Wayne Holland was a licensed real estate agent with McEneaney Associates Inc., a real estate company located in Alexandria, Virginia.
2. Holland was hired by Paul J. Manafort, Jr. to assist his daughter, Andrea Manafort, with the purchase of real property known as 1046 N. Edgewood Street, Arlington, VA. Manafort told Holland the purchase was going to be an all cash purchase, and directed Holland to submit an asking price offer to the seller's broker. The asking price for the property was \$1,899,000. The offer was then accepted by the seller.
3. On August 21, 2012, Andrea Manafort entered into a sales contract. The same day Andrea Manafort wrote a \$50,000 check to Holland as earnest money deposit for the property.

4. On August 30, 2012 at 2:33 PM, Manafort emailed Holland and stated that, “\$1.9M should be in your escrow account tomorrow morning. It is coming from Lucille LLC.”

5. To pay for the property, on August 31, 2012, a wire transfer in the amount of \$1,900,000 was sent from Lucicle Consultants Limited’s bank account at Marfin Laiki Bank in Nicosia, Cyprus to an account of Land, Carroll & Blair, P.C.

6. According to instructions from Manafort, at closing the settlement company was to issue excess funds from the \$1,900,000 wire transfer to Andrea Manafort.

7. The records attached to this stipulation as Exhibits A through D are records of McEneaney Associates Inc. and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

a. Exhibit A is a copy of the sales contract dated August 21, 2012.

b. Exhibit B is a copy of the earnest money deposit dated August 21, 2012.

c. Exhibit C is a copy of the email between Manafort and Holland dated August 30, 2012.

d. Exhibit D is a copy of the email between Manafort and Holland dated August 31, 2012.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By: _____
Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By: _____
Andrew Weissmann
Greg D. Andres
Jeannie S. Rhee
Senior Assistant Special Counsels

EXHIBIT G

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

Crim. No. 17-cr-201 (ABJ)

VERDICT FORM

COUNT 1 (Conspiracy against the United States):

As to Count 1 of the indictment, charging defendant Paul J. Manafort, Jr., with conspiracy to defraud the United States and commit an offense against the United States, we unanimously find the defendant:

Guilty _____ Not Guilty _____

(If your verdict as to Count 1 is not guilty, proceed immediately to Count 2. If your verdict as to Count 1 is guilty, complete the following section.)

With respect to Count 1, we unanimously find that the defendant conspired to (check all that apply):

- _____ Defraud the United States
- _____ Act as an unregistered agent of a foreign principal
- _____ Make false and misleading statements in connection with a Foreign Agent Registration Act (FARA) Filing
- _____ Make false statements to the government
- _____ Fail to file a report of foreign bank and financial account (FBAR)

COUNT 2 (Conspiracy to Launder Money):

As to Count 2 of the indictment, charging defendant Paul J. Manafort, Jr., with conspiracy to launder money, we unanimously find the defendant:

Guilty _____ Not Guilty _____

(If your verdict as to Count 2 is not guilty, proceed immediately to Count 3. If your verdict as to Count 2 is guilty, complete the following section.)

With respect to Count 2, we unanimously find that the defendant conspired to (check all that apply):

- _____ Transmit or transfer funds internationally to promote a specified unlawful activity, that is, a violation of FARA
- _____ Launder proceeds of a FARA violation in order to evade tax
- _____ Launder proceeds of a FARA violation in order to conceal their nature, location, source, ownership, or control

COUNT 3 (Unregistered Agent of a Foreign Principal):

As to Count 3 of the indictment, charging defendant Paul J. Manafort, Jr., with acting as an agent of a foreign principal without registering with the Department of Justice, we unanimously find the defendant:

Guilty _____ Not Guilty _____

COUNT 4 (False and Misleading FARA Statements):

As to Count 4 of the indictment, charging defendant Paul J. Manafort, Jr., with making a false or misleading statement in a document filed under the provisions of FARA and omitting a material fact necessary to make the statements in the document not misleading, we unanimously find the defendant:

Guilty _____ Not Guilty _____

COUNT 5 (False Statements):

As to Count 5 of the indictment, charging defendant Paul J. Manafort, Jr., with making a false statement, we unanimously find the defendant:

Guilty _____ Not Guilty _____

COUNT 6 (Attempted Witness Tampering):

As to Count 6 of the indictment, charging defendant Paul J. Manafort, Jr., with attempted witness tampering, we unanimously find the defendant:

Guilty _____ Not Guilty _____

COUNT 7 (Conspiracy to Witness Tamper):

As to Count 7 of the indictment, charging defendant Paul J. Manafort, Jr., with conspiracy to witness tamper, we unanimously find the defendant:

Guilty _____ Not Guilty _____