UNITED STATES DISTRICT COURT WESTERN DISTRICT OF OKLAHOMA

Case No.: CIV-18-1019-HE

CARTER PAGE,

Plaintiff,

-V-

DEMOCRATIC NATIONAL COMMITTEE; PERKINS COIE LLP; MARC ELIAS; AND MICHAEL SUSSMANN,

Defendants.

NOTICE OF SUPPLEMENTAL AUTHORITY: LETTER TO FBI DIRECTOR WRAY REGARDING PLAINTIFF'S DISCLOSURE OF INJURIES IN OKLAHOMA

In my January 22, 2019 Notice of Supplemental Authorities (Dkt. No. 27), I had respectfully notified the Court that "in the case of any remaining jurisdictional uncertainties, Plaintiff can make additional Oklahoma-specific information and/or an associated supplemental brief available upon the request of the Court; preferably under seal to protect the integrity of ongoing law enforcement investigations."

In Dkt. No. 28, Defendants had moved to strike this and other factual information presented by the Plaintiff in my preceding Notice as a means of allegedly covering up the Oklahoma-epicenter of their wrongdoing related to the torts in this civil action.

Whereas the Court's January 31, 2019 Order (Dkt. No. 29) did not address these pending filings and this related supplemental authority provided herein (*infra*) directly

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confirms how "the brunt of the injury would be felt in the forum state", (*Dudnikov v. Chalk & Vemillion Fine Arts, Inc.*, 514 F.3d 1063, 1072 (10th Cir. 2008)), I have attached my related letter to FBI Director Christopher A. Wray for reference as Exhibit 1.

February 4, 2019

Very respectfully,
By: /s/ Carter Page
Carter Page
c/o Global Natural Gas Ventures LLC
101 Park Ave., Suite 1300
Oklahoma City, OK 73102
Phone (405) 825-0172
Fax (405) 825-0177
cpage@globalenergycap.com

CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2019, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel registered for ECF.

Dated: February 4, 2019

Very respectfully,

By: /s/ Carter Page Carter Page c/o Global Natural Gas Ventures LLC 101 Park Ave., Suite 1300 Oklahoma City, OK 73102 Phone (405) 825-0172 Fax (405) 825-0177 cpage@globalenergycap.com

EXHIBIT 1

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GLOBAL NATURAL GAS VENTURES LLC

February 4, 2019

BY ELECTRONIC MAIL AND REGISTERED MAIL

The Honorable Christopher A. Wray Director of the Federal Bureau of Investigation 935 Pennsylvania Avenue, NW Washington, DC 20535

Subject: Request for disclosure of FBI information related to domestic terror threats and other Dossier-related damages in Oklahoma

Dear Director Wray:

I am writing to respectfully request the FBI's immediate production of all available records related to the extensive series of death threats which I have received originating from Oklahoma. Such records include, but are not limited to, any Form FD-302s from all of my many interviews related to these threats from Oklahoma. As per evidence I previously produced for the Bureau's Counterintelligence agents and as briefly recapped in this letter, these threats directly resulted from the false allegations in the DNC-funded Dossier disinformation campaign which the FBI supported in 2016. Amidst my many meetings with the Bureau's Counterintelligence Division in March 2017 that someone later illegally disclosed to the *Washington Posti*, I discussed these specific Oklahoma–related matters at length with the FBI agents. In response to my notification of these and other domestic terror threats (18 U.S.C. § 2331(5)) which originated in Oklahoma and to a lesser extent elsewhere, the agents reiterated to me in separate meetings on March 30 and March 31, 3017 that the appropriate Division within the FBI would look into it. To the contrary and after criminal leakers notified the media that I had supported the FBI as a confidential informant in prior years, the threats from Oklahoma continued on April 3, 2017 and persisted for over a half-year after that.

In my directly related civil action against the Democratic National Committee, Perkins Coie LLP, Marc Elias, and Michael Sussman, I am seeking justice for extensive Dossier damages (the "DNC Case", *Page v. DNC et al*, 18-cv-1019, W.D. Ok., October 15, 2018). But as I cautiously explained in a January 22, 2019 letter to the Chief Judge of the U.S. District Court for the Western District of Oklahoma, I did not want to publicly disclose this information in order to protect the integrity of any potential ongoing law enforcement investigation.ⁱⁱ Out of respect for the Bureau and in the hope that your organization might have recently begun taking steps to judiciously remedy the many offenses that the Democrats committed against me as part of their pursuit of damaging President Trumpⁱⁱⁱ, I prudently did not initially specify the Oklahoma-specific jurisdictional origins of these death threats and associated torts in my original DNC Case complaint. But consistent with the audio records that I provided to your FBI Counterintelligence Division colleagues in one of our meetings on March 30, 2017, I received the following voicemail from a 918 number (the area code for Tulsa and northeast Oklahoma). The reference to Rosneft in this recording on March 20, 2017 at 3:34 PM precisely matches the specific allegations that another senior Democrat, Adam Schiff, stated to your predecessor James Comey shortly beforehand, as broadcast on national television:

"We know what the fuck you've been doing, you piece of shit mother fucker. You think you're not, you know you're not in fucking in cahoots with fucking Rosneft and every fucking Russian oligarch over there? You fucking half-wit, fucking piece of shit. You deserve everything you fucking get. Every fucking thing you get. If it was up to me, after we fucking

tried you for treason, we'd take you out in the street and beat the fucking piss out of you with baseball bats, you cock sucking mother fucker. Next time you turn your back on your fucking country, you'll fucking regret it."

Rather than effectively addressing these issues, the Democrat-inspired domestic terror threats in Oklahoma stemming from DNC-funded defamation continued in April 2017 after other illegal disclosures. In a subsequent series of phone calls and emails, attorneys who were supporting me at the time and I notified the FBI of additional threats from Oklahoma. These further treacherous risks of death from Oklahoma followed immediately after a series of misleading reports by BuzzFeed News and ABC News began on April 3, 2017. Reporters from these news agencies informed me earlier that day of unlawful disclosures which revealed my identity as a confidential FBI informant in a 2015 case.

The initial genesis of these harassing calls from Oklahoma came on October 4, 2016, several days after news articles based on the DNC's defamatory "opposition research" activities which would lead to abuse of process in the FISC just a few weeks later. I understand that this earlier information might not be in the Bureau's records since the U.S. Government's illegal wiretapping and email hacking against me by U.S. Intelligence Community officials allegedly did not begin until the first fraudulent warrant application containing these same false allegations was approved by Presiding Judge Collyer on or about October 21, 2016.

As far back as May 2017, I have tried making similar previous disclosure requests through standard channels including the FBI's Record/Information Dissemination Section. But these have not been fulfilled. Making matters worse, the Privacy Act of 1974 guarantees that, "No agency shall disclose any record...except pursuant to a written request by, or with the prior written consent of, the individual to whom the record pertains". 5 U.S.C. § 552a(b). In alleged violation of this law and largely consistent with a pattern of criminal leaks over recent years, highly misleading redacted excerpts from my illegitimate FISA warrants were illegally disclosed to the *New York Times* on a Saturday last summer^{ix} prior to my subsequent receipt of this information a few days later on Monday, July 23, 2018. In other words, I have never been given any opportunity "to request amendment of a record pertaining to" myself as I had requested from the FBI and DOJ 14 months prior and as the law mandates. 5 U.S.C. § 552a(d)(2).

After innumerable prior mistakes by former Bureau officials in support of the Democrats' malicious high-priced smear campaign, future disclosure of this Oklahoma-related information is important for the restoration of American justice and my personal safety now. For purposes of my DNC Case litigation in Oklahoma, this disclosure can also provide further incontrovertible evidence that "the brunt of the injury would be felt in the forum state". *Dudnikov v. Chalk & Vemillion Fine Arts, Inc.*, 514 F.3d 1063, 1072 (10th Cir. 2008).

As a non-party helping the plaintiff Russian entrepreneur Aleksej Gubarev, the FBI recently supported the unsealing of information related to the DNC's Dossier in other U.S. District Court civil litigation. See "FBI POSITION STATEMENT REGARDING PROPOSED UNSEALING", *Gubarev et al v. Buzzfeed, Inc. et al*, 17-cv-60426, S.D. Fla., Jan. 15, 2019, Dkt. No. 417. I respectfully request that the Bureau and its counsel at the DOJ support my pending U.S. federal litigation as has been done for this Russian plaintiff.

The story of the scandals surrounding the FBI's interference in the 2016 election comes down to the disparity of the treatment of two Bureau informants. On the one hand, public official Christopher Steele was a "person acting for or on behalf of the United States" (18 U.S.C. § 201(a)(1)) who received at least 11 FBI payments in 2016. This specific undisclosed, U.S. taxpayer-funded sum is in addition to the significant amount of money that the DNC paid him during that year allegedly in order "to influence such public official... to commit or aid in committing, or collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States". 18 U.S.C. § 201(b)(1)(B).

In contrast to the Bureau's public official misinformant Mr. Steele and his Democrat funders with whom he has served as a subcontractor involving various intermediaries such as Perkins Coie LLP, I have previously provided essential information to the Bureau on a diverse range of matters over a similar time horizon spanning many years. Yet as a distinguished U.S. military veteran, I am still paying an exceptionally high price in Oklahoma and elsewhere for my loyal volunteer service to the Bureau in the face of these and other extreme misrepresentations in U.S. District Courts as well as related security threats.

Related to the FISA abuse of 2016-2017 that preceded your term at the Bureau, DNC associates successfully helped the FBI deceive U.S. District Court Judges from coast to coast including Rosemary Collyer (D.D.C.), Michael Mosman (D. Or.), Anne C. Conway (M.D. Fla.) and Raymond Dearie (E.D.N.Y.) based on the Democrats' Dossier. I previously found it inconceivable that such a pattern of deception could continue in the wake of wrongdoing uncovered by the U.S. Department of Justice Inspector General and senior leaders in Congress, years later in 2019. But as a result of tenacious nondisclosure, the Democrats' latest false pleadings for the DNC Case in the Western District of Oklahoma over the past several months have unjustly allowed the consequences of these overwhelming attacks to continue. In this latest episode, Kathryn Ruemmler, another Washington lawyer and a former White House Counsel to President Obama, served as the lead signatory on these false pleadings which successfully deceived the Judge in his early order against me. As a result, I am now forced to be more transparent about the specific damages I have suffered in Oklahoma.

Consistent with the approach of other DNC operatives and beneficiaries who have sought to trample any semblance of truth while avoiding disclosure of the crimes that the Democrats committed against myself and other supporters of the Trump Movement, Ms. Ruemmler and her platoon of attorneys have accused me of "improperly attempts to inject information..." (DNC Case, Dkt. No. 28). Despite their preliminary litigation success with the Bureau's initial nondisclosure support, the irony of this statement is readily apparent given the traumatic impact of the pivotal misinformation that her clients caused in Oklahoma and as their intermediaries caused to be delivered to the FISC via the FBI.

Mistakes during the Comey-McCabe era effectively took control of my life, in direct and full support of their Washington colleagues and beneficiaries in the DNC who were allegedly bribing an FBI public official, during or around the same time period. My simple request for these Oklahoma disclosures would represent a small step towards remedying this situation that has been incited, initiated and funded by the Democrats. The defendants in the DNC Case have caused incalculable damage in Oklahoma, within the Bureau, and across our great country, while further destroying core principles of due process along the way. Thank you in advance for your assistance in remedying these extensive injustices.

Very respectfully,

larga

Carter Page, Ph.D.

Cc:

The Honorable Joe Heaton, Chief Judge, U.S. District Court for the W. District of Oklahoma The Honorable Lindsey Graham, Chairman, U.S. Senate Committee on the Judiciary The Honorable Matthew Whitaker, U.S. Attorney General (Acting)

Notes

- As I noted in DNC Case, Dkt. No. 27: "I wish to continue my support of ongoing law enforcement investigations by protecting the integrity of their operations. See, e.g., *Virginia Dep't of State Police v. Washington Post*, 386 F.3d 567, 579 (4th Cir. 2004) ('[A] compelling governmental interest exists in protecting the integrity of an ongoing law enforcement investigation.') However, several of my 2017 interviews with FBI Counterintelligence were directly related to the damages created by the Defendants within the jurisdiction of the state of Oklahoma. If necessary in the case of any remaining jurisdictional uncertainties, Plaintiff can make additional Oklahoma-specific information and/or an associated supplemental brief available upon the request of the Court; preferably under seal to protect the integrity of ongoing law enforcement investigations."
- For example, see: Matt Naham, "William Barr Made Some Big Promises to Lindsey Graham, Including a Strzok/Page Investigation," Law & Crime, January 15th, 2019. https://lawandcrime.com/high-profile/william-barr-made-some-big-promises-to-lindsey-graham-including-a-strzok-page-investigation/
- Rep. Adam Schiff's opening statement rebroadcast his DNC's defamatory information: "According to Christopher Steele, a former British intelligence officer who is reportedly held in high regard by U.S. Intelligence, Russian sources tell him that **Page has also had a secret meeting with Igor Sechin, CEO of Russian gas giant Rosneft**. Sechin is reported to be a former KGB agent and close friend of Putin's. According to Steele's Russian sources, Page is offered brokerage fees by Sechin on a deal involving a 19 percent share of the company. According to Reuters, the sale of a 19.5 percent share in Rosneft later takes place, with unknown purchasers and unknown brokerage fees." See Maya Rhodan, "Read Rep. Adam Schiff's Opening Statement on Russian Meddling in the Election," *Time*, March 20, 2017. http://time.com/4706721/comey-hearing-adam-schiff-transcript/
- ^v Calls and email correspondence with FBI lawyer Kevin Clinesmith during week of April 4, 2017.
- Ali Watkins, "A Former Trump Adviser Met With A Russian Spy," BuzzFeed News, April 3, 2017. [https://www.buzzfeed.com/alimwatkins/a-former-trump-adviser-met-with-a-russian-spy] Brian Ross and Matthew Mosk, "Trump campaign adviser Carter Page targeted for recruitment by Russian spies," ABC News, Apr 4, 2017. [http://abcnews.go.com/Politics/trump-campaign-advisor-carter-page-targeted-russian-spies/story?id=46557506]
- wii Michael Isikoff, "U.S. intel officials probe ties between Trump adviser and Kremlin," Yahoo News, September 23, 2016. https://www.yahoo.com/news/u-s-intel-officials-probe-ties-between-trump-adviser-and-kremlin-175046002.html
- "Report: U.S. Intelligence Officials Examining Trump Adviser's Russia Ties," Radio Free Europe / Radio Liberty, September 24, 2016. http://www.rferl.org/a/report-us-intelligence-probes-trump-advisers-russia-ties-kremlin/28010062.html
- Letter to Deputy AG Rosenstein and FBI Director Wray, "Referral of Christopher Steel for Potential Violations of 18 U.S.C. §1001," Senator Grassley and Senator Graham, January 4, 2018. See also, "Foreign Intelligence Surveillance Act Abuses at the Department of Justice and the Federal Bureau of Investigation," House Intelligence Committee, February 2, 2018.
- Charlie Savage, "Carter Page FISA Documents Are Released by Justice Department," *New York Times*, July 21, 2018. https://www.nytimes.com/2018/07/21/us/politics/carter-page-fisa.html
- ^x Judicial Watch v. U.S. Department of Justice (D.D.C. 17-cv-00916). FBI Record/Information Dissemination Section Letter, "RECORDS BETWEEN FBI AND CHRISTOPHER STEELE AND/OR ORBIS BUSINESS INTELLIGENCE." August 3, 2018.
- Privilege letter from Perkins Coie LLP, "RE FUSION GPS," October 24, 2017. https://assets.documentcloud.org/documents/4116755/PerkinsCoie-Fusion-PrivelegeLetter-102417.pdf

Devlin Barrett, "FBI has questioned Trump campaign adviser Carter Page at length in Russia probe," *Washington Post*, June 26, 2017.