

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR., and  
RICHARD W. GATES III,

Defendants.

Crim. No. 17-201 (ABJ)

STATUS REPORT

The United States of America, by and through Special Counsel Robert S. Mueller, III, respectfully submits this status report to apprise the Court of a recent development related to this matter.

1. On Thursday, February 22, 2018, a grand jury sitting in the Eastern District of Virginia, filed a 32-count indictment charging defendants Paul J. Manafort, Jr., and Richard W. Gates III as follows:

Count	Charge	Defendant
1	Subscribing to False United States Individual Income Tax Returns (2010) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	Manafort
2	Subscribing to False United States Individual Income Tax Returns (2011) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	Manafort
3	Subscribing to False United States Individual Income Tax Returns (2012) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	Manafort
4	Subscribing to False United States Individual Income Tax Returns (2013) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	Manafort
5	Subscribing to False United States Individual Income Tax Returns (2014) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	Manafort

<b>Count</b>	<b>Charge</b>	<b>Defendant</b>
6	Assisting in the Preparation of False United States Individual Income (2010) (26 U.S.C. § 7206(2))	Gates
7	Assisting in the Preparation of False United States Individual Income (2011) (26 U.S.C. § 7206(2))	Gates
8	Assisting in the Preparation of False United States Individual Income (2012) (26 U.S.C. § 7206(2))	Gates
9	Assisting in the Preparation of False United States Individual Income (2013) (26 U.S.C. § 7206(2))	Gates
10	Assisting in the Preparation of False United States Individual Income (2014) (26 U.S.C. § 7206(2))	Gates
11	Failure To File Reports Of Foreign Bank And Financial Accounts (2011) (31 U.S.C. §§ 5314 and 5322(a); 18 U.S.C. § 2)	Manafort
12	Failure To File Reports Of Foreign Bank And Financial Accounts (2012) (31 U.S.C. §§ 5314 and 5322(a); 18 U.S.C. § 2)	Manafort
13	Failure To File Reports Of Foreign Bank And Financial Accounts (2013) (31 U.S.C. §§ 5314 and 5322(a); 18 U.S.C. § 2)	Manafort
14	Failure To File Reports Of Foreign Bank And Financial Accounts (2014) (31 U.S.C. §§ 5314 and 5322(a); 18 U.S.C. § 2)	Manafort
15	Subscribing to False United States Individual Income Tax Returns (2010) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	Gates
16	Subscribing to False United States Individual Income Tax Returns (2011) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	Gates
17	Subscribing to False United States Individual Income Tax Returns (2012) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	Gates
18	Subscribing to False United States Individual Income Tax Returns (2013) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	Gates
19	Subscribing to False United States Individual Income Tax Returns	Gates

Count	Charge	Defendant
	(2014) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	
20	Subscribing to a False Amended United States Individual Income Tax Return (2013) (26 U.S.C. § 7206(1); 18 U.S.C. § 2)	Gates
21	Failure To File Reports Of Foreign Bank And Financial Accounts (2011) (31 U.S.C. §§ 5314 and 5322(a); 18 U.S.C. § 2)	Gates
22	Failure To File Reports Of Foreign Bank And Financial Accounts (2012) (31 U.S.C. §§ 5314 and 5322(a); 18 U.S.C. § 2)	Gates
23	Failure To File Reports Of Foreign Bank And Financial Accounts (2013) (31 U.S.C. §§ 5314 and 5322(a); 18 U.S.C. § 2)	Gates
24	Bank Fraud Conspiracy (Lender B/\$3.4 million loan) (18 U.S.C. § 1349)	Manafort Gates
25	Bank Fraud (Lender B/\$3.4 million loan) (18 U.S.C. §§ 1344, 2)	Manafort Gates
26	Bank Fraud Conspiracy (Lender C / \$1 million loan) (18 U.S.C. § 1349)	Manafort Gates
27	Bank Fraud (Lender C / \$1 million loan) (18 U.S.C. § 1344, 2)	Manafort Gates
28	Bank Fraud Conspiracy (Lender B / \$5.5 million loan) (18 U.S.C. § 1349)	Manafort Gates
29	Bank Fraud Conspiracy (Lender D / \$9.5 million loan) (18 U.S.C. § 1349)	Manafort Gates
30	Bank Fraud (Lender D / \$9.5 million loan) (18 U.S.C. §§ 1344, 2)	Manafort Gates
31	Bank Fraud Conspiracy (Lender D / \$6.5 million loan) (18 U.S.C. § 1349)	Manafort Gates
32	Bank Fraud (Lender D / \$6.5 million loan) (18 U.S.C. §§ 1344, 2)	Manafort Gates

2. A copy of the indictment returned in the Eastern District of Virginia is attached (redacted to omit the signature of the foreperson).

3. The Special Counsel's Office proceeded before the Grand Jury in the Eastern District of Virginia because, based on our current evidence, venue for these charges does not exist in the District of Columbia. Prior to instituting this criminal action, the Special Counsel's Office met with defense counsel to go over the proof underlying the bank fraud charges (the tax charges

were already the subject of charges before this Court) and to provide counsel an opportunity to present any arguments as to why these charges should not be brought. The Special Counsel's Office also alerted defense counsel for each defendant that the government was prepared to bring all of the charges before a Grand Jury in the District of Columbia, if the defendants were willing to waive venue (since otherwise we could not do so legally). If venue had been waived, the defendants would have faced a single indictment in one district, and not two indictments in adjacent districts. One defendant elected, as is his right, not to waive venue. The Special Counsel's Office accordingly has proceeded in the Eastern District of Virginia.

Respectfully submitted,

ROBERT S. MUELLER III  
Special Counsel

Dated: February 22, 2018

By:



Andrew Weissmann  
Greg D. Andres (D.D.C. Bar No. 459221)  
Kyle R. Freeny  
U.S. Department of Justice  
Special Counsel's Office  
950 Pennsylvania Avenue NW  
Washington, DC 20530  
Telephone: (202) 616-0800

*Attorneys for the United States of America*