

# **ATTACHMENT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

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CRIMINAL NO. 17-201-1 (ABJ)(S-5)

Violations: 18 U.S.C. § 371

**SUPERSEDING CRIMINAL INFORMATION**

The Special Counsel informs the Court:

1. PAUL J. MANAFORT, JR. (MANAFORT) served for years as a political consultant and lobbyist. Between at least 2006 and 2015, MANAFORT conspired with Richard W. Gates (Gates), Konstantin Kilimnik (Kilimnik), and others to act, and acted, as unregistered agents of a foreign government and political party. Specifically, MANAFORT conspired to act and acted as an agent of the Government of Ukraine, the Party of Regions (a Ukrainian political party whose leader Victor Yanukovich was President from 2010 to 2014), President Yanukovich, and the Opposition Bloc (a successor to the Party of Regions that formed in 2014 when Yanukovich fled to Russia). MANAFORT generated more than 60 million dollars in income as a result of his Ukraine work. In order to hide Ukraine payments from United States authorities, from approximately 2006 through at least 2016, MANAFORT, with the assistance of Gates and Kilimnik, laundered the money through scores of United States and foreign corporations, partnerships, and bank accounts.
2. In furtherance of the scheme, MANAFORT funneled millions of dollars in payments into

foreign nominee companies and bank accounts, opened by him and his underlings in nominee names and in various foreign countries, including Cyprus, Saint Vincent & the Grenadines (Grenadines), and the United Kingdom. MANAFORT hid the existence of the foreign companies and bank accounts, falsely and repeatedly reporting to his tax preparers and to the United States that he had no foreign bank accounts.

3. In furtherance of the scheme, MANAFORT concealed from the United States his work as an agent of, and millions of dollars in payments from, Ukraine and its political parties and leaders. Because MANAFORT directed a campaign to lobby United States officials and the United States media on behalf of the Government of Ukraine, the President of Ukraine, and Ukrainian political parties, he was required by law to report to the United States his work and fees. MANAFORT did not do so, either for himself or any of his companies. Instead, when the Department of Justice sent inquiries to MANAFORT in 2016 about his activities, MANAFORT responded with a series of false and misleading statements.

4. In furtherance of the scheme, MANAFORT used his hidden overseas wealth to enjoy a lavish lifestyle in the United States, without paying taxes on that income. MANAFORT, without reporting the income to his bookkeeper or tax preparers or to the United States, spent millions of dollars on luxury goods and services for himself and his extended family through payments wired from offshore nominee accounts to United States vendors. MANAFORT also used these offshore accounts to purchase multi-million dollar properties in the United States. Manafort then borrowed millions of dollars in loans using these properties as collateral, thereby obtaining cash in the United States without reporting and paying taxes on the income. In order to increase the amount of money he could access in the United States, Manafort defrauded the institutions that loaned money on

these properties so that they would lend him more money at more favorable rates than he would otherwise be able to obtain.

5. Manafort laundered more than \$30 million to buy property, goods, and services in the United States, income that he concealed from the United States Treasury, the Department of Justice, and others. MANAFORT cheated the United States out of over \$15 million in taxes.

### **Relevant Individuals And Entities**

6. MANAFORT was a United States citizen. He resided in homes in Virginia, Florida, and Long Island, New York.

7. In 2005, MANAFORT and another partner created Davis Manafort Partners, Inc. (DMP) to engage principally in political consulting. DMP had staff in the United States, Ukraine, and Russia. In 2011, MANAFORT created DMP International, LLC (DMI) to engage in work for foreign clients, in particular political consulting, lobbying, and public relations for the Government of Ukraine, the Party of Regions, and members of the Party of Regions. DMI was a partnership solely owned by MANAFORT and his spouse. Gates and Kilimnik worked for both DMP and DMI and served as close confidants of MANAFORT.

8. The Party of Regions was a pro-Russia political party in Ukraine. Beginning in approximately 2006, it retained MANAFORT, through DMP and then DMI, to advance its interests in Ukraine, including the election of its slate of candidates. In 2010, its candidate for President, Yanukovich, was elected President of Ukraine. In 2014, Yanukovich fled Ukraine for Russia in the wake of popular protests of widespread governmental corruption. Yanukovich, the Party of Regions, and the Government of Ukraine were Manafort, DMP, and DMI clients.

9. The European Centre for a Modern Ukraine (the Centre) was created in or about 2012 in



Belgium as a mouthpiece for Yanukovych and the Party of Regions. The Centre was used by MANAFORT and others in order to lobby and conduct a public relations campaign in the United States and Europe on behalf of the existing Ukraine regime. The Centre effectively ceased to operate upon the downfall of Yanukovych in 2014.

10. MANAFORT owned or controlled the following entities, which were used in the scheme (the MANAFORT entities):

Domestic Entities

Entity Name	Date Created	Incorporation Location
Daisy Manafort, LLC (PM)	August 2008	Virginia
	March 2011	Florida
Davis Manafort International LLC (PM)	March 2007	Delaware
DMP (PM)	March 2005	Virginia
	March 2011	Florida
Davis Manafort, Inc. (PM)	October 1999	Delaware
	November 1999	Virginia
DMI (PM)	June 2011	Delaware
	March 2012	Florida
Global Sites LLC (PM)	July 2008	Delaware
Jesand Investment Corporation (PM)	April 2002	Virginia
Jesand Investments Corporation (PM)	March 2011	Florida
John Hannah, LLC (PM)	April 2006	Virginia
	March 2011	Florida

Entity Name	Date Created	Incorporation Location
Lilred, LLC (PM)	December 2011	Florida
LOAV Ltd. (PM)	April 1992	Delaware
MC Brooklyn Holdings, LLC (PM)	November 2012	New York
MC Soho Holdings, LLC (PM)	January 2012	Florida
	April 2012	New York
Smythson LLC (also known as Symthson LLC) (PM)	July 2008	Delaware

Cypriot Entities

Entity Name	Date Created	Incorporation Location
Actinet Trading Limited	May 2009	Cyprus
Black Sea View Limited	August 2007	Cyprus
Bletilla Ventures Limited	October 2010	Cyprus
Cavenari Investments Limited	December 2007	Cyprus
Global Highway Limited	August 2007	Cyprus
Leviathan Advisors Limited	August 2007	Cyprus
LOAV Advisors Limited	August 2007	Cyprus
Lucicle Consultants Limited	December 2008	Cyprus
Marziola Holdings Limited	March 2012	Cyprus
Olivenia Trading Limited	March 2012	Cyprus
Peranova Holdings Limited	June 2007	Cyprus

Entity Name	Date Created	Incorporation Location
Serangon Holdings Limited	January 2008	Cyprus
Yiakora Ventures Limited	February 2008	Cyprus

Other Foreign Entities

Entity Name	Date Created	Incorporation Location
Global Endeavour Inc. (also known as Global Endeavor Inc.)	October 2012	Grenadines
Jeunet Ltd.	August 2011	Grenadines
Pompolo Limited	April 2013	United Kingdom

11. The Internal Revenue Service (IRS) was a bureau in the United States Department of the Treasury responsible for administering the tax laws of the United States and collecting taxes owed to the Treasury.

**The Scheme**

12. Between in or around 2006 and 2017, both dates being approximate and inclusive, in the District of Columbia and elsewhere, MANAFORT and others devised and intended to devise, and executed and attempted to execute, a scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises from the United States, banks, and other financial institutions. As part of the scheme, MANAFORT repeatedly provided false information to financial bookkeepers, tax accountants, and legal counsel, among others.



MANAFORT's Wiring Of Money From Offshore Accounts Into The United States

13. In order to use the money in the offshore nominee accounts of the MANAFORT entities without paying taxes on it, MANAFORT caused millions of dollars in wire transfers from these accounts to be made for goods, services, and real estate. He did not report these transfers as income to DMP, DMI, or MANAFORT.

14. From 2008 to 2014, MANAFORT caused the following wires, totaling over \$12,000,000, to be sent to the vendors listed below for personal items. MANAFORT did not pay taxes on this income, which was used to make the purchases.

Payee	Transaction Date	Originating Account Holder	Country of Origination	Amount of Transaction
S.P.&C. Home Improvement Inc. (Home Improvement Company in the Hamptons, New York)	6/10/2008	LOAV Advisors Limited	Cyprus	\$107,000
	6/25/2008	LOAV Advisors Limited	Cyprus	\$23,500
	7/7/2008	LOAV Advisors Limited	Cyprus	\$20,000
	8/5/2008	Yiakora Ventures Limited	Cyprus	\$59,000
	9/2/2008	Yiakora Ventures Limited	Cyprus	\$272,000
	10/6/2008	Yiakora Ventures Limited	Cyprus	\$109,000
	10/24/2008	Yiakora Ventures Limited	Cyprus	\$107,800
	11/20/2008	Yiakora Ventures Limited	Cyprus	\$77,400
	12/22/2008	Yiakora Ventures Limited	Cyprus	\$100,000
	1/14/2009	Yiakora Ventures Limited	Cyprus	\$9,250
	1/29/2009	Yiakora Ventures Limited	Cyprus	\$97,670
	2/25/2009	Yiakora Ventures Limited	Cyprus	\$108,100
	4/16/2009	Yiakora Ventures Limited	Cyprus	\$94,394
	5/7/2009	Yiakora Ventures Limited	Cyprus	\$54,000
	5/12/2009	Yiakora Ventures Limited	Cyprus	\$9,550
	6/1/2009	Yiakora Ventures Limited	Cyprus	\$86,650
	6/18/2009	Yiakora Ventures Limited	Cyprus	\$34,400
	7/31/2009	Yiakora Ventures Limited	Cyprus	\$106,000
	8/28/2009	Yiakora Ventures Limited	Cyprus	\$37,000
	9/23/2009	Yiakora Ventures Limited	Cyprus	\$203,500
	10/26/2009	Yiakora Ventures Limited	Cyprus	\$38,800
	11/18/2009	Global Highway Limited	Cyprus	\$130,906



<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
	3/8/2010	Global Highway Limited	Cyprus	\$124,000
	5/11/2010	Global Highway Limited	Cyprus	\$25,000
	7/8/2010	Global Highway Limited	Cyprus	\$28,000
	7/23/2010	Leviathan Advisors Limited	Cyprus	\$26,500
	8/12/2010	Leviathan Advisors Limited	Cyprus	\$138,900
	9/2/2010	Yiakora Ventures Limited	Cyprus	\$31,500
	10/6/2010	Global Highway Limited	Cyprus	\$67,600
	10/14/2010	Yiakora Ventures Limited	Cyprus	\$107,600
	10/18/2010	Leviathan Advisors Limited	Cyprus	\$31,500
	12/16/2010	Global Highway Limited	Cyprus	\$46,160
	2/7/2011	Global Highway Limited	Cyprus	\$36,500
	3/22/2011	Leviathan Advisors Limited	Cyprus	\$26,800
	4/4/2011	Leviathan Advisors Limited	Cyprus	\$195,000
	5/3/2011	Global Highway Limited	Cyprus	\$95,000
	5/16/2011	Leviathan Advisors Limited	Cyprus	\$6,500
	5/31/2011	Leviathan Advisors Limited	Cyprus	\$70,000
	6/27/2011	Leviathan Advisors Limited	Cyprus	\$39,900
	7/27/2011	Leviathan Advisors Limited	Cyprus	\$95,000
	10/24/2011	Global Highway Limited	Cyprus	\$22,000
	10/25/2011	Global Highway Limited	Cyprus	\$9,300
	11/15/2011	Global Highway Limited	Cyprus	\$74,000
	11/23/2011	Global Highway Limited	Cyprus	\$22,300
	11/29/2011	Global Highway Limited	Cyprus	\$6,100
	12/12/2011	Leviathan Advisors Limited	Cyprus	\$17,800
	1/17/2012	Global Highway Limited	Cyprus	\$29,800
	1/20/2012	Global Highway Limited	Cyprus	\$42,600
	2/9/2012	Global Highway Limited	Cyprus	\$22,300
	2/23/2012	Global Highway Limited	Cyprus	\$75,000
	2/28/2012	Global Highway Limited	Cyprus	\$22,300
	3/28/2012	Peranova Holdings Limited	Cyprus	\$37,500
	4/18/2012	Lucicle Consultants Limited	Cyprus	\$50,000
	5/15/2012	Lucicle Consultants Limited	Cyprus	\$79,000
	6/5/2012	Lucicle Consultants Limited	Cyprus	\$45,000
	6/19/2012	Lucicle Consultants Limited	Cyprus	\$11,860
	7/9/2012	Lucicle Consultants Limited	Cyprus	\$10,800
	7/18/2012	Lucicle Consultants Limited	Cyprus	\$88,000



<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
	8/7/2012	Lucicle Consultants Limited	Cyprus	\$48,800
	9/27/2012	Lucicle Consultants Limited	Cyprus	\$100,000
	11/20/2012	Lucicle Consultants Limited	Cyprus	\$298,000
	12/20/2012	Lucicle Consultants Limited	Cyprus	\$55,000
	1/29/2013	Lucicle Consultants Limited	Cyprus	\$149,000
	3/12/2013	Lucicle Consultants Limited	Cyprus	\$375,000
	8/29/2013	Global Endeavour Inc.	Grenadines	\$200,000
	11/13/2013	Global Endeavour Inc.	Grenadines	\$75,000
	11/26/2013	Global Endeavour Inc.	Grenadines	\$80,000
	12/6/2013	Global Endeavour Inc.	Grenadines	\$130,000
	12/12/2013	Global Endeavour Inc.	Grenadines	\$90,000
	4/22/2014	Global Endeavour Inc.	Grenadines	\$56,293
	8/18/2014	Global Endeavour Inc.	Grenadines	\$34,660
<b>Total</b>				<b>\$5,434,793</b>
<b>Big Picture Solutions</b> (Home Automation, Lighting and Home Entertainment Company in Florida)	3/22/2011	Leviathan Advisors Limited	Cyprus	\$12,000
	3/28/2011	Leviathan Advisors Limited	Cyprus	\$25,000
	4/27/2011	Leviathan Advisors Limited	Cyprus	\$12,000
	5/16/2011	Leviathan Advisors Limited	Cyprus	\$25,000
	11/15/2011	Global Highway Limited	Cyprus	\$17,006
	11/23/2011	Global Highway Limited	Cyprus	\$11,000
	2/28/2012	Global Highway Limited	Cyprus	\$6,200
	10/31/2012	Lucicle Consultants Limited	Cyprus	\$290,000
	12/17/2012	Lucicle Consultants Limited	Cyprus	\$160,600
	1/15/2013	Lucicle Consultants Limited	Cyprus	\$194,000
	1/24/2013	Lucicle Consultants Limited	Cyprus	\$6,300
	2/12/2013	Lucicle Consultants Limited	Cyprus	\$51,600
	2/26/2013	Lucicle Consultants Limited	Cyprus	\$260,000
	7/15/2013	Pompolo Limited	United Kingdom	\$175,575
	8/28/2013	Global Endeavour Inc.	Grenadines	\$179,000
	10/31/2013	Global Endeavour Inc.	Grenadines	\$73,000
	5/23/2014	Global Endeavour Inc.	Grenadines	\$99,960
	6/20/2014	Global Endeavour Inc.	Grenadines	\$62,960
<b>Total</b>				<b>\$1,661,201</b>
<b>J&amp;J Oriental Rug Gallery</b>	10/7/2008	Yiakora Ventures Limited	Cyprus	\$15,750
	3/17/2009	Yiakora Ventures Limited	Cyprus	\$46,200



<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
(Antique Rug Store in Alexandria, Virginia)	4/16/2009	Yiakora Ventures Limited	Cyprus	\$7,400
	4/27/2009	Yiakora Ventures Limited	Cyprus	\$65,000
	5/7/2009	Yiakora Ventures Limited	Cyprus	\$210,000
	7/15/2009	Yiakora Ventures Limited	Cyprus	\$200,000
	3/31/2010	Yiakora Ventures Limited	Cyprus	\$140,000
	6/16/2010	Global Highway Limited	Cyprus	\$250,000
<b>Total</b>				<b>\$934,350</b>
<b>Vendor D</b> (Related to J&J Oriental Rug Gallery)	2/28/2012	Global Highway Limited	Cyprus	\$100,000
<b>Vendor D Total</b>				<b>\$100,000</b>
<b>Alan Couture</b> (Men's Clothing Store in New York)	11/7/2008	Yiakora Ventures Limited	Cyprus	\$32,000
	2/5/2009	Yiakora Ventures Limited	Cyprus	\$22,750
	4/27/2009	Yiakora Ventures Limited	Cyprus	\$13,500
	10/26/2009	Yiakora Ventures Limited	Cyprus	\$32,500
	3/30/2010	Yiakora Ventures Limited	Cyprus	\$15,000
	5/11/2010	Global Highway Limited	Cyprus	\$39,000
	6/28/2010	Leviathan Advisors Limited	Cyprus	\$5,000
	8/12/2010	Leviathan Advisors Limited	Cyprus	\$32,500
	11/17/2010	Global Highway Limited	Cyprus	\$11,500
	2/7/2011	Global Highway Limited	Cyprus	\$24,000
	3/22/2011	Leviathan Advisors Limited	Cyprus	\$43,600
	3/28/2011	Leviathan Advisors Limited	Cyprus	\$12,000
	4/27/2011	Leviathan Advisors Limited	Cyprus	\$3,000
	6/30/2011	Global Highway Limited	Cyprus	\$24,500
	9/26/2011	Leviathan Advisors Limited	Cyprus	\$12,000
	11/2/2011	Global Highway Limited	Cyprus	\$26,700
	12/12/2011	Leviathan Advisors Limited	Cyprus	\$46,000
	2/9/2012	Global Highway Limited	Cyprus	\$2,800
	2/28/2012	Global Highway Limited	Cyprus	\$16,000
	3/14/2012	Lucicle Consultants Limited	Cyprus	\$8,000
	4/18/2012	Lucicle Consultants Limited	Cyprus	\$48,550
	5/15/2012	Lucicle Consultants Limited	Cyprus	\$7,000
	6/19/2012	Lucicle Consultants Limited	Cyprus	\$21,600
	8/7/2012	Lucicle Consultants Limited	Cyprus	\$15,500



<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
	11/20/2012	Lucicle Consultants Limited	Cyprus	\$10,900
	12/20/2012	Lucicle Consultants Limited	Cyprus	\$7,500
	1/15/2013	Lucicle Consultants Limited	Cyprus	\$37,000
	2/12/2013	Lucicle Consultants Limited	Cyprus	\$7,000
	2/26/2013	Lucicle Consultants Limited	Cyprus	\$39,000
	9/3/2013	Global Endeavour Inc.	Grenadines	\$81,500
	10/9/2013	Global Endeavour Inc.	Grenadines	\$53,000
	11/25/2013	Global Endeavour Inc.	Grenadines	\$13,200
	4/17/2014	Global Endeavour Inc.	Grenadines	\$26,680
	9/11/2014	Global Endeavour Inc.	Grenadines	\$58,435
<b>Total</b>				<b>\$849,215</b>
<b>Scott L. Wilson Landscaping</b> (Landscaper in the Hamptons, New York)	4/27/2009	Yiakora Ventures Limited	Cyprus	\$34,000
	5/12/2009	Yiakora Ventures Limited	Cyprus	\$45,700
	6/1/2009	Yiakora Ventures Limited	Cyprus	\$21,500
	6/18/2009	Yiakora Ventures Limited	Cyprus	\$29,000
	9/21/2009	Yiakora Ventures Limited	Cyprus	\$21,800
	5/11/2010	Global Highway Limited	Cyprus	\$44,000
	6/28/2010	Leviathan Advisors Limited	Cyprus	\$50,000
	7/23/2010	Leviathan Advisors Limited	Cyprus	\$19,000
	9/2/2010	Yiakora Ventures Limited	Cyprus	\$21,000
	10/6/2010	Global Highway Limited	Cyprus	\$57,700
	10/18/2010	Leviathan Advisors Limited	Cyprus	\$26,000
	12/16/2010	Global Highway Limited	Cyprus	\$20,000
	3/22/2011	Leviathan Advisors Limited	Cyprus	\$50,000
	5/3/2011	Global Highway Limited	Cyprus	\$40,000
	6/1/2011	Leviathan Advisors Limited	Cyprus	\$44,000
	7/27/2011	Leviathan Advisors Limited	Cyprus	\$27,000
	8/16/2011	Leviathan Advisors Limited	Cyprus	\$13,450
	9/19/2011	Leviathan Advisors Limited	Cyprus	\$12,000
	10/24/2011	Global Highway Limited	Cyprus	\$42,000
	11/2/2011	Global Highway Limited	Cyprus	\$37,350
<b>Total</b>				<b>\$655,500</b>
<b>Vendor G</b> (Antique Dealer in New York)	9/2/2010	Yiakora Ventures Limited	Cyprus	\$165,000
	10/18/2010	Leviathan Advisors Limited	Cyprus	\$165,000
	2/28/2012	Global Highway Limited	Cyprus	\$190,600
	3/14/2012	Lucicle Consultants Limited	Cyprus	\$75,000



Payee	Transaction Date	Originating Account Holder	Country of Origination	Amount of Transaction
	2/26/2013	Lucicle Consultants Limited	Cyprus	\$28,310
<b>Vendor G Total</b>				<b>\$623,910</b>
<b>Fashion World, Inc. d/b/a/ Bijan</b> (Clothing Store in Beverly Hills, California)	6/25/2008	LOAV Advisors Limited	Cyprus	\$52,000
	12/16/2008	Yiakora Ventures Limited	Cyprus	\$49,000
	12/22/2008	Yiakora Ventures Limited	Cyprus	\$10,260
	8/12/2009	Yiakora Ventures Limited	Cyprus	\$76,400
	5/11/2010	Global Highway Limited	Cyprus	\$85,000
	11/17/2010	Global Highway Limited	Cyprus	\$128,280
	5/31/2011	Leviathan Advisors Limited	Cyprus	\$64,000
	11/15/2011	Global Highway Limited	Cyprus	\$48,000
	12/17/2012	Lucicle Consultants Limited	Cyprus	\$7,500
<b>Total</b>				<b>\$520,440</b>
<b>Aegis Holdings, LLC</b> (Investment Company)	9/3/2013	Global Endeavour Inc.	Grenadines	\$500,000
<b>Total</b>				<b>\$500,000</b>
<b>Paul Sabatello Construction</b> (Contractor in Florida)	11/15/2011	Global Highway Limited	Cyprus	\$8,000
	12/5/2011	Leviathan Advisors Limited	Cyprus	\$11,237
	12/21/2011	Black Sea View Limited	Cyprus	\$20,000
	2/9/2012	Global Highway Limited	Cyprus	\$51,000
	5/17/2012	Lucicle Consultants Limited	Cyprus	\$68,000
	6/19/2012	Lucicle Consultants Limited	Cyprus	\$60,000
	7/18/2012	Lucicle Consultants Limited	Cyprus	\$32,250
	9/19/2012	Lucicle Consultants Limited	Cyprus	\$112,000
	11/30/2012	Lucicle Consultants Limited	Cyprus	\$39,700
	1/9/2013	Lucicle Consultants Limited	Cyprus	\$25,600
	2/28/2013	Lucicle Consultants Limited	Cyprus	\$4,700
<b>Total</b>				<b>\$432,487</b>
<b>New Leaf Landscape Maintenance LLC</b>	12/5/2011	Leviathan Advisors Limited	Cyprus	\$4,115
	3/1/2012	Global Highway Limited	Cyprus	\$50,000
	6/6/2012	Lucicle Consultants Limited	Cyprus	\$47,800
	6/25/2012	Lucicle Consultants Limited	Cyprus	\$17,900
	6/27/2012	Lucicle Consultants Limited	Cyprus	\$18,900
	2/12/2013	Lucicle Consultants Limited	Cyprus	\$3,300

<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
(Landscape in the Hamptons, New York)	7/15/2013	Pompolo Limited	United Kingdom	\$13,325
	11/25/2013	Global Endeavour Inc.	Grenadines	\$9,400
	4/15/2014	Global Endeavour Inc.	Grenadines	\$33,211
	5/13/2014	Global Endeavour Inc.	Grenadines	\$30,965
	9/11/2014	Global Endeavour Inc.	Grenadines	\$26,769
<b>Total</b>				<b>\$255,685</b>
<b>Don Beyer Motors, Inc.</b> (Payments Relating to three Range Rovers)	4/12/2012	Lucicle Consultants Limited	Cyprus	\$83,525
	5/2/2012	Lucicle Consultants Limited	Cyprus	\$12,525
	6/29/2012	Lucicle Consultants Limited	Cyprus	\$67,655
<b>Total</b>				<b>\$163,705</b>
<b>Federal Stone and Brick LLC</b> (Contractor in Virginia)	11/20/2012	Lucicle Consultants Limited	Cyprus	\$45,000
	12/7/2012	Lucicle Consultants Limited	Cyprus	\$21,000
	12/17/2012	Lucicle Consultants Limited	Cyprus	\$21,000
	1/17/2013	Lucicle Consultants Limited	Cyprus	\$18,750
	1/29/2013	Lucicle Consultants Limited	Cyprus	\$9,400
	2/12/2013	Lucicle Consultants Limited	Cyprus	\$10,500
<b>Total</b>				<b>\$125,650</b>
<b>Sensoryphile, Inc.</b> (Audio, Video, and Control System Home Integration and Installation Company in the Hamptons, New York)	1/29/2009	Yiakora Ventures Limited	Cyprus	\$10,000
	3/17/2009	Yiakora Ventures Limited	Cyprus	\$21,725
	4/16/2009	Yiakora Ventures Limited	Cyprus	\$24,650
	12/2/2009	Global Highway Limited	Cyprus	\$10,000
	3/8/2010	Global Highway Limited	Cyprus	\$20,300
	4/23/2010	Yiakora Ventures Limited	Cyprus	\$8,500
	7/29/2010	Leviathan Advisors Limited	Cyprus	\$17,650
<b>Total</b>				<b>\$112,825</b>



<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
<b>American Service Center Associates of Alexiandria</b> (Purchase of Mercedes Benz)	10/5/2012	Lucicle Consultants Limited	Cyprus	\$62,750
<b>Total</b>				<b>\$62,750</b>
<b>Land Rover of Palm Beach</b> (Purchase of Range Rover)	12/30/2008	Yiakora Ventures Limited	Cyprus	\$47,000
<b>Total</b>				<b>\$47,000</b>
<b>Vendor Q</b> (Property Management Company in South Carolina)	9/2/2010	Yiakora Ventures Limited	Cyprus	\$10,000
	10/6/2010	Global Highway Limited	Cyprus	\$10,000
	10/18/2010	Leviathan Advisors Limited	Cyprus	\$10,000
	2/8/2011	Global Highway Limited	Cyprus	\$13,500
	2/9/2012	Global Highway Limited	Cyprus	\$2,500
<b>Vendor Q Total</b>				<b>\$46,000</b>
<b>Vendor R</b> (Art Gallery in Florida)	2/9/2011	Global Highway Limited	Cyprus	\$17,900
	2/14/2013	Lucicle Consultants Limited	Cyprus	\$14,000
<b>Vendor R Total</b>				<b>\$31,900</b>
<b>Vendor S</b> (Housekeeping in New York)	9/26/2011	Leviathan Advisors Limited	Cyprus	\$5,000
	9/19/2012	Lucicle Consultants Limited	Cyprus	\$5,000
	10/9/2013	Global Endeavour Inc.	Grenadines	\$10,000
<b>Vendor S Total</b>				<b>\$20,000</b>

15. In 2012, MANAFORT caused the following wires to be sent to the entities listed below to purchase the real estate also listed below. MANAFORT did not report the money used to make these purchases on his 2012 tax return.

Property Purchased	Payee	Date	Originating Account	Country of Origin	Amount
Howard Street Condominium (New York)	DMP International LLC	2/1/2012	Peranova Holdings Limited	Cyprus	\$1,500,000
Union Street Brownstone, (New York)	Attorney Account Of [Real Estate Attorney]	11/20/2012	Lucicle Consultants Limited	Cyprus	\$299,500
		11/29/2012	Actinet Trading Limited	Cyprus	\$1,800,000
		11/29/2012	Actinet Trading Limited	Cyprus	\$1,200,000
Arlington House (Virginia)	Real Estate Trust	8/31/2012	Lucicle Consultants Limited	Cyprus	\$1,900,000

16. MANAFORT also disguised, as purported “loans,” more than \$13 million from Cypriot entities, including the overseas MANAFORT entities, to domestic entities owned by MANAFORT. For example, a \$1.5 million wire from Peranova Holdings Limited (Peranova) to DMI that MANAFORT used to purchase real estate on Howard Street in Manhattan, New York, was recorded as a “loan” from Peranova to DMI, rather than as income. The following loans were shams designed to reduce fraudulently MANAFORT’s reported taxable income.

Year	Payor / Ostensible “Lender”	Payee / Ostensible “Borrower”	Country of Origination	Total Amount of “Loans”
2008	Yiakora Ventures Limited	Jesand Investment Corporation	Cyprus	\$8,120,000
2008	Yiakora Ventures Limited	DMP	Cyprus	\$500,000
2009	Yiakora Ventures Limited	DMP	Cyprus	\$694,000
2009	Yiakora Ventures Limited	Daisy Manafort, LLC	Cyprus	\$500,000
2012	Peranova	DMI	Cyprus	\$1,500,000
2014	Telmar Investments Ltd.	DMI	Cyprus	\$900,000
2015	Telmar Investments Ltd.	DMI	Cyprus	\$1,000,000
<b>Total</b>				<b>\$13,214,000</b>

MANAFORT's Hiding Of Ukraine Lobbying And Public Relations Work

17. MANAFORT knew it was illegal to lobby government officials and engage in public relations activities (hereinafter collectively referred to as lobbying) in the United States on behalf of a foreign government or political party, without registering with the United States Government under the Foreign Agents Registration Act. MANAFORT knew he was lobbying in the United States for the Government of Ukraine, President Viktor F. Yanukovich, the Party of Regions, and the Opposition Bloc (the latter two being political parties in Ukraine), and thus he was supposed to submit a written registration statement to the United States Department of Justice. MANAFORT knew that the filing was required to disclose the name of the foreign country, all the financial payments to the lobbyist, and the specific steps undertaken for the foreign country in the United States, among other information.

18. MANAFORT knew that Ukraine had a strong interest in the United States' taking economic and policy positions favorable to Ukraine, including not imposing sanctions on Ukraine. MANAFORT also knew that the trial and treatment of President Yanukovich's political rival, former Prime Minister Yulia Tymoshenko, was strongly condemned by leading United States executive and legislative branch officials, and was a major hurdle to improving United States and Ukraine relations.

19. From 2006 until 2015, MANAFORT led a multi-million dollar lobbying campaign in the United States at the direction of the Government of Ukraine, President Yanukovich, the Party of Regions, and the Opposition Bloc. MANAFORT intentionally did so without registering and providing the disclosures required by law.

20. As part of the lobbying scheme, MANAFORT hired numerous firms and people to assist in

his lobbying campaign in the United States. He hired Companies A, B, C, D, and E, and Law Firm A, among others, to participate in what he described to President Yanukovych in writing as a global “Engage Ukraine” lobbying campaign that he devised and led. These companies and law firm were paid the equivalent of over \$11 million for their Ukraine work.

21. MANAFORT viewed secrecy for himself and for the actions of his lobbyists as integral to the effectiveness of the lobbying offensive he orchestrated for Ukraine. Filing under the Foreign Agents Registration Act would have thwarted the secrecy MANAFORT sought in order to conduct an effective campaign for Ukraine to influence both American leaders and the American public.

22. MANAFORT took steps to avoid any of these firms and people disclosing their lobbying efforts under the Foreign Agents Registration Act. As one example, even though MANAFORT engaged Company E in 2007 to lobby in the United States for the Government of Ukraine, MANAFORT tried to dissuade Company E from filing under the Foreign Agents Registration Act. Only after MANAFORT ceased to use Company E in the fall of 2007 did Company E disclose its work for Ukraine, in a belated filing under the Act in 2008.

23. MANAFORT took other measures to keep the Ukraine lobbying as secret as possible. For example, MANAFORT, in written communications on or about May 16, 2013, directed his lobbyists (including Persons D1 and D2, who worked for Company D) to write and disseminate within the United States news stories that alleged that Tymoshenko had paid for the murder of a Ukrainian official. MANAFORT stated that it should be “push[ed]” “[w]ith no fingerprints.” “It is very important we have no connection.” MANAFORT stated that “[m]y goal is to plant some stink on Tymo.” Person D1 objected to the plan, but ultimately Persons D1 and D2 complied with MANAFORT’s direction. The Foreign Agents Registration Act required MANAFORT to disclose

such lobbying, as MANAFORT knew. He did not.

The Hapsburg Group and Company D

24. As part of the lobbying scheme, starting in 2011, MANAFORT secretly retained Company D and a group of four former European heads of state and senior officials (including a former Austrian Chancellor, Italian Prime Minister, and Polish President) to lobby in the United States and Europe on behalf of Ukraine. The former politicians, called the Hapsburg Group by MANAFORT, appeared to be providing solely their independent assessments of Government of Ukraine policies, when in fact they were paid by Ukraine. MANAFORT explained in an “EYES ONLY” memorandum in or about June 2012 that his purpose was to “assemble a small group of high-level European influential [sic] champions and politically credible friends who can act informally and without any visible relationship with the Government of Ukraine.”

25. Through MANAFORT, the Government of Ukraine retained an additional group of lobbyists (Company D and Persons D1 and D2). In addition to lobbying itself, Company D secretly served as intermediaries between the Hapsburg Group and MANAFORT and the Government of Ukraine. In or about 2012 through 2013, MANAFORT directed more than the equivalent of 700,000 euros to be wired from at least three of his offshore accounts to the benefit of Company D to pay secretly for its services.

26. All four Hapsburg Group members, at the direction, and with the direct assistance, of MANAFORT, advocated positions favorable to Ukraine in meetings with United States lawmakers, interviews with United States journalists, and ghost written op-eds in American publications. In or about 2012 through 2014, MANAFORT directed more than 2 million euros to be wired from at least four of his offshore accounts to pay secretly the Hapsburg Group. To avoid



European taxation, the contract with the Hapsburg Group falsely stated that none of its work would take place in Europe.

27. One of the Hapsburg Group members, a former Polish President, was also a representative of the European Parliament with oversight responsibility for Ukraine. MANAFORT solicited that official to provide MANAFORT inside information about the European Parliament's views and actions toward Ukraine and to take actions favorable to Ukraine. MANAFORT also used this Hapsburg Group member's current European Parliament position to Ukraine's advantage in his lobbying efforts in the United States. In the fall of 2012, the United States Senate was considering and ultimately passed a resolution critical of President Yanukovich's treatment of former Prime Minister Tymoshenko. MANAFORT engaged in an all-out campaign to try to kill or delay the passage of this resolution. Among the steps he took was having the Hapsburg Group members reach out to United States Senators, as well as directing Companies A and B to have private conversations with Senators to lobby them to place a "hold" on the resolution. MANAFORT told his lobbyists to stress to the Senators that the former Polish President who was advocating against the resolution was currently a designated representative of the President of the European Parliament, to give extra clout to his supposedly independent judgment against the Senate resolution. MANAFORT never revealed to the Senators or to the American public that any of these lobbyists or Hapsburg Group members were paid by Ukraine.

28. In another example, on May 16, 2013, another member of the Hapsburg Group lobbied in the United States for Ukraine. The Hapsburg Group member accompanied his country's prime minister to the Oval Office and met with the President and Vice President of the United States, as well as senior United States officials in the executive and legislative branches. In written



communications sent to MANAFORT, Person D1 reported that the Hapsburg Group member delivered the message of not letting “Russians Steal Ukraine from the West.” The Foreign Agents Registration Act required MANAFORT to disclose such lobbying, as MANAFORT knew. He did not.

#### Law Firm Report and Tymoshenko

29. As another part of the lobbying scheme, in 2012, on behalf of President Yanukovich and the Government of Ukraine’s Ministry of Justice, MANAFORT solicited a United States law firm to write a report evaluating the trial of Yanukovich’s political opponent Yulia Tymoshenko. MANAFORT caused Ukraine to hire the law firm so that its report could be used in the United States and elsewhere to defend the Tymoshenko criminal trial and argue that President Yanukovich and Ukraine had not engaged in selective prosecution.

30. MANAFORT retained a public relations firm (Company C) to prepare a media roll-out plan for the law firm report. MANAFORT used one of his offshore accounts to pay Company C the equivalent of more than \$1 million for its services.

31. MANAFORT worked closely with Company C to develop a detailed written lobbying plan in connection with what MANAFORT termed the “selling” of the report. This campaign included getting the law firm’s report “seeded” to the press in the United States—that is, to leak the report ahead of its official release to a prominent United States newspaper and then use that initial article to influence reporting globally. As part of the roll-out plan, on the report’s issuance on December 13, 2012, MANAFORT arranged to have the law firm disseminate hard copies of the report to numerous government officials, including senior United States executive and legislative branch officials.

32. MANAFORT reported on the law firm's work on the report and Company C's lobbying plan to President Yanukovich and other representatives of the Government of Ukraine. For example, in a July 27, 2012 memorandum to President Yanukovich's Chief of Staff, MANAFORT reported on "the global rollout strategy for the [law firm's] legal report, and provide[d] a detailed plan of action[]" which included step-by-step lobbying outreach in the United States.

33. MANAFORT directed lobbyists to tout the report as showing that President Yanukovich had not selectively prosecuted Tymoshenko. But in November 2012 MANAFORT had been told privately in writing by the law firm that the evidence of Tymoshenko's criminal intent "is virtually non-existent" and that it was unclear even among legal experts that Tymoshenko lacked power to engage in the conduct central to the Ukraine criminal case. These facts, known by MANAFORT, were not disclosed to the public.

34. Manafort knew that the report also did not disclose that the law firm, in addition to being retained to write the report, was retained to represent Ukraine itself, including in connection with the Tymoshenko case and to provide training to the trial team prosecuting Tymoshenko.

35. MANAFORT also knew that the Government of Ukraine did not want to disclose how much the report cost. More than \$4.6 million was paid to the law firm for its work. MANAFORT used one of his offshore accounts to funnel \$4 million to pay the law firm, a fact that MANAFORT did not disclose to the public. Instead, the Government of Ukraine reported falsely that the report cost just \$12,000.

36. MANAFORT and others knew that the actual cost of the report and the scope of the law firm's work would undermine the report's being perceived as an independent assessment and thus being an effective lobbying tool for MANAFORT to use to support the incarceration of President

Yanukovich's political opponent.

37. In addition to the law firm report, MANAFORT took other steps on behalf of the Government of Ukraine to tarnish Tymoshenko in the United States. In addition to disseminating stories about her soliciting murder, noted above, in October 2012, MANAFORT orchestrated a scheme to have, as he wrote in a contemporaneous communication, "[O]bama jews" put pressure on the Administration to disavow Tymoshenko and support Yanukovich. MANAFORT sought to undermine United States support for Tymoshenko by spreading stories in the United States that a senior Cabinet official (who had been a prominent critic of Yanukovich's treatment of Tymoshenko) was supporting anti-Semitism because the official supported Tymoshenko, who in turn had formed a political alliance with a Ukraine party that espoused anti-Semitic views. MANAFORT coordinated privately with a senior Israeli government official to issue a written statement publicizing this story. MANAFORT then, with secret advance knowledge of that Israeli statement, worked to disseminate this story in the United States, writing to Person D1 "I have someone pushing it on the NY Post. Bada bing bada boom." MANAFORT sought to have the Administration understand that "the Jewish community will take this out on Obama on election day if he does nothing." MANAFORT then told his United States lobbyist to inform the Administration that Ukraine had worked to prevent the Administration's presidential opponent from including damaging language in the Israeli statement, so as not to harm the Administration, and thus further ingratiate Yanukovich with the Administration.

Company A and Company B

38. As a third part of the lobbying scheme, in February 2012, MANAFORT solicited two Washington, D.C. lobbying firms (Company A and Company B) to lobby in the United States on

behalf of President Yanukovych, the Party of Regions and the Government of Ukraine. For instance, in early 2012 at the inception of the relationship, Company B wrote in an email to its team about a “potential representation for the Ukraine,” having been contacted “at the suggestion of Paul Manafort who has been working on the current PM elections.”

39. MANAFORT arranged to pay Companies A and B over \$2 million from his offshore accounts for their United States lobbying work for Ukraine.

40. MANAFORT provided direction to Companies A and B in their lobbying efforts, including providing support for numerous United States visits by numerous senior Ukrainian officials. Companies A and B, at MANAFORT’s direction, engaged in extensive United States lobbying. Among other things, they lobbied dozens of Members of Congress, their staff, and White House and State Department officials about Ukraine sanctions, the validity of Ukraine elections, and the propriety of President Yanukovych’s imprisoning Tymoshenko, his presidential rival.

41. In addition, with the assistance of Company A, MANAFORT also personally lobbied in the United States. He drafted and edited numerous ghost-written op-eds for publication in United States newspapers. He also personally met in March 2013 in Washington, D.C., with a Member of Congress who was on a subcommittee that had Ukraine within its purview. After the meeting, MANAFORT prepared a report for President Yanukovych that the meeting “went well” and reported a series of positive developments for Ukraine from the meeting.

42. Indeed, MANAFORT repeatedly communicated in person and in writing with President Yanukovych and his staff about the lobbying activities of Companies A and B and he tasked the companies to prepare assessments of their work so he, in turn, could brief President Yanukovych. For instance, MANAFORT wrote President Yanukovych a memorandum dated April 8, 2012, in

which he provided an update on the lobbying firms' activities "since the inception of the project a few weeks ago. It is my intention to provide you with a weekly update moving forward." In November 2012, Gates wrote to Companies A and B that the firms needed to prepare an assessment of their past and prospective lobbying efforts so the "President" could be briefed by "Paul" "on what Ukraine has done well and what it can do better as we move into 2013." The resulting memorandum from Companies A and B, with input from Gates, noted among other things that the "client" had not been as successful as hoped given that it had an Embassy in Washington.

43. To distance their United States lobbying work from the Government of Ukraine, and to avoid having to register as agents of Ukraine under the Foreign Agents Registration Act, MANAFORT with others arranged for Companies A and B to be engaged by a newly-formed Brussels entity called the European Centre for the Modern Ukraine (the Centre), instead of directly by the Government of Ukraine.

44. MANAFORT described the Centre as "the Brussels NGO that we have formed" to coordinate lobbying for Ukraine. The Centre was founded by a Ukraine Party of Regions member and Ukraine First Vice-Prime Minister. The head of its Board was another member of the Party of Regions, who became the Ukraine Foreign Minister.

45. In spite of these ties to Ukraine, MANAFORT and others arranged for the Centre to represent falsely that it was not "directly or indirectly supervised, directed, [or] controlled" in whole or in major part by the Government of Ukraine or the Party of Regions. MANAFORT knew that the false and misleading representations would lead Companies A and B not to register their activities pursuant to the Foreign Agents Registration Act.

46. Despite the Centre being the ostensible client of Companies A and B, MANAFORT knew

that the Centre did not direct or oversee their work. The firms received direction from MANAFORT and his subordinate Gates, on behalf of the Government of Ukraine.

47. Various employees of Companies A and B understood that they were receiving direction from MANAFORT and President Yanukovich, not the Centre, which was not even operational when Companies A and B began lobbying for Ukraine. MANAFORT, Gates, and employees of both Companies A and B referred to the client in ways that made clear they knew it was Ukraine, for instance noting that the “client” had an Embassy in Washington D.C. The head of Company B told his team to think the President of Ukraine “is the client.” As a Company A employee noted to another company employee: the lobbying for the Centre was “in name only. [Y]ou’ve gotta see through the nonsense of that[.]” “It’s like Alice in Wonderland.” An employee of Company B described the Centre as a fig leaf, and the Centre’s written certification that it was not related to the Party of Regions as “a fig leaf on a fig leaf,” referring to the Centre in an email as the “European hot dog stand for a Modern Ukraine.”

Conspiring to Obstruct Justice: False and Misleading Submissions to the Department of Justice

48. In September 2016, after numerous press reports concerning MANAFORT had appeared in August, the Department of Justice National Security Division informed MANAFORT, Gates, and DMI in writing that it sought to determine whether they had acted as agents of a foreign principal under the Foreign Agents Registration Act, without registering. In November 2016 and February 2017, MANAFORT and Gates conspired to knowingly and intentionally cause false and misleading letters to be submitted to the Department of Justice, through his unwitting legal counsel. The letters, both of which were approved by MANAFORT before they were submitted by his counsel, represented falsely, among other things, that:

a. DMI’s “efforts on behalf of the Party of Regions” “did not include meetings or outreach within the U.S.”;

b. MANAFORT did not “recall meeting with or conducting outreach to U.S. government officials or U.S. media outlets on behalf of the [Centre], nor do they recall being party to, arranging, or facilitating any such communications. Rather, it is the recollection and understanding of Messrs. Gates and Manafort that such communications would have been facilitated and conducted by the [Centre’s] U.S. consultants, as directed by the [Centre]. . . .”;

c. MANAFORT had merely served as a means of introduction of Company A and Company B to the Centre and provided the Centre with a list of “potential U.S.-based consultants—including [Company A] and [Company B]—for the [Centre’s] reference and further consideration”; and

d. DMI “does not retain communications beyond thirty days” and as a result of this policy, a “search has returned no responsive documents.” The November 2016 letter attached a one-page, undated document that purported to be a DMI “Email Retention Policy.”

49. In fact, MANAFORT had: selected Companies A and B; engaged in weekly scheduled calls and frequent emails with Companies A and B to provide them directions as to specific lobbying steps that should be taken; sought and received detailed oral and written reports from these firms on the lobbying work they had performed; communicated with Yanukovich to brief him on their lobbying efforts; both congratulated and reprimanded Companies A and B on their lobbying work; communicated directly with United States officials in connection with this work; and paid the

lobbying firms over \$2.5 million from offshore accounts he controlled, among other things.

50. Although MANAFORT had represented to the Department of Justice in November 2016 and February 2017 that he had no relevant documents, in fact MANAFORT had numerous incriminating documents in his possession, as he knew at the time. The Federal Bureau of Investigation conducted a court-authorized search of MANAFORT'S home in Virginia in the summer of 2017. The documents attached hereto as Government Exhibits 503, 504, 517, 532, 594, 604, 606, 616, 691, 692, 697, 706 and 708, among numerous others, were all documents that MANAFORT had in his possession, custody or control (and were found in the search) and all predated the November 2016 letter.

#### Money Laundering Conspiracy

51. In or around and between 2006 and 2016, MANAFORT, together with others, did knowingly and intentionally conspire (a) to conduct financial transactions, affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, to wit, felony violations of FARA in violation of Title 22, United States Code, Sections 612 and 618, knowing that the property involved in the financial transactions represented proceeds of some form of unlawful activity, with intent to engage in conduct constituting a violation of sections 7201 and 7206 of the Internal Revenue Code of 1986; and (b) to 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 specified unlawful activity, to wit: a felony violation of FARA, in violation of Title 22, United States Code, Sections 612 and 618, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(ii) and (a)(2)(A).



52. MANAFORT caused the following transfers to be made, knowing that they were being made to entities to carry on activities that were required to be timely reported under the Foreign Agents Registration Act, but were not:

Payee	Date	Payer	Originating Bank Account	Country of... Origin	Destination	Amount (USD)
Company A	8/2/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$270,000.00
	10/10/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$90,000.00
	11/16/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$120,000.00
	11/20/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$182,968.07
	12/21/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$25,000.00
	3/15/2013	Bletilla Ventures Ltd.	Hellenic Bank Account -2501	Cyprus	US	\$90,000.00
	9/18/2013	Global Endeavour Inc.	Loyal Bank Limited Account -1840	SVG*	US	\$135,937.37
	10/31/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$167,689.40
	3/28/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$135,639.65
	4/3/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$82,979.93
<b>Total Company A Transfers</b>						<b>\$1,300,214.42</b>
Company B	5/30/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$130,000.00
	8/2/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$195,000.00
	10/10/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$130,000.00
	11/16/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$50,000.00

Payee	Date	Payer	Originating Bank Account	Country of... Origin	Destination	Amount (USD)
	12/21/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$54,649.51
	3/15/2013	Bletilla Ventures Ltd.	Hellenic Bank Account -2501	Cyprus	US	\$150,000.00
	9/3/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$175,857.51
	10/31/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$195,857.51
	3/12/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$26,891.78
	3/21/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$138,026.00
	4/15/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$4,728.81
	4/25/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$4,739.23
<b>Total Company B Transfers</b>						<b>\$1,255,750.35</b>
Law Firm A	4/19/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$2,000,000.00
	5/30/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$1,000,000.00
	7/13/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$1,000,000.00
<b>Total Law Firm A Transfers</b>						<b>\$4,000,000.00</b>
<b>TOTAL TRANSFERS</b>						<b>\$6,555,964.77</b>

\* SVG refers to St. Vincent and the Grenadines.

#### MANAFORT's Hiding Of Foreign Bank Accounts And False Tax Filings

53. United States citizens who have authority over certain foreign bank accounts—whether or not the accounts are set up in the names of nominees who act for their principals—have reporting

obligations to the United States.

54. First, the Bank Secrecy Act and its implementing regulations require United States citizens to report to the United States Treasury any financial interest in, or signatory authority over, any bank account or other financial account held in foreign countries, for every calendar year in which the aggregate balance of all such foreign accounts exceeds \$10,000 at any point during the year. This is commonly known as a foreign bank account report or “FBAR.” The Bank Secrecy Act requires these reports because they have a high degree of usefulness in criminal, tax, or regulatory investigations or proceedings. The United States Treasury’s Financial Crimes Enforcement Network (FinCEN) is the custodian for FBAR filings, and FinCEN provides access to its FBAR database to law enforcement entities, including the Federal Bureau of Investigation. The reports filed by individuals and businesses are used by law enforcement to identify, detect, and deter money laundering that furthers criminal enterprise activity, tax evasion, and other unlawful activities.

55. Second, United States citizens also are obligated to report information to the IRS regarding foreign bank accounts. For instance, in 2010 Form 1040, Schedule B had a “Yes” or “No” box to record an answer to the question: “At any time during [the calendar year], did you have an interest in or a signature or other authority over a financial account in a foreign country, such as a bank account, securities account, or other financial account?” If the answer was “Yes,” then the form required the taxpayer to enter the name of the foreign country in which the financial account was located.

56. For each year in or about and between 2007 through at least 2014, MANAFORT had authority over foreign accounts that required an FBAR report. Specifically, MANAFORT was

required to report to the United States Treasury each foreign bank account held by the foreign MANAFORT entities noted above in paragraph 10. No FBAR reports were made by MANAFORT for these accounts.

57. Furthermore, in each of MANAFORT's tax filings for 2007 through 2014, Manafort represented falsely that he did not have authority over any foreign bank accounts. MANAFORT had repeatedly and falsely represented in writing to MANAFORT's tax preparer that MANAFORT had no authority over foreign bank accounts, knowing that such false representations would result in false MANAFORT tax filings. For instance, on October 4, 2011, MANAFORT's tax preparer asked MANAFORT in writing: "At any time during 2010, did you [or your wife or children] have an interest in or a signature or other authority over a financial account in a foreign country, such as a bank account, securities account or other financial account?" On the same day, MANAFORT falsely responded "NO." MANAFORT responded the same way as recently as October 3, 2016, when MANAFORT's tax preparer again emailed the question in connection with the preparation of MANAFORT's tax returns: "Foreign bank accounts etc.?" MANAFORT responded on or about the same day: "NONE."

#### MANAFORT's Fraud To Increase Access To Offshore Money

58. After MANAFORT used his offshore accounts to purchase real estate in the United States, he took out mortgages on the properties thereby allowing MANAFORT to have the benefits of liquid income without paying taxes on it. Further, MANAFORT defrauded the banks that loaned him the money so that he could withdraw more money at a cheaper rate than he otherwise would have been permitted.

59. In 2012, MANAFORT, through a corporate vehicle called "MC Soho Holdings, LLC"



owned by him and his family, bought a condominium on Howard Street in the Soho neighborhood in Manhattan, New York. He paid approximately \$2,850,000. All the money used to purchase the condominium came from MANAFORT entities in Cyprus. MANAFORT used the property from at least January 2015 through 2016 as an income-generating rental property, charging thousands of dollars a week on Airbnb, among other places. In his tax returns, MANAFORT took advantage of the beneficial tax consequences of owning this rental property.

60. Also in 2012, MANAFORT -- through a corporate vehicle called "MC Brooklyn Holdings, LLC" similarly owned by him and his family -- bought a brownstone on Union Street in the Carroll Gardens section of Brooklyn, New York. He paid approximately \$3,000,000 in cash for the property. All of that money came from a MANAFORT entity in Cyprus.

### **COUNT ONE**

#### **Conspiracy Against The United States**

61. Paragraphs 1 through 60 are incorporated here.

62. From in or about and between 2006 and 2017, both dates being approximate and inclusive, in the District of Columbia and elsewhere, the defendant PAUL J. MANAFORT, JR., together with others, including Gates and Kilimnik, 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 Department of the Treasury, and to commit offenses against the United States, to wit, (a) money laundering (in violation of 18 U.S.C. § 1956); (b) tax fraud (in violation of 26 U.S.C. § 7206(1)); (c) failing to file Foreign Bank Account Reports (in violation of 31 U.S.C. §§ 5312 and 5322(b)); (d) violating the Foreign Agents Registration Act (in violation of 22 U.S.C. §§ 612, 618(a)(1), and 618(a)(2));

and (e) lying and misrepresenting to the Department of Justice (in violation of 18 U.S.C. § 1001(a) and 22 U.S.C. §§ 612 and 618(a)(2)).

63. In furtherance of the conspiracy and to effect its illegal object, MANAFORT, together with others, committed the overt acts, in the District of Columbia and elsewhere, as set forth in the paragraphs above, which are incorporated herein.

(18 U.S.C. §§ 371 and 3551 et seq.)

## **COUNT TWO**

### **Conspiracy to Obstruct Justice (Witness Tampering)**

64. Paragraphs 1 through 60 are incorporated here.

65. From in or about and between February 23, 2018 and April 2018, both dates being approximate and inclusive, within the District of Columbia and elsewhere, the defendant PAUL J. MANAFORT, JR., together with others, including Konstantin Kilimnik, 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, in violation of 18 U.S.C. § 1512(b)(1).

66. On February 22, 2018, MANAFORT was charged in the District of Columbia in a Superseding Indictment that for the first time included allegations about the Hapsburg Group and MANAFORT's use of that group to lobby illegally in the United States in violation of the Foreign Agent Registration Act. MANAFORT knew that the Act prescribed only United States lobbying. Immediately after February 22, 2018, MANAFORT began reaching out directly and indirectly to Persons D1 and D2 to induce them to say falsely that they did not work in the United States as part

of the lobbying campaign, even though MANAFORT then and there well knew that they did lobby in the United States.

67. MANAFORT committed the following overt acts directly and through his conspirators.

Date/Time*	Sender	Receiver	Event
<i>MANAFORT contacted Person D1 by phone and a messaging application:</i>			
2/24/2018; 15:51 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
2/24/2018; 15:51 (UTC)	MANAFORT	Person D1	Phone call: 1 min, 24 second call.
2/24/2018; 15:53 (UTC)	MANAFORT	Person D1	Text: "This is paul"
2/25/2018; 18:41 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
2/26/2018; 23:56 (UTC)	MANAFORT	Person D1	Text: "http://www.businessinsider.com/former-european-leaders-manafort-hapsburg-group-2018-2?r=UK&IR=T"
2/26/2018; 23:57 (UTC)	MANAFORT	Person D1	Text: "We should talk. I have made clear that they worked in Europe."
2/27/2018; 11:03 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
2/27/2018; 11:31 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
<i>Kilimnik contacted Person D2 a messaging application, sending four messages:</i>			
2/28/2018; 01:49 (CEST)	Kilimnik	Person D2	"[Person D2], hi! How are you? Hope you are doing fine. ;))"
2/28/2018; 01:51 (CEST)	Kilimnik	Person D2	"My friend P is trying to reach [Person D1] to brief him on what's going on."
2/28/2018; 01:51 (CEST)	Kilimnik	Person D2	"If you have a chance to mention this to [Person D1] - would be great"



Date/Time*	Sender	Receiver	Event
2/28/2018; 01:53 (CEST)	Kilimnik	Person D2	“Basically P wants to give him a quick summary that he says to everybody (which is true) that our friends never lobbied in the US, and the purpose of the program was EU”
<i>Kilimnik contacted Person D2 using a different messaging application, sending five messages:</i>			
2/28/2018; 06:01 (CEST)	Kilimnik	Person D2	“Hey, how are you? This is K.”
2/28/2018; 06:01(CEST)	Kilimnik	Person D2	“Hope you are doing fine.”
2/28/2018; 06:01 (CEST)	Kilimnik	Person D2	“My friend P is trying to reach [Person D1] to brief him on what's going on”
2/28/2018; 06:02 (CEST)	Kilimnik	Person D2	“Basically P wants to give him a quick summary that he says to everybody (which is true) that our friends never lobbied in the US, and the purpose of the program was EU”
2/28/2018; 06:03 (CEST)	Kilimnik	Person D2	“If you have a chance to mention this to [First Initial of Person D1’s Name]. - it would be great. It would be good to get them connected to discuss in person. P is his friend.”
<i>Kilimnik contacted Person D2 using two different applications, sending three messages:</i>			
4/4/2018; 08:53 (CEST)	Kilimnik	Person D2	“Hey. This is Konstantin. My friend P asked me again to help connect him with [Person D1]. Can you help?”
4/4/2018; 08:54 (CEST)	Kilimnik	Person D2	“Hey. My friend P has asked me again if there is any way to help connect him through [Person D1]”
4/4/2018; 08:54 (CEST)	Kilimnik	Person D2	“I tried him on all numbers.”
<i>Kilimnik contacted Person D1 using a messaging application:</i>			
4/4/2018; 13:00 (UTC)	Kilimnik	Person D1	“Hi. This is K. My friend P is looking for ways to connect to you to pass you several messages. Can we arrange that.”

\*UTC and CEST refer to Coordinated Universal Time and Central European Summer Time, respectively.



(18 U.S.C. §§ 371 and 3551 et seq.)

**FORFEITURE ALLEGATIONS**

68. Upon conviction of the offense charged in Count One, the defendant PAUL J. MANAFORT, JR., shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property, and any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, pursuant to Title 18, United States Code, Sections 981(a)(1)(A), 981(a)(1)(C), and 982(a)(1), and Title 28, United States Code, Section 2461(c). The United States will also seek a judgment against the defendant for a sum of money representing the property described in this paragraph (to be offset by the forfeiture of any specific property).

69. The property subject to forfeiture by PAUL J. MANAFORT, JR., includes, but is not limited to, the following listed assets:

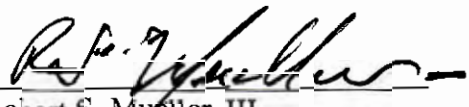
- a. The real property and premises commonly known as 377 Union Street, Brooklyn, New York 11231 (Block 429, Lot 65), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
- b. The real property and premises commonly known as 29 Howard Street, #4D, New York, New York 10013 (Block 209, Lot 1104), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
- c. The real property and premises commonly known as 174 Jobs Lane, Water Mill, New York 11976, including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;

- d. All funds held in account number XXXXXX0969 at The Federal Savings Bank, and any property traceable thereto;
- e. All funds seized from account number XXXXXX1388 at Capital One N.A., and any property traceable thereto; and
- f. All funds seized from account number XXXXXX9952 at The Federal Savings Bank, and any property traceable thereto;
- g. Northwestern Mutual Universal Life Insurance Policy 18268327, and any property traceable thereto;
- h. All funds held in account number XXXX7988 at Charles A. Schwab & Co. Inc., and any property traceable thereto; and
- i. The real property and premises commonly known as 1046 N. Edgewood Street, Arlington, Virginia 22201, including all appurtenances, improvements, and attachments thereon, and any property traceable thereto.

**Substitute Assets**

70. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States of America, pursuant to Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853, to seek forfeiture of any other property of said defendant.

By:   
Robert S. Mueller, III  
Special Counsel  
Department of Justice

# **ATTACHMENT B**



**U.S. Department of Justice**  
*The Special Counsel's Office*

Washington, D.C. 20530  
September 13, 2018

Kevin M. Downing, Esq.  
Law Office of Kevin M. Downing  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001

**FILED**

**SEP 14 2018**

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

Thomas E. Zehnle, Esq.  
Law Office of Thomas E. Zehnle  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001

Richard W. Westling, Esq.  
Epstein Becker Green  
1227 25<sup>th</sup> Street NW  
Suite 700  
Washington, DC 20037

Re: United States v. Paul J. Manafort, Jr., Crim. No. 17-201-~~7~~<sup>1</sup> (ABJ)

Dear Counsel:

This letter sets forth the full and complete plea offer to your client Paul J. Manafort, Jr. (hereinafter referred to as "your client" or "defendant") from the Special Counsel's Office (hereinafter also referred to as "the Government" or "this Office"). If your client accepts the terms and conditions of this offer, please have your client execute this document in the space provided below. Upon receipt of the executed document, this letter will become the Plea Agreement (hereinafter referred to as the "Agreement"). The terms of the offer are as follows.

**1. Charges and Statutory Penalties**

Your client agrees to plead guilty in the above-captioned case to all elements of all objects of all the charges in a Superseding Criminal Information, which will encompass the charges in Counts One and Two of a Superseding Criminal Information, charging your client with:

- A. conspiracy against the United States, in violation of 18 U.S.C. § 371 (which includes a conspiracy to: (a) money launder (in violation of 18 U.S.C. § 1956); (b) commit tax fraud

A handwritten signature in blue ink, appearing to be "P. J. Manafort, Jr.", located at the bottom right of the page.

(in violation of 26 U.S.C. § 7206(1)); (c) fail to file Foreign Bank Account Reports (in violation of 31 U.S.C. §§ 5314 and 5322(b)); (d) violate the Foreign Agents Registration Act (in violation of 22 U.S.C. §§ 612, 618(a)(1), and 618(a)(2)); and (e) to lie to the Department of Justice (in violation of 18 U.S.C. § 1001(a) and 22 U.S.C. §§ 612 and 618(a)(2)); and

- B. conspiracy against the United States, in violation of 18 U.S.C. § 371, to wit: conspiracy to obstruct justice by tampering with witnesses while on pre-trial release (in violation of 18 U.S.C. § 1512).

The defendant also agrees not to appeal any trial or pre-trial issue in the Eastern District of Virginia, or to challenge in the district court any such issue, and admits in the attached "Statement of the Offense" his guilt of the remaining counts against him in United States v. Paul J. Manafort, Jr., Crim. No. 1:18-cr-83 (TSE) (hereafter "Eastern District of Virginia.") A copy of the Superseding Criminal Information and Statement of the Offense are attached.

Your client understands that each violation of 18 U.S.C. § 371 carries a maximum sentence of 5 years' imprisonment; a fine of not more than \$250,000, pursuant to 18 U.S.C. § 3571(b)(3); a term of supervised release of not more than 3 years, pursuant to 18 U.S.C. § 3583(b)(2); and an obligation to pay any applicable interest or penalties on fines and restitution not timely made, and forfeiture.

In addition, your client agrees to pay a mandatory special assessment of \$200 to the Clerk of the United States District Court for the District of Columbia. Your client also understands that, pursuant to 18 U.S.C. § 3572 and § 5E1.2 of the United States Sentencing Guidelines, *Guidelines Manual* (2016) (hereinafter "Sentencing Guidelines," "Guidelines," or "U.S.S.G."), the Court may also impose a fine that is sufficient to pay the federal government the costs of any imprisonment, term of supervised release, and period of probation.

## **2. Factual Stipulations**

Your client agrees that the attached Statement of the Offense fairly and accurately describes and summarizes your client's actions and involvement in the offenses to which your client is pleading guilty, as well as crimes charged in the Eastern District of Virginia that remain outstanding, as well as additional acts taken by him. Please have your client sign and return the Statement of the Offense, along with this Agreement.

## **3. Additional Charges**

In consideration of your client's guilty plea to the above offenses, and upon the completion of full cooperation as described herein and fulfillment of all the other obligations herein, no additional criminal charges will be brought against the defendant for his heretofore disclosed participation in criminal activity, including money laundering, false statements, personal and corporate tax and FBAR offenses, bank fraud, Foreign Agents Registration Act violations for his work in Ukraine, and obstruction of justice. In addition, subject to the terms of this Agreement, at the time of sentence or at the completion of his successful cooperation, whichever is later, the Government will move to dismiss the remaining counts of the Indictment

in this matter and in the Eastern District of Virginia and your client waives venue as to such charges in the event he breaches this Agreement. Your client also waives all rights under the Speedy Trial act as to any outstanding charges.

#### 4. Sentencing Guidelines Analysis

Your client understands that the sentence in this case will be determined by the Court, pursuant to the factors set forth in 18 U.S.C. § 3553(a), including a consideration of the applicable guidelines and policies set forth in the Sentencing Guidelines. Pursuant to Federal Rule of Criminal Procedure 11(c)(1)(B), and to assist the Court in determining the appropriate sentence, the Office estimates the Guidelines as follows:

##### A. **Estimated Offense Level Under the Guidelines**

Base offense level	+8	2S1.1(a) Base Offense Level: (1) The offense level for the underlying offense from which the laundered funds were derived, if (A) the defendant committed the underlying offense (or would be accountable for the underlying offense under subsection (a)(1)(A) of §1B1.3 (Relevant Conduct)); and (B) the offense level for that offense can be determined; or (2) 8 plus the number of offense levels from the table in §2B1.1 (Theft, Property Destruction, and Fraud) corresponding to the value of the laundered funds, otherwise.
	+22	Using more than \$25 million threshold under 2B1.1
Enhancement	+2	2S1.1(b)(2)(B) permits enhancement for 2 points if the conviction is pursuant to §1956.
Enhancement	+2	2S1.1(b)(3) adds two points for sophisticated laundering (which the guidelines lists as involving shell corporations and offshore financial accounts.
Enhancement:	+4	3B1.1(a) aggravating role – 5 or more participants or otherwise extensive
Enhancement:	+2	3C1.1 obstruction
Combined Offense level	+0	3D1.4
Acceptance:	-3	3E1.1(b) acceptance of responsibility
Total for Counts One and Two:	<b>37</b>	<b>Advisory guidelines range of 210-262</b>

The defendant agrees that all of the Sentencing Guidelines for money laundering applicable to charges brought under 18 U.S.C. § 1956 apply to Count One of the Superseding Criminal Information brought under 18 U.S.C. § 371.

For the purposes of the Sentencing Guidelines analysis, the government calculates the highest guideline range among the offenses, namely the object of the conspiracy to violate Title 18 U.S.C. § 1956. The defendant's estimated guideline range for Count Two, the conspiracy to obstruct justice, is 30 (before any reduction for acceptance of responsibility), and would be grouped with Count One pursuant to §3D1.2(c).

### **B. Acceptance of Responsibility**

The Government agrees that a 2-level reduction will be appropriate, pursuant to U.S.S.G. § 3E1.1, provided that your client clearly demonstrates acceptance of responsibility, to the satisfaction of the Government, through your client's allocution, adherence to every provision of this Agreement, and conduct between entry of the plea and imposition of sentence. If the defendant has accepted responsibility as described above, and if the defendant pleads guilty on or before September 14, 2018, subject to the availability of the Court, an additional one-level reduction will be warranted, pursuant to U.S.S.G. § 3E1.1(b).

Nothing in this Agreement limits the right of the Government to seek denial of the adjustment for acceptance of responsibility, pursuant to U.S.S.G. § 3E1.1, and/or imposition of an adjustment for obstruction of justice, pursuant to U.S.S.G. § 3C1.1, regardless of any agreement set forth herein, should your client move to withdraw his guilty plea after it is entered, or should it be determined by the Government that your client has either (a) engaged in conduct, unknown to the Government at the time of the signing of this Agreement, that constitutes obstruction of justice, or (b) engaged in additional criminal conduct after signing this Agreement.

In accordance with the above, the applicable Guidelines Offense Level will be at least 37.

### **C. Estimated Criminal History Category**

Based upon the information now available to this Office, your client has no criminal convictions, other than in the Eastern District of Virginia. Your client acknowledges that depending on when he is sentenced here and how the Guidelines are interpreted, he may have a criminal history. If additional convictions are discovered during the pre-sentence investigation by the United States Probation Office, your client's criminal history points may increase.

### **D. Estimated Applicable Guidelines Range**

Based upon the total offense level and the estimated criminal history category set forth above, the Office calculates your client's estimated Sentencing Guidelines range is 210 months to 262 months' imprisonment (the "Estimated Guidelines Range"). In addition, the Office calculates that, pursuant to U.S.S.G. § 5E1.2, should the Court impose a fine, at Guidelines level



37, the estimated applicable fine range is \$40,000 to \$400,000. Your client reserves the right to ask the Court not to impose any applicable fine.

Your client agrees that, solely for the purposes of calculating the applicable range under the Sentencing Guidelines, a downward departure from the Estimated Guidelines Range set forth above is not warranted, subject to the paragraphs regarding cooperation below. Accordingly, you will not seek any departure or adjustment to the Estimated Guidelines Range set forth above, nor suggest that the Court consider such a departure or adjustment for any other reason other than those specified above. Your client also reserves the right to disagree with the Estimated Guideline Range calculated by the Office with respect to role in the offense. However, your client understands and acknowledges that the Estimated Guidelines Range agreed to by the Office is not binding on the Probation Office or the Court. Should the Court or Probation Office determine that a different guidelines range is applicable, your client will not be permitted to withdraw his guilty plea on that basis, and the Government and your client will still be bound by this Agreement.

Your client understands and acknowledges that the terms of this section apply only to conduct that occurred before the execution of this Agreement. Should your client engage in any conduct after the execution of this Agreement that would form the basis for an increase in your client's base offense level or justify an upward departure (examples of which include, but are not limited to, obstruction of justice, failure to appear for a court proceeding, criminal conduct while pending sentencing, and false statements to law enforcement agents, the probation officer, or the Court), the Government is free under this Agreement to seek an increase in the base offense level based on that post-agreement conduct.

##### **5. Agreement as to Sentencing Allocation**

Based upon the information known to the Government at the time of the signing of this Agreement, the parties further agree that a sentence within the Estimated Guidelines Range (or below) would constitute a reasonable sentence in light of all of the factors set forth in 18 U.S.C. § 3553(a), should such a sentence be subject to appellate review notwithstanding the appeal waiver provided below.

##### **6. Reservation of Allocation**

The Government and your client reserve the right to describe fully, both orally and in writing, to the sentencing judge, the nature and seriousness of your client's misconduct, including any misconduct not described in the charge to which your client is pleading guilty.

The parties also reserve the right to inform the presentence report writer and the Courts of any relevant facts, to dispute any factual inaccuracies in the presentence report, and to contest any matters not provided for in this Agreement. In the event that the Courts considers any Sentencing Guidelines adjustments, departures, or calculations different from any agreements contained in this Agreement, or contemplates a sentence outside the Guidelines range based upon the general sentencing factors listed in 18 U.S.C. § 3553(a), the parties reserve the right to answer any related inquiries from the Courts. In addition, your client acknowledges that the

Government is not obligated to file any post-sentence downward departure motion in this case pursuant to Rule 35(b) of the Federal Rules of Criminal Procedure.

**7. Court Not Bound by this Agreement or the Sentencing Guidelines**

Your client understands that the sentence in this case will be imposed in accordance with 18 U.S.C. § 3553(a), upon consideration of the Sentencing Guidelines. Your client further understands that the sentence to be imposed is a matter solely within the discretion of the Courts. Your client acknowledges that the Courts are not obligated to follow any recommendation of the Government at the time of sentencing or to grant a downward departure based on your client's substantial assistance to the Government, even if the Government files a motion pursuant to Section 5K1.1 of the Sentencing Guidelines. Your client understands that neither the Government's recommendation nor the Sentencing Guidelines are binding on the Courts.

Your client acknowledges that your client's entry of a guilty plea to the charged offenses authorizes the Court to impose any sentence, up to and including the statutory maximum sentence, which may be greater than the applicable Guidelines range determined by the Court. Although the parties agree that the sentences here and in the Eastern District of Virginia should run concurrently to the extent there is factual overlap (i.e. the tax and foreign bank account charges), that recommendation is not binding on either Court. The Government cannot, and does not, make any promise or representation as to what sentences your client will receive. Moreover, your client acknowledges that your client will have no right to withdraw your client's plea of guilty should the Courts impose sentences that are outside the Guidelines range or if the Courts do not follow the Government's sentencing recommendation. The Government and your client will be bound by this Agreement, regardless of the sentence imposed by the Courts. Any effort by your client to withdraw the guilty plea because of the length of the sentence shall constitute a breach of this Agreement.

**8. Cooperation**

Your client shall cooperate fully, truthfully, completely, and forthrightly with the Government and other law enforcement authorities identified by the Government in any and all matters as to which the Government deems the cooperation relevant. This cooperation will include, but is not limited to, the following:

- (a) The defendant agrees to be fully debriefed and to attend all meetings at which his presence is requested, concerning his participation in and knowledge of all criminal activities.
- (b) The defendant agrees to furnish to the Government all documents and other material that may be relevant to the investigation and that are in the defendant's possession or control and to participate in undercover activities pursuant to the specific instructions of law enforcement agents or the Government.
- (c) The defendant agrees to testify at any proceeding in the District of Colombia or elsewhere as requested by the Government.

- (d) The defendant consents to adjournments of his sentences as requested by the Government.
- (e) The defendant agrees that all of the defendant's obligations under this agreement continue after the defendant is sentenced here and in the Eastern District of Virginia; and
- (f) The defendant must at all times give complete, truthful, and accurate information and testimony, and must not commit, or attempt to commit, any further crimes.

Your client acknowledges and understands that, during the course of the cooperation outlined in this Agreement, your client will be interviewed by law enforcement agents and/or Government attorneys. Your client waives any right to have counsel present during these interviews and agrees to meet with law enforcement agents and Government attorneys outside of the presence of counsel. If, at some future point, you or your client desire to have counsel present during interviews by law enforcement agents and/or Government attorneys, and you communicate this decision in writing to this Office, this Office will honor this request, and this change will have no effect on any other terms and conditions of this Agreement.

Your client shall testify fully, completely and truthfully before any and all Grand Juries in the District of Columbia and elsewhere, and at any and all trials of cases or other court proceedings in the District of Columbia and elsewhere, at which your client's testimony may be deemed relevant by the Government.

Your client understands and acknowledges that nothing in this Agreement allows your client to commit any criminal violation of local, state or federal law during the period of your client's cooperation with law enforcement authorities or at any time prior to the sentencing in this case. The commission of a criminal offense during the period of your client's cooperation or at any time prior to sentencing will constitute a breach of this Agreement and will relieve the Government of all of its obligations under this Agreement, including, but not limited to, its obligation to inform this Court of any assistance your client has provided. However, your client acknowledges and agrees that such a breach of this Agreement will not entitle your client to withdraw your client's plea of guilty or relieve your client of the obligations under this Agreement.

Your client agrees that the sentencing in this case and in the Eastern District of Virginia may be delayed until your client's efforts to cooperate have been completed, as determined by the Government, so that the Courts will have the benefit of all relevant information before a sentence is imposed.

**9. Government's Obligations**

The Government will bring to the Courts' attention at the time of sentencing the nature and extent of your client's cooperation or lack of cooperation. The Government will evaluate the full nature and extent of your client's cooperation to determine whether your client has provided substantial assistance in the investigation or prosecution of another person who has committed an offense. If this Office determines that the defendant has provided substantial assistance in the form of truthful information and, where applicable, testimony, the Office will file motions pursuant to Section 5K1.1 of the United States Sentencing Guidelines. Defendant will then be free to argue for any sentence below the advisory Sentencing Guidelines range calculated by the Probation Office, including probation.

10. **Waivers**

A. **Venue**

Your client waives any challenge to venue in the District of Columbia.

B. **Statute of Limitations**

Your client agrees that, should any plea or conviction following your client's pleas of guilty pursuant to this Agreement, or the guilty verdicts in the Eastern District of Virginia, be vacated, set aside, or dismissed for any reason (other than by government motion as set forth herein), any prosecution based on the conduct set forth in the attached Statement of the Offense, as well as any crimes that the Government has agreed not to prosecute or to dismiss pursuant to this Agreement, that is not time-barred by the applicable statute of limitations on the date of the signing of this Agreement, may be commenced or reinstated against your client, notwithstanding the expiration of the statute of limitations between the signing of this Agreement and the commencement or reinstatement of such prosecution. It is the intent of this Agreement to waive all defenses based on the statute of limitations with respect to any prosecution of conduct set forth in the attached Statement of the Offense, or any other crimes that the Government has agreed not to prosecute, that are not time-barred on the date that this Agreement is signed. The Office and any other party will be free to use against your client, directly and indirectly, in any criminal or civil proceeding, all statements made by your client, including the Statement of the Offense, and any of the information or materials provided by your client, including such statements, information, and materials provided pursuant to this Agreement or during the course of any debriefings conducted in anticipation of, or after entry of, this Agreement, whether or not the debriefings were previously a part of proffer-protected debriefings, and your client's statements made during proceedings before the Court pursuant to Rule 11 of the Federal Rules of Criminal Procedure.

C. **Trial and Other Rights**

Your client understands that by pleading guilty in this case your client agrees to waive certain rights afforded by the Constitution of the United States and/or by statute or rule. Your client agrees to forgo the right to any further discovery or disclosures of information not already provided at the time of the entry of your client's guilty plea. Your client also agrees to waive,



among other rights, the right to be indicted by a Grand Jury, the right to plead not guilty, and the right to a jury trial. If there were a jury trial, your client would have the right to be represented by counsel, to confront and cross-examine witnesses against your client, to challenge the admissibility of evidence offered against your client, to compel witnesses to appear for the purpose of testifying and presenting other evidence on your client's behalf, and to choose whether to testify. If there were a jury trial and your client chose not to testify at that trial, your client would have the right to have the jury instructed that your client's failure to testify could not be held against your client. Your client would further have the right to have the jury instructed that your client is presumed innocent until proven guilty, and that the burden would be on the United States to prove your client's guilt beyond a reasonable doubt. If your client were found guilty after a trial, your client would have the right to appeal your client's conviction. Your client understands that the Fifth Amendment to the Constitution of the United States protects your client from the use of compelled self-incriminating statements in a criminal prosecution. By entering a plea of guilty, your client knowingly and voluntarily waives or gives up your client's right against compelled self-incrimination.

Your client acknowledges discussing with you Rule 11(f) of the Federal Rules of Criminal Procedure and Rule 410 of the Federal Rules of Evidence, which ordinarily limit the admissibility of statements made by a defendant in the course of plea discussions or plea proceedings if a guilty plea is later withdrawn. Your client knowingly and voluntarily hereby waives the rights that arise under these rules to object to the use of all such statements by him on and after September 10, 2018, in the event your client breaches this agreement, withdraws his guilty plea, or seeks to withdraw from this Agreement after signing it. This Agreement supersedes the proffer agreement between the Government and the client.

Your client also agrees to waive all constitutional and statutory rights to a speedy sentence and agrees that the pleas of guilty pursuant to this Agreement will be entered at a time decided upon by the parties with the concurrence of the Court. Your client understands that the date for sentencing will be set by the Courts.

Your client agrees not to accept remuneration or compensation of any sort, directly or indirectly, for the dissemination through any means, including but not limited to books, articles, speeches, blogs, podcasts, and interviews, however disseminated, regarding the conduct encompassed by the Statement of the Offense, or the investigation by the Office or prosecution of any criminal or civil cases against him.

#### **D. Appeal Rights**

Your client understands that federal law, specifically 18 U.S.C. § 3742, affords defendants the right to appeal their sentences in certain circumstances. Your client agrees to waive the right to appeal the sentences in this case and the Eastern District of Virginia, including but not limited to any term of imprisonment, fine, forfeiture, award of restitution, term or condition of supervised release, authority of the Courts to set conditions of release, and the manner in which the sentences were determined, except to the extent the Courts sentence your client above the statutory maximum or guidelines range determined by the Courts or your client claims that your client received ineffective assistance of counsel, in which case your client would

have the right to appeal the illegal sentence or above-guidelines sentence or raise on appeal a claim of ineffective assistance of counsel, but not to raise on appeal other issues regarding the sentencings. In agreeing to this waiver, your client is aware that your client's sentences have yet to be determined by the Courts. Realizing the uncertainty in estimating what sentences the Courts ultimately will impose, your client knowingly and willingly waives your client's right to appeal the sentence, to the extent noted above, in exchange for the concessions made by the Government in this Agreement.

#### **E. Collateral Attack**

Your client also waives any right to challenge the conviction entered or sentence imposed under this Agreement or in the Eastern District of Virginia or otherwise attempt to modify or change the sentences or the manner in which they were determined in any collateral attack, including, but not limited to, a motion brought under 28 U.S.C. § 2255 or Federal Rule of Civil Procedure 60(b), except to the extent such a motion is based on a claim that your client received ineffective assistance of counsel.

Your client agrees that with respect to all charges referred to herein he is not a "prevailing party" within the meaning of the "Hyde Amendment," 18 U.S.C. § 3006A note, and will not file any claim under that law.

#### **F. Privacy Act and FOIA Rights**

Your client also agrees to waive all rights, whether asserted directly or by a representative, to request or receive from any department or agency of the United States any records pertaining to the investigation or prosecution of this case, including and without limitation any records that may be sought under the Freedom of Information Act, 5 U.S.C. § 552, or the Privacy Act, 5 U.S.C. § 552a, for the duration of the Special Counsel's investigation.

#### **11. Restitution**

Your client understands that the Court has an obligation to determine whether, and in what amount, mandatory restitution applies in this case under 18 U.S.C. § 3663A. The Government and your client agree that mandatory restitution does not apply in this case.

#### **12. Forfeiture**

a) Your client agrees to the forfeiture set forth in the Forfeiture Allegations in the Superseding Criminal Information to which your client is pleading guilty. Your client further agrees to forfeit criminally and civilly the following properties (collectively, the "Forfeited Assets") to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(A), 981(a)(1)(C), 982(a)(1), 982(a)(2); Title 21, United States Code, Section 853(p), and Title 28 U.S.C. § 2461(c), and further agrees to waive all interest in such assets in any administrative or judicial forfeiture proceeding, whether criminal or civil, state or federal:

- 1) The real property and premises commonly known as 377 Union Street, Brooklyn, New



- York 11231 (Block 429, Lot 65), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
- 2) The real property and premises commonly known as 29 Howard Street, #4D, New York, New York 10013 (Block 209, Lot 1104), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
  - 3) The real property and premises commonly known as 174 Jobs Lane, Water Mill, New York 11976, including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
  - 4) All funds held in account number 0969 at The Federal Savings Bank, and any property traceable thereto;
  - 5) All funds seized from account number 1388 at Capital One N.A., and any property traceable thereto;
  - 6) All funds seized from account number 9952 at The Federal Savings Bank, and any property traceable thereto;
  - 7) Northwestern Mutual Universal Life Insurance Policy and any property traceable thereto;
  - 8) The real property and premises commonly known as 123 Baxter Street, #5D, New York, New York 10016 in lieu of 1046 N. Edgewood Street; and
  - 9) The real property and premises commonly known as 721 Fifth Avenue, #43G, New York, New York 10022 in lieu of all funds from account number at Charles Schwab & Co. Inc., and any property traceable thereto.

Your client agrees that his consent to forfeiture is final and irrevocable as to his interests in the Forfeited Assets.

b) Your client agrees that the facts set forth in the Statement of Facts and admitted to by your client establish that the Forfeited Assets are forfeitable to the United States pursuant to Title 18, United States Code, Sections 981 and 982, Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461. Your client admits that the Forfeited Assets numbered 1 through 7, above, represent property that constitutes or is derived from proceeds of, and property involved in, the criminal offenses in the Superseding Criminal Information to which your client is pleading guilty. Your client further agrees that all the Forfeited Assets (numbered 1 through 9) can additionally be considered substitute assets for the purpose of forfeiture to the United States pursuant to Title 18, United States Code, Section 982(b); Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c).

c) Your client agrees that the Court may enter a preliminary order of forfeiture for the Forfeited Assets at the time of your client's guilty plea or at any time before sentencing, and consents thereto. Your client agrees that the Court can enter a Final Order of Forfeiture for the Forfeited Assets, and could do so as part of his sentence.

d) Your client further agrees that the government may choose in its sole discretion how it wishes to accomplish forfeiture of the property whose forfeiture your client has consented to in this plea agreement, whether by criminal or civil forfeiture, using judicial or non-judicial forfeiture processes. If the government chooses to effect the forfeiture provisions of this plea agreement through the criminal forfeiture process, your client agrees to the entry of orders of forfeiture for such property and waives the requirements of Federal Rules of Criminal Procedure 11(b)(1)(J) and 32.2 regarding notice of the forfeiture in the charging instrument, advice regarding the forfeiture at the change-of-plea hearing, announcement of the forfeiture at sentencing, and incorporation of the forfeiture in the judgment.

e) Your client understands that the United States may institute civil or administrative forfeiture proceedings against all forfeitable property in which your client has an interest, including the Forfeited Assets, without regard to the status of his criminal conviction. Your client further consents to the civil forfeiture of the Forfeited Assets to the United States, without regard to the status of his criminal conviction. In connection therewith, your client specifically agrees to waive all right, title, and interest in the Forfeited Assets, both individually and on behalf of DMP International, Summerbreeze LLC, or any other entity of which he is an officer, member, or has any ownership interest. Your client waives all defenses based on statute of limitations and venue with respect to any administrative or civil forfeiture proceeding related to the Forfeited Assets.

f) Your client represents that with respect to each of the Forfeited Assets, he is either the sole and rightful owner and that no other person or entity has any claim or interest, or that he has secured the consent from any other individuals or entities having an interest in the Forfeited Assets to convey their interests in the Forfeited Assets to him prior to entry of the Order of Forfeiture (with the exception of previously disclosed mortgage holders). Your client warrants that he has accurately represented to the Government all those individuals and entities having an interest in the Forfeited Assets and the nature and extent of those interests, including any mortgages or liens on the Forfeited Assets. Your client agrees to take all steps to pass clear title to the Forfeited Assets to the United States (with the exception of previously disclosed mortgage liens). Your client further agrees to testify truthfully in any judicial forfeiture proceeding, and to take all steps to effectuate the same as requested by the Government. Your client agrees to take all steps requested by the Government to obtain from any other parties by any lawful means any records of assets owned at any time by your client, including but not limited to the Forfeited Assets, and to otherwise facilitate the effectuation of forfeiture and the maximization of the value of Forfeited Assets for the United States.

g) Your client agrees that, to the extent that he does not convey to the United States

clear title to each of the Forfeited Assets, the United States is entitled, in its sole discretion, either to vacatur of the plea agreement or to forfeiture to the United States of a sum of money equal to the value of that asset at the time this agreement was executed. Your client consents to modification of any Order of Forfeiture at any point to add such sum of money as a forfeiture judgment in substitution for Forfeited Assets.

h) Your client hereby abandons any interest he has in all forfeitable property and consents to any disposition of the property by the government without further notice or obligation whatsoever owing to your client.

i) Your client agrees not to interpose any claim, or to assist others to file or interpose any claim, to the Forfeited Assets in any proceeding, including but not limited to any civil or administrative forfeiture proceedings and any ancillary proceedings related to criminal forfeiture. Your client agrees that he shall not file any petitions for remission, restoration, or any other assertion of ownership or request for return relating to the Forfeited Assets, or any other action or motion seeking to collaterally attack the seizure, restraint, forfeiture, or conveyance of the Forfeited Assets, nor shall your client assist any other in filing any such claims, petitions, actions, or motion. Contesting or assisting others in contesting forfeiture shall constitute a material breach of the Agreement, relieving the United States of all its obligations under the Agreement. Your client agrees not to seek or accept, directly or indirectly, reimbursement or indemnification from any source with regard to the assets forfeited pursuant to this Agreement.

j) In the event your client fails to deliver the assets forfeited pursuant to this agreement, or in any way fails to adhere to the forfeiture provisions of this agreement, the United States reserves all remedies available to it, including but not limited to vacating the Agreement based on a breach of the Agreement by your client.

k) Your client agrees that the forfeiture provisions of this plea agreement are intended to, and will, survive him notwithstanding the abatement of any underlying criminal conviction after the execution of this Agreement.

l) Your client agrees that he will not claim, assert, or apply for, directly or indirectly, any tax deduction, tax credit, or any other taxable offset with regard to any federal, state, or local tax or taxable income for payments of any assets forfeited pursuant to this Agreement.

m) Your client agrees to waive all constitutional and statutory challenges in any manner (including, but not limited to, direct appeal) to any forfeiture carried out in accordance with this Agreement on any grounds, including that the forfeiture constitutes an excessive fine or punishment.

### 13. Breach of Agreement

Your client understands and agrees that, if after entering this Agreement, your client fails specifically to perform or to fulfill completely each and every one of your client's obligations under this Agreement, or engages in any criminal activity prior to sentencing or during his cooperation (whichever is later), your client will have breached this Agreement. Should it be judged by the Government in its sole discretion that the defendant has failed to cooperate fully, has intentionally given false, misleading or incomplete information or testimony, has committed or attempted to commit any further crimes, or has otherwise violated any provision of this agreement, the defendant will not be released from his pleas of guilty but the Government will be released from its obligations under this agreement, including (a) not to oppose a downward adjustment of two levels for acceptance of responsibility described above, and to make the motion for an additional one-level reduction described above and (b) to file the motion for a downward departure for cooperation described above. Moreover, the Government may withdraw the motion described above, if such motion has been filed prior to sentencing. In the event that it is judged by the Government that there has been a breach: (a) your client will be fully subject to criminal prosecution, in addition to the charges contained in the Superseding Criminal Information, for any crimes to which he has not pled guilty, including perjury and obstruction of justice; and (b) the Government and any other party will be free to use against your client, directly and indirectly, in any criminal or civil proceeding, all statements made by your client, including the Statement of the Offense, and any of the information or materials provided by your client, including such statements, information, and materials provided pursuant to this Agreement or during the course of any debriefings conducted in anticipation of, or after entry of, this Agreement, whether or not the debriefings were previously a part of proffer-protected debriefings, and your client's statements made during proceedings before the Court pursuant to Rule 11 of the Federal Rules of Criminal Procedure.

Your client understands and agrees that the Government shall be required to prove a breach of this Agreement only by good faith.

Nothing in this Agreement shall be construed to protect your client from prosecution for any crimes not included within this Agreement or committed by your client after the execution of this Agreement. Your client understands and agrees that the Government reserves the right to prosecute your client for any such offenses. Your client further understands that any perjury, false statements or declarations, or obstruction of justice relating to your client's obligations under this Agreement shall constitute a breach of this Agreement. In the event of such a breach, your client will not be allowed to withdraw your client's guilty plea.

### 14. Complete Agreement

Apart from the written proffer agreement initially dated September 11, 2018, which this Agreement supersedes, no agreements, promises, understandings, or representations have been

made by the parties or their counsel other than those contained in writing herein, nor will any such agreements, promises, understandings, or representations be made unless committed to writing and signed by your client, defense counsel, and the Office.

Your client further understands that this Agreement is binding only upon the Office. This Agreement does not bind any United States Attorney's Office, nor does it bind any other state, local, or federal prosecutor. It also does not bar or compromise any civil, tax, or administrative claim pending or that may be made against your client.

If the foregoing terms and conditions are satisfactory, your client may so indicate by



signing this Agreement and the Statement of the Offense, and returning both to the Office no later than September 14, 2018.

Sincerely yours,

ROBERT S. MUELLER, III  
Special Counsel

By:



Andrew Weissmann

Jeannie S. Rhee

Greg D. Andres

Kyle R. Freeny

Senior/Assistant Special Counsels






DEFENDANT'S ACCEPTANCE

I have read every page of this Agreement and have discussed it with my attorneys Kevin Downing, Thomas Zehnle, and Richard Westling. I am fully satisfied with the legal representation by them, who I have chosen to represent me herein. Nothing about the quality of the representation of other counsel is affecting my decision herein to plead guilty. I fully understand this Agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Agreement fully. I am pleading guilty because I am in fact guilty of the offense identified in this Agreement.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in this Agreement. I am satisfied with the legal services provided by my attorneys in connection with this Agreement and matters related to it.


Date: 9-13-18

  
\_\_\_\_\_  
Paul J. Manafort, Jr.  
Defendant

ATTORNEYS' ACKNOWLEDGMENT

I have read every page of this Agreement, reviewed this Agreement with my client, Paul J. Manafort, and fully discussed the provisions of this Agreement with my client. These pages accurately and completely set forth the entire Agreement. I concur in my client's desire to plead guilty as set forth in this Agreement.

Date: 9-13-2018

  
\_\_\_\_\_  
Kevin M. Downing  
Richard W. Westling  
Thomas E. Zehnle  
Attorneys for Defendant

**FILED**

**SEP 14 2018**

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

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CRIMINAL NO. 17-201-1 (ABJ)

Violations: 18 U.S.C. § 371  
(Conspiracy Against the United States  
and Conspiracy to Obstruct Justice)

**STATEMENT OF THE OFFENSES AND OTHER ACTS**

Pursuant to the Federal Rules of Criminal Procedure 11, the United States and the defendant PAUL J. MANAFORT, JR. (MANAFORT) stipulate and agree that the following facts are true and accurate. These facts do not constitute all of the facts known to the parties concerning the charged offense and covered conduct. This statement is being submitted by the parties to demonstrate that sufficient facts exist to establish that the defendant committed the offenses to which he is pleading guilty.

**Count 1: Conspiracy Against the United States (18 U.S.C. § 371)**

1. At all relevant times herein, MANAFORT was an owner of Davis Manafort Partners, Inc. (DMP) or DMP International, LLC (DMI) or both. MANAFORT engaged in a variety of criminal schemes, and knowingly, intentionally, and willfully conspired with Richard W. Gates, Konstantin Kilimnik, and others to carry out the criminal schemes that make up Counts One and Two of the Information, as more fully set forth below.

**A. FARA Conspiracy  
22 U.S.C. §§ 612 and 618(a)(1)**

**MANAFORT's Lobbying in the United States on Behalf of the Government of Ukraine**



2. MANAFORT knew it was illegal to lobby government officials and engage in public relations activities (hereinafter collectively referred to as lobbying) in the United States on behalf of a foreign government or political party, without registering with the United States Government under the Foreign Agents Registration Act. MANAFORT knew he was lobbying in the United States for the Government of Ukraine, President Viktor F. Yanukovich, the Party of Regions, and the Opposition Bloc (the latter two being political parties in Ukraine), and thus he was supposed to submit a written registration statement to the United States Department of Justice. MANAFORT knew that the filing was required to disclose the name of the foreign country, all the financial payments to the lobbyist, and the specific steps undertaken for the foreign country in the United States, among other information.

3. MANAFORT knew that Ukraine had a strong interest in the United States' taking economic and policy positions favorable to Ukraine, including not imposing sanctions on Ukraine. MANAFORT also knew that the trial and treatment of President Yanukovich's political rival, former Prime Minister Yulia Tymoshenko, was strongly condemned by leading United States executive and legislative branch officials, and was a major hurdle to improving United States and Ukraine relations.

4. From 2006 until 2015, MANAFORT led a multi-million dollar lobbying campaign in the United States at the direction of the Government of Ukraine, President Yanukovich, the Party of Regions, and the Opposition Bloc. MANAFORT intentionally did so without registering and providing the disclosures required by law.

5. As part of the lobbying scheme, MANAFORT hired numerous firms and people to assist in his lobbying campaign in the United States. He hired Companies A, B, C, D, and E, and Law Firm A, among others, to participate in what he described to President Yanukovich in writing as a global

“Engage Ukraine” lobbying campaign that he devised and led. These companies and law firm were paid the equivalent of over \$11 million for their Ukraine work.

6. MANAFORT viewed secrecy for himself and for the actions of his lobbyists as integral to the effectiveness of the lobbying offensive he orchestrated for Ukraine. Filing under the Foreign Agents Registration Act would have thwarted the secrecy MANAFORT sought in order to conduct an effective campaign for Ukraine to influence both American leaders and the American public.

7. MANAFORT took steps to avoid any of these firms and people disclosing their lobbying efforts under the Foreign Agents Registration Act. As one example, even though MANAFORT engaged Company E in 2007 to lobby in the United States for the Government of Ukraine, MANAFORT tried to dissuade Company E from filing under the Foreign Agents Registration Act. Only after MANAFORT ceased to use Company E in the fall of 2007 did Company E disclose its work for Ukraine, in a belated filing under the Act in 2008.

8. MANAFORT took other measures to keep the Ukraine lobbying as secret as possible. For example, MANAFORT, in written communications on or about May 16, 2013, directed his lobbyists (including Persons D1 and D2, who worked for Company D) to write and disseminate within the United States news stories that alleged that Tymoshenko had paid for the murder of a Ukrainian official. MANAFORT stated that it should be “push[ed]” “[w]ith no fingerprints.” “It is very important we have no connection.” MANAFORT stated that “[m]y goal is to plant some stink on Tymo.” Person D1 objected to the plan, but ultimately Persons D1 and D2 complied with MANAFORT’s direction. The Foreign Agents Registration Act required MANAFORT to disclose such lobbying, as MANAFORT knew. He did not.

#### The Hapsburg Group and Company D

9. As part of the lobbying scheme, starting in 2011, MANAFORT secretly retained Company



D and a group of four former European heads of state and senior officials (including a former Austrian Chancellor, Italian Prime Minister, and Polish President) to lobby in the United States and Europe on behalf of Ukraine. The former politicians, called the Hapsburg Group by MANAFORT, appeared to be providing solely their independent assessments of Government of Ukraine policies, when in fact they were paid by Ukraine. MANAFORT explained in an "EYES ONLY" memorandum in or about June 2012 that his purpose was to "assemble a small group of high-level European influential [sic] champions and politically credible friends who can act informally and without any visible relationship with the Government of Ukraine."

10. Through MANAFORT, the Government of Ukraine retained an additional group of lobbyists (Company D and Persons D1 and D2). In addition to lobbying itself, Company D secretly served as intermediaries between the Hapsburg Group and MANAFORT and the Government of Ukraine. In or about 2012 through 2013, MANAFORT directed more than the equivalent of 700,000 euros to be wired from at least three of his offshore accounts to the benefit of Company D to pay secretly for its services.

11. All four Hapsburg Group members, at the direction, and with the direct assistance, of MANAFORT, advocated positions favorable to Ukraine in meetings with United States lawmakers, interviews with United States journalists, and ghost written op-eds in American publications. In or about 2012 through 2014, MANAFORT directed more than 2 million euros to be wired from at least four of his offshore accounts to pay secretly the Hapsburg Group. To avoid European taxation, the contract with the Hapsburg Group falsely stated that none of its work would take place in Europe.

12. One of the Hapsburg Group members, a former Polish President, was also a representative of the European Parliament with oversight responsibility for Ukraine. MANAFORT solicited that



official to provide MANAFORT inside information about the European Parliament's views and actions toward Ukraine and to take actions favorable to Ukraine. MANAFORT also used this Hapsburg Group member's current European Parliament position to Ukraine's advantage in his lobbying efforts in the United States. In the fall of 2012, the United States Senate was considering and ultimately passed a resolution critical of President Yanukovich's treatment of former Prime Minister Tymoshenko. MANAFORT engaged in an all-out campaign to try to kill or delay the passage of this resolution. Among the steps he took was having the Hapsburg Group members reach out to United States Senators, as well as directing Companies A and B to have private conversations with Senators to lobby them to place a "hold" on the resolution. MANAFORT told his lobbyists to stress to the Senators that the former Polish President who was advocating against the resolution was currently a designated representative of the President of the European Parliament, to give extra clout to his supposedly independent judgment against the Senate resolution. MANAFORT never revealed to the Senators or to the American public that any of these lobbyists or Hapsburg Group members were paid by Ukraine.

13. In another example, on May 16, 2013, another member of the Hapsburg Group lobbied in the United States for Ukraine. The Hapsburg Group member accompanied his country's prime minister to the Oval Office and met with the President and Vice President of the United States, as well as senior United States officials in the executive and legislative branches. In written communications sent to MANAFORT, Person D1 reported that the Hapsburg Group member delivered the message of not letting "Russians Steal Ukraine from the West." The Foreign Agents Registration Act required MANAFORT to disclose such lobbying, as MANAFORT knew. He did not.

Law Firm Report and Tymoshenko



14. As another part of the lobbying scheme, in 2012, on behalf of President Yanukovych and the Government of Ukraine's Ministry of Justice, MANAFORT solicited a United States law firm to write a report evaluating the trial of Yanukovych's political opponent Yulia Tymoshenko. MANAFORT caused Ukraine to hire the law firm so that its report could be used in the United States and elsewhere to defend the Tymoshenko criminal trial and argue that President Yanukovych and Ukraine had not engaged in selective prosecution.

15. MANAFORT retained a public relations firm (Company C) to prepare a media roll-out plan for the law firm report. MANAFORT used one of his offshore accounts to pay Company C the equivalent of more than \$1 million for its services.

16. MANAFORT worked closely with Company C to develop a detailed written lobbying plan in connection with what MANAFORT termed the "selling" of the report. This campaign included getting the law firm's report "seeded" to the press in the United States—that is, to leak the report ahead of its official release to a prominent United States newspaper and then use that initial article to influence reporting globally. As part of the roll-out plan, on the report's issuance on December 13, 2012, MANAFORT arranged to have the law firm disseminate hard copies of the report to numerous government officials, including senior United States executive and legislative branch officials.

17. MANAFORT reported on the law firm's work on the report and Company C's lobbying plan to President Yanukovych and other representatives of the Government of Ukraine. For example, in a July 27, 2012 memorandum to President Yanukovych's Chief of Staff, MANAFORT reported on "the global rollout strategy for the [law firm's] legal report, and provide[d] a detailed plan of action[]" which included step-by-step lobbying outreach in the United States.

18. MANAFORT directed lobbyists to tout the report as showing that President Yanukovych

had not selectively prosecuted Tymoshenko. But in November 2012 MANAFORT had been told privately in writing by the law firm that the evidence of Tymoshenko's criminal intent "is virtually non-existent" and that it was unclear even among legal experts that Tymoshenko lacked power to engage in the conduct central to the Ukraine criminal case. These facts, known by MANAFORT, were not disclosed to the public.

19. MANAFORT knew that the report also did not disclose that the law firm, in addition to being retained to write the report, was retained to represent Ukraine itself, including in connection with the Tymoshenko case and to provide training to the trial team prosecuting Tymoshenko.

20. MANAFORT also knew that the Government of Ukraine did not want to disclose how much the report cost. More than \$4.6 million was paid to the law firm for its work. MANAFORT used one of his offshore accounts to funnel \$4 million to pay the law firm, a fact that MANAFORT did not disclose to the public. Instead, the Government of Ukraine reported falsely that the report cost just \$12,000.

21. MANAFORT and others knew that the actual cost of the report and the scope of the law firm's work would undermine the report's being perceived as an independent assessment and thus being an effective lobbying tool for MANAFORT to use to support the incarceration of President Yanukovich's political opponent.

22. In addition to the law firm report, MANAFORT took other steps on behalf of the Government of Ukraine to tarnish Tymoshenko in the United States. In addition to disseminating stories about her soliciting murder, noted above, in October 2012, MANAFORT orchestrated a scheme to have, as he wrote in a contemporaneous communication, "[O]bama jews" put pressure on the Administration to disavow Tymoshenko and support Yanukovich. MANAFORT sought to undermine United States support for Tymoshenko by spreading stories in the United States that





a senior Cabinet official (who had been a prominent critic of Yanukovych's treatment of Tymoshenko) was supporting anti-Semitism because the official supported Tymoshenko, who in turn had formed a political alliance with a Ukraine party that espoused anti-Semitic views. MANAFORT coordinated privately with a senior Israeli government official to issue a written statement publicizing this story. MANAFORT then, with secret advance knowledge of that Israeli statement, worked to disseminate this story in the United States, writing to Person D1 "I have someone pushing it on the NY Post. Bada bing bada boom." MANAFORT sought to have the Administration understand that "the Jewish community will take this out on Obama on election day if he does nothing." MANAFORT then told his United States lobbyist to inform the Administration that Ukraine had worked to prevent the Administration's presidential opponent from including damaging language in the Israeli statement, so as not to harm the Administration, and thus further ingratiate Yanukovych with the Administration.

Company A and Company B

23. As a third part of the lobbying scheme, in February 2012, MANAFORT solicited two Washington, D.C. lobbying firms (Company A and Company B) to lobby in the United States on behalf of President Yanukovych, the Party of Regions and the Government of Ukraine. For instance, in early 2012 at the inception of the relationship, Company B wrote in an email to its team about a "potential representation for the Ukraine," having been contacted "at the suggestion of Paul Manafort who has been working on the current PM elections."

24. MANAFORT arranged to pay Companies A and B over \$2 million from his offshore accounts for their United States lobbying work for Ukraine.

25. MANAFORT provided direction to Companies A and B in their lobbying efforts, including providing support for numerous United States visits by numerous senior Ukrainian officials.

Companies A and B, at MANAFORT's direction, engaged in extensive United States lobbying. Among other things, they lobbied dozens of Members of Congress, their staff, and White House and State Department officials about Ukraine sanctions, the validity of Ukraine elections, and the propriety of President Yanukovich's imprisoning Tymoshenko, his presidential rival.

26. In addition, with the assistance of Company A, MANAFORT also personally lobbied in the United States. He drafted and edited numerous ghost-written op-eds for publication in United States newspapers. He also personally met in March 2013 in Washington, D.C., with a Member of Congress who was on a subcommittee that had Ukraine within its purview. After the meeting, MANAFORT prepared a report for President Yanukovich that the meeting "went well" and reported a series of positive developments for Ukraine from the meeting.

27. Indeed, MANAFORT repeatedly communicated in person and in writing with President Yanukovich and his staff about the lobbying activities of Companies A and B and he tasked the companies to prepare assessments of their work so he, in turn, could brief President Yanukovich. For instance, MANAFORT wrote President Yanukovich a memorandum dated April 8, 2012, in which he provided an update on the lobbying firms' activities "since the inception of the project a few weeks ago. It is my intention to provide you with a weekly update moving forward." In November 2012, Gates wrote to Companies A and B that the firms needed to prepare an assessment of their past and prospective lobbying efforts so the "President" could be briefed by "Paul" "on what Ukraine has done well and what it can do better as we move into 2013." The resulting memorandum from Companies A and B, with input from Gates, noted among other things that the "client" had not been as successful as hoped given that it had an Embassy in Washington.

28. To distance their United States lobbying work from the Government of Ukraine, and to avoid having to register as agents of Ukraine under the Foreign Agents Registration Act,



MANAFORT with others arranged for Companies A and B to be engaged by a newly-formed Brussels entity called the European Centre for the Modern Ukraine (the Centre), instead of directly by the Government of Ukraine.

29. MANAFORT described the Centre as “the Brussels NGO that we have formed” to coordinate lobbying for Ukraine. The Centre was founded by a Ukraine Party of Regions member and Ukraine First Vice-Prime Minister. The head of its Board was another member of the Party of Regions, who became the Ukraine Foreign Minister.

30. In spite of these ties to Ukraine, MANAFORT and others arranged for the Centre to represent falsely that it was not “directly or indirectly supervised, directed, [or] controlled” in whole or in major part by the Government of Ukraine or the Party of Regions. MANAFORT knew that the false and misleading representations would lead Companies A and B not to register their activities pursuant to the Foreign Agents Registration Act.

31. Despite the Centre being the ostensible client of Companies A and B, MANAFORT knew that the Centre did not direct or oversee their work. The firms received direction from MANAFORT and his subordinate Gates, on behalf of the Government of Ukraine.

32. As MANAFORT knows from giving directions to Companies A and B, and from the discovery material provided herein, various employees of Companies A and B understood that they were receiving direction from MANAFORT and President Yanukovich, not the Centre, which was not even operational when Companies A and B began lobbying for Ukraine. MANAFORT, Gates, and employees of both Companies A and B referred to the client in ways that made clear they knew it was Ukraine, for instance noting that the “client” had an Embassy in Washington D.C. The head of Company B told his team to think the President of Ukraine “is the client.” As a Company A employee noted to another company employee: the lobbying for the

Centre was “in name only. [Y]ou’ve gotta see through the nonsense of that[.]” “It’s like Alice in Wonderland.” An employee of Company B described the Centre as a fig leaf, and the Centre’s written certification that it was not related to the Party of Regions as “a fig leaf on a fig leaf,” referring to the Centre in an email as the “European hot dog stand for a Modern Ukraine.”

Conspiring to Obstruct Justice: False and Misleading Submissions to the Department of Justice

33. In September 2016, after numerous press reports concerning MANAFORT had appeared in August, the Department of Justice National Security Division informed MANAFORT, Gates, and DMI in writing that it sought to determine whether they had acted as agents of a foreign principal under the Foreign Agents Registration Act, without registering. In November 2016 and February 2017, MANAFORT and Gates conspired to knowingly and intentionally cause false and misleading letters to be submitted to the Department of Justice, through his unwitting legal counsel. The letters, both of which were approved by MANAFORT before they were submitted by his counsel, represented falsely, among other things, that:

- a. DMI’s “efforts on behalf of the Party of Regions” “did not include meetings or outreach within the U.S.”;
- b. MANAFORT did not “recall meeting with or conducting outreach to U.S. government officials or U.S. media outlets on behalf of the [Centre], nor do they recall being party to, arranging, or facilitating any such communications. Rather, it is the recollection and understanding of Messrs. Gates and Manafort that such communications would have been facilitated and conducted by the [Centre’s] U.S. consultants, as directed by the [Centre]. . . .”;
- c. MANAFORT had merely served as a means of introduction of Company A and Company B to the Centre and provided the Centre with a list of “potential U.S.-based

consultants—including [Company A] and [Company B]—for the [Centre’s] reference and further consideration.”

d. DMI “does not retain communications beyond thirty days” and as a result of this policy, a “search has returned no responsive documents.” The November 2016 letter attached a one-page, undated document that purported to be a DMI “Email Retention Policy.”

34. In fact, MANAFORT had: selected Companies A and B; engaged in weekly scheduled calls and frequent emails with Companies A and B to provide them directions as to specific lobbying steps that should be taken; sought and received detailed oral and written reports from these firms on the lobbying work they had performed; communicated with Yanukovych to brief him on their lobbying efforts; both congratulated and reprimanded Companies A and B on their lobbying work; communicated directly with United States officials in connection with this work; and paid the lobbying firms over \$2.5 million from offshore accounts he controlled, among other things.

35. Although MANAFORT had represented to the Department of Justice in November 2016 and February 2017 that he had no relevant documents, in fact MANAFORT had numerous incriminating documents in his possession, as he knew at the time. The Federal Bureau of Investigation conducted a court-authorized search of MANAFORT’S home in Virginia in the summer of 2017. The documents attached hereto as Government Exhibits 503, 504, 517, 532, 594, 604, 606, 616, 691, 692, 697, 706 and 708, among numerous others, were all documents that MANAFORT had in his possession (and were found in the search) and all pre-dated the November 2016 letter.

#### **B. Money Laundering Conspiracy**

36. In or around and between 2006 and 2016, MANAFORT, together with others, did



knowingly and intentionally conspire (a) to conduct financial transactions, affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, to wit, felony violations of FARA in violation of Title 22, United States Code, Sections 612 and 618, knowing that the property involved in the financial transactions represented proceeds of some form of unlawful activity, with intent to engage in conduct constituting a violation of sections 7201 and 7206 of the Internal Revenue Code of 1986; and (b) to 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 specified unlawful activity, to wit: a felony violation of FARA, in violation of Title 22, United States Code, Sections 612 and 618, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(ii) and (a)(2)(A).

37. MANAFORT caused the following transfers to be made, knowing that they were being made to entities to carry on activities that were required to be timely reported under the Foreign Agents Registration Act, but were not:

Payee	Date	Payer	Originating Bank Account	Country of... Origin	Destination	Amount (USD)
Company A	8/2/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$270,000.00
	10/10/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$90,000.00
	11/16/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$120,000.00
	11/20/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$182,968.07
	12/21/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$25,000.00
	3/15/2013	Bletilla Ventures Ltd.	Hellenic Bank Account -2501	Cyprus	US	\$90,000.00
	9/18/2013	Global Endeavour Inc.	Loyal Bank Limited Account -1840	SVG*	US	\$135,937.37

Payee	Date	Payer	Originating Bank Account	Country of... Origin	Destination	Amount (USD)
	10/31/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$167,689.40
	3/28/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$135,639.65
	4/3/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$82,979.93
<b>Total Company A Transfers</b>						<b>\$1,300,214.42</b>
Company B	5/30/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$130,000.00
	8/2/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$195,000.00
	10/10/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$130,000.00
	11/16/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$50,000.00
	12/21/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$54,649.51
	3/15/2013	Bletilla Ventures Ltd.	Hellenic Bank Account -2501	Cyprus	US	\$150,000.00
	9/3/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$175,857.51
	10/31/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$195,857.51
	3/12/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$26,891.78
	3/21/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$138,026.00
	4/15/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$4,728.81
	4/25/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$4,739.23
<b>Total Company B Transfers</b>						<b>\$1,255,750.35</b>

Payee	Date	Payer	Originating Bank Account	Country of... Origin Destination		Amount (USD)
Law Firm A	4/19/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$2,000,000.00
	5/30/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$1,000,000.00
	7/13/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$1,000,000.00
<b>Total Law Firm A Transfers</b>						<b>\$4,000,000.00</b>
<b>TOTAL TRANSFERS</b>						<b>\$6,555,964.77</b>

\* SVG refers to St. Vincent and the Grenadines.

### C. Tax and Foreign Bank Account Conspiracy

26 U.S.C. § 7206(1)

31 U.S.C. §§ 5314 and 5322(a)

38. From 2008 through 2014, MANAFORT caused millions of dollars of wire transfers to be made from offshore nominee accounts, without paying taxes on that income. The payments were made for goods, services, and real estate. MANAFORT also hid income by denominating various overseas payments as “loans,” thereby evading payment of any taxes on that income by MANAFORT.

39. MANAFORT directly and through Gates repeatedly misled his bookkeeper and tax accountants, including by not disclosing Manafort’s overseas accounts and income. Further, MANAFORT and Gates, acting at Manafort’s instruction, classified overseas payments made to MANAFORT falsely as “loans” to avoid incurring additional taxes on the income.

40. MANAFORT owned and controlled a range of foreign bank accounts in Cyprus, the Grenadines, and the United Kingdom. MANAFORT directly and through Gates maintained these accounts, including by managing them and by making substantial transfers from the accounts to both himself and vendors for personal items for him and his family. MANAFORT was aware that many of these accounts held well in excess of \$10,000 in the aggregate at some point during each year in which they existed. MANAFORT did not report the accounts’ existence to his bookkeeper

and his tax preparers in an effort to hide them, and to allow him to avoid disclosing their existence on an FBAR filing.

41. MANAFORT was aware at the time that it was illegal to hide income from the Internal Revenue Service (IRS) by failing to account for reportable income on his income tax returns. MANAFORT was also aware that it was illegal to fail to report information to the IRS regarding the existence of foreign bank accounts, as required by Schedule B of the IRS Form 1040. MANAFORT also understood at the time that a U.S. person who had a financial interest in, or signature or other authority over, a bank account or other financial account in a foreign country, which exceeded \$10,000 in any one year (at any time during that year), was required to report the account to the Department of the Treasury. MANAFORT also understood, after 2010, that the failure to make such a report constituted a crime.

42. Knowing the existence of his reportable foreign accounts and hidden income, MANAFORT knowingly, intentionally, and willfully filed and conspired to file false tax returns from 2006-2015 in that he said he did not have reportable foreign bank accounts when he knew that he did, he did not report income that he knew he in fact had earned, and he did not file Foreign Bank Account Reports. MANAFORT failed to report over \$15 million in income during the period 2010-2014.

#### **FORFEITURE**

43. The following assets constitute or were derived from proceeds of MANAFORT's conspiracy to violate the Foreign Agents Registration Act and/or they constitute property involved in MANAFORT's conspiracy to launder money in violation of 18 U.S.C. § 1956 or are traceable thereto and/or they represent substitute assets for such property which has been made unavailable for forfeiture by the acts or omissions of MANAFORT:

- a) The real property and premises commonly known as 377 Union Street, Brooklyn, New

- York 11231 (Block 429, Lot 65), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
- b) The real property and premises commonly known as 29 Howard Street, #4D, New York, New York 10013 (Block 209, Lot 1104), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
  - c) The real property and premises commonly known as 174 Jobs Lane, Water Mill, New York 11976, including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
  - d) All funds held in account number XXXXXX0969 at The Federal Savings Bank, and any property traceable thereto;
  - e) All funds seized from account number XXXXXX1388 at Capital One N.A. and any property traceable thereto;
  - f) All funds seized from account number XXXXXX9952 at The Federal Savings Bank and any property traceable thereto;
  - g) Northwestern Mutual Universal Life Insurance Policy and any property traceable thereto;
  - h) The real property and premises commonly known as 123 Baxter Street, #5D, New York, New York 10016 in lieu of 1046 N. Edgewood Street; and
  - i) The real property and premises commonly known as 721 Fifth Avenue, #43G, New York, New York 10022 in lieu of all funds from account number at Charles Schwab & Co. Inc., and any property traceable thereto.

**Count Two: Witness Tampering Conspiracy (18 U.S.C. § 371)**

44. From in or about and between February 23, 2018, and April 2018, both dates being approximate and inclusive, within the District of Columbia and elsewhere, the defendant PAUL J.



MANAFORT, JR., together with others, including Konstantin Kilimnik, 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, in violation of 18 U.S.C. § 1512(b)(1). The facts set forth with respect to Count One are incorporated herein.

45. On February 22, 2018, MANAFORT was charged in the District of Columbia in a Superseding Indictment that for the first time included allegations about the Hapsburg Group and MANAFORT's use of that group to lobby illegally in the United States in violation of the Foreign Agent Registration Act. MANAFORT knew that the Act prescribed only United States lobbying. Immediately after February 22, 2018, MANAFORT began reaching out directly and indirectly to Persons D1 and D2 to induce them to say falsely that they did not work in the United States as part of the lobbying campaign, even though MANAFORT then and there well knew that they did lobby in the United States.

46. MANAFORT committed the following overt acts directly and through his conspirators.

Date/Time*	Sender	Receiver	Event
<i>MANAFORT contacted Person D1 by phone and a messaging application:</i>			
2/24/2018; 15:51 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
2/24/2018; 15:51 (UTC)	MANAFORT	Person D1	Phone call: 1 min, 24 second call.
2/24/2018; 15:53 (UTC)	MANAFORT	Person D1	Text: "This is paul"
2/25/2018; 18:41 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
2/26/2018; 23:56 (UTC)	MANAFORT	Person D1	Text: "http://www.businessinsider.com/former-european-leaders-manafort-hapsburg-group-2018-2?r=UK&IR=T"

Date/Time*	Sender	Receiver	Event
2/26/2018; 23:57 (UTC)	MANAFORT	Person D1	Text: "We should talk. I have made clear that they worked in Europe."
2/27/2018; 11:03 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
2/27/2018; 11:31 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
<i>Kilimnik contacted Person D2 a messaging application, sending four messages:</i>			
2/28/2018; 01:49 (CEST)	Kilimnik	Person D2	"[Person D2], hi! How are you? Hope you are doing fine. ;))"
2/28/2018; 01:51 (CEST)	Kilimnik	Person D2	"My friend P is trying to reach [Person D1] to brief him on what's going on."
2/28/2018; 01:51 (CEST)	Kilimnik	Person D2	"If you have a chance to mention this to [Person D1] - would be great"
2/28/2018; 01:53 (CEST)	Kilimnik	Person D2	"Basically P wants to give him a quick summary that he says to everybody (which is true) that our friends never lobbied in the US, and the purpose of the program was EU"
<i>Kilimnik contacted Person D2 using a different messaging application, sending five messages:</i>			
2/28/2018; 06:01 (CEST)	Kilimnik	Person D2	"Hey, how are you? This is K."
2/28/2018; 06:01(CEST)	Kilimnik	Person D2	"Hope you are doing fine."
2/28/2018; 06:01 (CEST)	Kilimnik	Person D2	"My friend P is trying to reach [Person D1] to brief him on what's going on"
2/28/2018; 06:02 (CEST)	Kilimnik	Person D2	"Basically P wants to give him a quick summary that he says to everybody (which is true) that our friends never lobbied in the US, and the purpose of the program was EU"

Date/Time*	Sender	Receiver	Event
2/28/2018; 06:03 (CEST)	Kilimnik	Person D2	"If you have a chance to mention this to [First Initial of Person D1's Name]. - it would be great. It would be good to get them connected to discuss in person. P is his friend."
<i>Kilimnik contacted Person D2 using two different applications, sending three messages:</i>			
4/4/2018; 08:53 (CEST)	Kilimnik	Person D2	"Hey. This is Konstantin. My friend P asked me again to help connect him with [Person D1]. Can you help?"
4/4/2018; 08:54 (CEST)	Kilimnik	Person D2	"Hey. My friend P has asked me again if there is any way to help connect him through [Person D1]"
4/4/2018; 08:54 (CEST)	Kilimnik	Person D2	"I tried him on all numbers."
<i>Kilimnik contacted Person D1 using a messaging application:</i>			
4/4/2018; 13:00 (UTC)	Kilimnik	Person D1	"Hi. This is K. My friend P is looking for ways to connect to you to pass you several messages. Can we arrange that."

\*UTC and CEST refer to Coordinated Universal Time and Central European Summer Time, respectively.

### Other Acts

#### I. **Bank/Bank Fraud Conspiracy** **18 U.S.C. §§ 1344 and 1349**

#### **Bank Fraud Conspiracy / Citizens Bank / \$3.4 million loan** **(Charged as Count 24 in the Eastern District of Virginia Superseding Indictment)**

47. Between December 2015 and March 2016, MANAFORT conspired to intentionally defraud Citizens Bank in connection with his application for a mortgage for approximately \$3.4 million. The mortgage related to a condominium on Howard Street in the Soho neighborhood of Manhattan, New York. During the course of the conspiracy, MANAFORT made and caused to be made, a series of false and fraudulent representations to the bank in order to secure the loan, including the

following: (a) MANAFORT falsely represented the amount of debt he had by failing to disclose on his loan application the existence of a mortgage on his Union Street property (from Genesis Capital); (b) MANAFORT caused an insurance broker to provide Citizens Bank false information, namely, an outdated insurance report that did not list the Union Street loan (from Genesis Capital); (c) MANAFORT falsely stated that a \$1.5 million Peranova loan had been forgiven in 2015; and (d) MANAFORT falsely represented to the lender and its agents that the Howard Street property was a secondary home used as such by his daughter and son-in-law and was not held as a rental property. These statements were material to Citizens Bank.

48. Citizens Bank was a financial institution chartered by the United States.

**Bank Fraud Conspiracy / Banc of California / \$1 million loan  
(Charged as Count 26 in the Eastern District of Virginia Superseding Indictment)**

49. In approximately February 2016, MANAFORT conspired to intentionally defraud Banc of California in connection with his application for a business loan. During the course of the conspiracy, MANAFORT made and caused to be made a series of false and fraudulent representations to the bank, including the following: (a) the submission of a false statement of assets and liabilities that failed to disclose a loan on the Union Street property (from Genesis Capital) and misrepresented, among other things, the amount of the mortgage on the Howard Street property; and (b) the submission of a doctored 2015 DMI profit and loss statement (P&L) that overstated DMI's 2015 income by more than \$4 million. These statements were material to Banc of California.

50. Banc of California was a financial institution chartered by the United States.

**Bank Fraud Conspiracy / Citizens Bank / \$5.5 million loan  
(Charged as Count 28 in the Eastern District of Virginia Superseding Indictment)**

51. Between December 2015 and March 2016, MANAFORT conspired to intentionally defraud Citizens Bank in connection with his application for a mortgage for approximately \$5.5 million on a property at Union Street in Brooklyn, New York. During the course of the conspiracy, MANAFORT made or caused to be made a series of false and fraudulent material representations to the bank in order to secure the loan, including the following: (a) the submission of a false statement of assets and liabilities that hid a prior loan on the Union Street property (from Genesis Capital), among other liabilities; and (b) the submission of a falsified 2016 DMI P&L that overstated DMI's income by more than \$2 million.

**Bank Fraud/Bank Fraud Conspiracy / The Federal Savings Bank / \$9.5 million loan & \$6.5 million loan  
(Charged in Counts 29, 30, 31 & 32 in the Eastern District of Virginia Superseding Indictment)**

52. Between April 2016 and January 2017, MANAFORT conspired to intentionally defraud, and did defraud, The Federal Savings Bank in connection with his applications for the following two loans: (a) a loan for approximately \$9.5 million related to various properties, including a house in Bridgehampton, New York, and (b) a loan for approximately \$6.5 million related to his Union Street property. During the course of the fraudulent scheme, MANAFORT made and caused to be made a series of false and fraudulent material representations to the bank in order to secure both loans, including the following: (a) MANAFORT provided the bank with doctored P&Ls for DMI for both 2015 and 2016, overstating its income by millions of dollars; and (b) MANAFORT falsely represented to The Federal Savings Bank that he had lent his credit card to a friend who had incurred more than \$200,000 in charges relating to the purchase of Yankee tickets.

53. Both loans were extended by The Federal Savings Bank.



54. The Federal Savings Bank was a financial institution chartered by the United States.

ROBERT S. MUELLER, III  
Special Counsel

By:



Andrew Weissmann  
Jeannie S. Rhee  
Greg D. Andres  
Kyle R. Freeny  
Senior/Assistant Special Counsels



DEFENDANT'S ACCEPTANCE

I have read every page of this Agreement and have discussed it with my attorneys Kevin Downing, Thomas Zehnle, and Richard Westling. I am fully satisfied with the legal representation by them, who I have chosen to represent me herein. Nothing about the quality of the representation of other counsel is affecting my decision herein to plead guilty. I fully understand this Agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Agreement fully. I am pleading guilty because I am in fact guilty of the offense identified in this Agreement.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in this Agreement. I am satisfied with the legal services provided by my attorneys in connection with this Agreement and matters related to it.


Date: 9-14-18

  
Paul J. Manafort, Jr.  
Defendant

ATTORNEYS' ACKNOWLEDGMENT

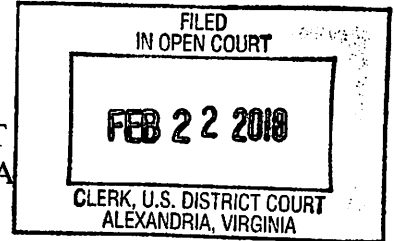
I have read every page of this Agreement, reviewed this Agreement with my client, Paul J. Manafort, and fully discussed the provisions of this Agreement with my client. These pages accurately and completely set forth the entire Agreement. I concur in my client's desire to plead guilty as set forth in this Agreement.

Date: 9-14-18

  
Kevin M. Downing  
Richard W. Westling  
Thomas E. Zehnle  
Attorneys for Defendant

# **ATTACHMENT C**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division



UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,  
(Counts 1 through 5, 11 through 14, and  
24 through 32)

and

RICHARD W. GATES III,  
(Counts 6 through 10 and 15 through 32)

Defendants.

\*  
\* CRIMINAL NO. 1:18 Cr. 83 (TSE)(S-1)  
\*

\* COUNTS 1-5: 26 U.S.C. § 7206(1); 18  
\* U.S.C. §§ 2 and 3551 et seq.  
\* Subscribing to False United States  
\* Individual Income Tax Returns  
\*

\* COUNTS 6-10: 26 U.S.C. § 7206(2); 18  
\* U.S.C. § 3551 et seq.  
\* Assisting in the Preparation of False  
\* United States Individual Income  
\*

\* COUNTS 11-14: 31 U.S.C. §§ 5314 and  
\* 5322(a); 18 U.S.C. §§ 2 and 3551 et seq.  
\* Failure To File Reports Of Foreign Bank  
\* And Financial Accounts  
\*

\* COUNTS 15-19: 26 U.S.C. § 7206(1);  
\* 18 U.S.C. §§ 2 and 3551 et seq.  
\* Subscribing to False United States  
\* Individual Income Tax Returns  
\*

\* COUNT 20: 26 U.S.C. § 7206(1); 18  
\* U.S.C. §§ 2 and 3551 et seq.  
\* Subscribing to a False Amended United  
\* States Individual Income Tax Return  
\*

\* COUNTS 21-23: 31 U.S.C. §§ 5314 and  
\* 5322(a); 18 U.S.C. §§ 2 and 3551 et seq.  
\* Failure To File Reports Of Foreign Bank  
\* And Financial Accounts  
\*

\* COUNT 24: 18 U.S.C. §§ 1349 and 3551  
\* et seq.  
\* Bank Fraud Conspiracy  
\*

\* COUNT 25: 18 U.S.C. §§ 1344, 2, and  
\* 3551 et seq.  
\* Bank Fraud

\* COUNT 26: 18 U.S.C. §§ 1349 and 3551  
\* et seq.  
\* Bank Fraud Conspiracy  
\*  
\* COUNTS 27: 18 U.S.C. §§ 1344, 2, and  
\* 3551 et seq.  
\* Bank Fraud  
\*  
\* COUNT 28–29: 18 U.S.C. §§ 1349 and  
\* 3551 et seq.  
\* Bank Fraud Conspiracy  
\*  
\* COUNT 30: 18 U.S.C. §§ 1344, 2, and  
\* 3551 et seq.  
\* Bank Fraud  
\*  
\* COUNT 31: 18 U.S.C. §§ 1349 and 3551  
\* et seq.  
\* Bank Fraud Conspiracy  
\*  
\* COUNT 32: 18 U.S.C. §§ 1344, 2, and  
\* 3551 et seq.  
\* Bank Fraud  
\*  
\* FORFEITURE NOTICE  
\*  
\*

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### **SUPERSEDING INDICTMENT**

February 2018 Term – At Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

#### **Introduction**

At all times relevant to this Superseding Indictment:

1. Defendants PAUL J. MANAFORT, JR. (MANAFORT) and RICHARD W. GATES III (GATES) served for years as political consultants and lobbyists. Between at least 2006 and 2015,



MANAFORT and GATES acted as unregistered agents of a foreign government and foreign political parties. Specifically, they represented the Government of Ukraine, the President of Ukraine (Victor Yanukovich, who was President from 2010 to 2014), the Party of Regions (a Ukrainian political party led by Yanukovich), and the Opposition Bloc (a successor to the Party of Regions after Yanukovich fled to Russia).

2. MANAFORT and GATES generated tens of millions of dollars in income as a result of their Ukraine work. From approximately 2006 through the present, MANAFORT and GATES engaged in a scheme to hide income from United States authorities, while enjoying the use of the money. During the first part of the scheme between approximately 2006 and 2015, MANAFORT, with GATES' assistance, failed to pay taxes on this income by disguising it as alleged "loans" from nominee offshore corporate entities and by making millions of dollars in unreported payments from foreign accounts to bank accounts they controlled and United States vendors. MANAFORT also used the offshore accounts to purchase United States real estate, and MANAFORT and GATES used the undisclosed income to make improvements to and refinance their United States properties.

3. In the second part of the scheme, between approximately 2015 and at least January 2017, when the Ukraine income dwindled after Yanukovich fled to Russia, MANAFORT, with the assistance of GATES, extracted money from MANAFORT's United States real estate by, among other things, using those properties as collateral to obtain loans from multiple financial institutions. MANAFORT and GATES fraudulently secured more than twenty million dollars in loans by falsely inflating MANAFORT's and his company's income and by failing to disclose existing debt in order to qualify for the loans.

4. In furtherance of the scheme, MANAFORT and GATES funneled millions of dollars in

payments into numerous foreign nominee companies and bank accounts, opened by them and their accomplices in nominee names and in various foreign countries, including Cyprus, Saint Vincent & the Grenadines (Grenadines), and the Seychelles. MANAFORT and GATES hid the existence and ownership of the foreign companies and bank accounts, falsely and repeatedly reporting to their tax preparers and to the United States that they had no foreign bank accounts.

5. In furtherance of the scheme, MANAFORT used his hidden overseas wealth to enjoy a lavish lifestyle in the United States, without paying taxes on that income. MANAFORT, without reporting the income to his tax preparer or the United States, spent millions of dollars on luxury goods and services for himself and his extended family through payments wired from offshore nominee accounts to United States vendors. MANAFORT also used these offshore accounts to purchase multi-million dollar properties in the United States and to improve substantially another property owned by his family.

6. In furtherance of the scheme, GATES used millions of dollars from these offshore accounts to pay for his personal expenses, including his mortgage, children's tuition, and interior decorating and refinancing of his Virginia residence.

7. In total, more than \$75,000,000 flowed through the offshore accounts. MANAFORT, with the assistance of GATES, laundered more than \$30,000,000, income that he concealed from the United States Department of the Treasury (Treasury), the Department of Justice, and others. GATES obtained more than \$3,000,000 from the offshore accounts, income that he too concealed from the Treasury, the Department of Justice, and others.

**Relevant Individuals And Entities**

8. MANAFORT was a United States citizen. He resided in homes in Virginia, Florida, and Long Island, New York.

9. GATES was a United States citizen. He resided in Virginia.

10. In 2005, MANAFORT and another partner created Davis Manafort Partners, Inc. (DMP) to engage principally in political consulting. DMP had staff in the United States, Ukraine, and Russia. In 2011, MANAFORT created DMP International, LLC (DMI) to engage in work for foreign clients, in particular political consulting, lobbying, and public relations for the Government of Ukraine, the Party of Regions, and members of the Party of Regions. DMI was a partnership solely owned by MANAFORT and his spouse. GATES worked for both DMP and DMI and served as MANAFORT's right-hand man.

11. The Party of Regions was a pro-Russia political party in Ukraine. Beginning in approximately 2006, it retained MANAFORT, through DMP and then DMI, to advance its interests in Ukraine, the United States, and elsewhere, including the election of its slate of candidates. In 2010, its candidate for President, Yanukovich, was elected President of Ukraine. In 2014, Yanukovich fled Ukraine for Russia in the wake of popular protests of widespread governmental corruption. Yanukovich, the Party of Regions, and the Government of Ukraine were MANAFORT, DMP, and DMI clients.

12. MANAFORT and GATES owned or controlled the following entities, which were used in the scheme (the MANAFORT-GATES entities):

**Domestic Entities**

<b>Entity Name</b>	<b>Date Created</b>	<b>Incorporation Location</b>
Bade LLC (RG)	January 2012	Delaware

Entity Name	Date Created	Incorporation Location
Daisy Manafort, LLC (PM)	August 2008	Virginia
	March 2011	Florida
Davis Manafort International LLC (PM)	March 2007	Delaware
DMP (PM)	March 2005	Virginia
	March 2011	Florida
Davis Manafort, Inc. (PM)	October 1999	Delaware
	November 1999	Virginia
DMI (PM)	June 2011	Delaware
	March 2012	Florida
Global Sites LLC (PM, RG)	July 2008	Delaware
Jemina LLC (RG)	July 2008	Delaware
Jesand Investment Corporation (PM)	April 2002	Virginia
Jesand Investments Corporation (PM)	March 2011	Florida
John Hannah, LLC (PM)	April 2006	Virginia
	March 2011	Florida
Jupiter Holdings Management, LLC (RG)	January 2011	Delaware
Lilred, LLC (PM)	December 2011	Florida
LOAV Ltd. (PM)	April 1992	Delaware
MC Brooklyn Holdings, LLC (PM)	November 2012	New York
MC Soho Holdings, LLC (PM)	January 2012	Florida
	April 2012	New York
Smythson LLC (also known as Symthson LLC) (PM, RG)	July 2008	Delaware

Cypriot Entities

<b>Entity Name</b>	<b>Date Created</b>	<b>Incorporation Location</b>
Actinet Trading Limited (PM, RG)	May 2009	Cyprus
Black Sea View Limited (PM, RG)	August 2007	Cyprus
Bletilla Ventures Limited (PM, RG)	October 2010	Cyprus
Cavenari Investments Limited (RG)	December 2007	Cyprus
Global Highway Limited (PM, RG)	August 2007	Cyprus
Leviathan Advisors Limited (PM, RG)	August 2007	Cyprus
LOAV Advisors Limited (PM, RG)	August 2007	Cyprus
Lucicle Consultants Limited (PM, RG)	December 2008	Cyprus
Marziola Holdings Limited (PM)	March 2012	Cyprus
Olivenia Trading Limited (PM, RG)	March 2012	Cyprus
Peranova Holdings Limited (Peranova) (PM, RG)	June 2007	Cyprus
Serangon Holdings Limited (PM, RG)	January 2008	Cyprus
Yiakora Ventures Limited (PM)	February 2008	Cyprus

Other Foreign Entities

<b>Entity Name</b>	<b>Date Created</b>	<b>Incorporation Location</b>
Global Endeavour Inc. (also known as Global Endeavor Inc.) (PM)	<i>Unknown</i>	Grenadines
Jeunet Ltd. (PM)	August 2011	Grenadines
Pompolo Limited (PM, RG)	April 2013	United Kingdom



13. The Internal Revenue Service (IRS) was a bureau in the Treasury responsible for administering the tax laws of the United States and collecting taxes owed to the Treasury.

### The Tax Scheme

#### MANAFORT And GATES' Wiring Money From Offshore Accounts Into The United States

14. In order to use the money in the offshore nominee accounts of the MANAFORT–GATES entities without paying taxes on it, MANAFORT and GATES caused millions of dollars in wire transfers from these accounts to be made for goods, services, and real estate. They did not report these transfers as income.

15. From 2008 to 2014, MANAFORT caused the following wires, totaling over \$12,000,000, to be sent to the vendors listed below for personal items. MANAFORT did not pay taxes on this income, which was used to make the purchases.

Payee	Transaction Date	Originating Account Holder	Country of Origination	Amount of Transaction
Vendor A (Home Improvement Company in the Hamptons, New York)	6/10/2008	LOAV Advisors Limited	Cyprus	\$107,000
	6/25/2008	LOAV Advisors Limited	Cyprus	\$23,500
	7/7/2008	LOAV Advisors Limited	Cyprus	\$20,000
	8/5/2008	Yiakora Ventures Limited	Cyprus	\$59,000
	9/2/2008	Yiakora Ventures Limited	Cyprus	\$272,000
	10/6/2008	Yiakora Ventures Limited	Cyprus	\$109,000
	10/24/2008	Yiakora Ventures Limited	Cyprus	\$107,800
	11/20/2008	Yiakora Ventures Limited	Cyprus	\$77,400
	12/22/2008	Yiakora Ventures Limited	Cyprus	\$100,000
	1/14/2009	Yiakora Ventures Limited	Cyprus	\$9,250
	1/29/2009	Yiakora Ventures Limited	Cyprus	\$97,670
	2/25/2009	Yiakora Ventures Limited	Cyprus	\$108,100
	4/16/2009	Yiakora Ventures Limited	Cyprus	\$94,394
	5/7/2009	Yiakora Ventures Limited	Cyprus	\$54,000
	5/12/2009	Yiakora Ventures Limited	Cyprus	\$9,550
	6/1/2009	Yiakora Ventures Limited	Cyprus	\$86,650
	6/18/2009	Yiakora Ventures Limited	Cyprus	\$34,400
	7/31/2009	Yiakora Ventures Limited	Cyprus	\$106,000

<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
	8/28/2009	Yiakora Ventures Limited	Cyprus	\$37,000
	9/23/2009	Yiakora Ventures Limited	Cyprus	\$203,500
	10/26/2009	Yiakora Ventures Limited	Cyprus	\$38,800
	11/18/2009	Global Highway Limited	Cyprus	\$130,906
	3/8/2010	Global Highway Limited	Cyprus	\$124,000
	5/11/2010	Global Highway Limited	Cyprus	\$25,000
	7/8/2010	Global Highway Limited	Cyprus	\$28,000
	7/23/2010	Leviathan Advisors Limited	Cyprus	\$26,500
	8/12/2010	Leviathan Advisors Limited	Cyprus	\$138,900
	9/2/2010	Yiakora Ventures Limited	Cyprus	\$31,500
	10/6/2010	Global Highway Limited	Cyprus	\$67,600
	10/14/2010	Yiakora Ventures Limited	Cyprus	\$107,600
	10/18/2010	Leviathan Advisors Limited	Cyprus	\$31,500
	12/16/2010	Global Highway Limited	Cyprus	\$46,160
	2/7/2011	Global Highway Limited	Cyprus	\$36,500
	3/22/2011	Leviathan Advisors Limited	Cyprus	\$26,800
	4/4/2011	Leviathan Advisors Limited	Cyprus	\$195,000
	5/3/2011	Global Highway Limited	Cyprus	\$95,000
	5/16/2011	Leviathan Advisors Limited	Cyprus	\$6,500
	5/31/2011	Leviathan Advisors Limited	Cyprus	\$70,000
	6/27/2011	Leviathan Advisors Limited	Cyprus	\$39,900
	7/27/2011	Leviathan Advisors Limited	Cyprus	\$95,000
	10/24/2011	Global Highway Limited	Cyprus	\$22,000
	10/25/2011	Global Highway Limited	Cyprus	\$9,300
	11/15/2011	Global Highway Limited	Cyprus	\$74,000
	11/23/2011	Global Highway Limited	Cyprus	\$22,300
	11/29/2011	Global Highway Limited	Cyprus	\$6,100
	12/12/2011	Leviathan Advisors Limited	Cyprus	\$17,800
	1/17/2012	Global Highway Limited	Cyprus	\$29,800
	1/20/2012	Global Highway Limited	Cyprus	\$42,600
	2/9/2012	Global Highway Limited	Cyprus	\$22,300
	2/23/2012	Global Highway Limited	Cyprus	\$75,000
	2/28/2012	Global Highway Limited	Cyprus	\$22,300
	3/28/2012	Peranova	Cyprus	\$37,500
	4/18/2012	Lucicle Consultants Limited	Cyprus	\$50,000
	5/15/2012	Lucicle Consultants Limited	Cyprus	\$79,000
	6/5/2012	Lucicle Consultants Limited	Cyprus	\$45,000
	6/19/2012	Lucicle Consultants Limited	Cyprus	\$11,860

Payee	Transaction Date	Originating Account Holder	Country of Origination	Amount of Transaction
	7/9/2012	Lucicle Consultants Limited	Cyprus	\$10,800
	7/18/2012	Lucicle Consultants Limited	Cyprus	\$88,000
	8/7/2012	Lucicle Consultants Limited	Cyprus	\$48,800
	9/27/2012	Lucicle Consultants Limited	Cyprus	\$100,000
	11/20/2012	Lucicle Consultants Limited	Cyprus	\$298,000
	12/20/2012	Lucicle Consultants Limited	Cyprus	\$55,000
	1/29/2013	Lucicle Consultants Limited	Cyprus	\$149,000
	3/12/2013	Lucicle Consultants Limited	Cyprus	\$375,000
	8/29/2013	Global Endeavour Inc.	Grenadines	\$200,000
	11/13/2013	Global Endeavour Inc.	Grenadines	\$75,000
	11/26/2013	Global Endeavour Inc.	Grenadines	\$80,000
	12/6/2013	Global Endeavour Inc.	Grenadines	\$130,000
	12/12/2013	Global Endeavour Inc.	Grenadines	\$90,000
	4/22/2014	Global Endeavour Inc.	Grenadines	\$56,293
	8/18/2014	Global Endeavour Inc.	Grenadines	\$34,660
<b>Vendor A Total</b>				<b>\$5,434,793</b>
<b>Vendor B</b> (Home Automation, Lighting and Home Entertainment Company in Florida)	3/22/2011	Leviathan Advisors Limited	Cyprus	\$12,000
	3/28/2011	Leviathan Advisors Limited	Cyprus	\$25,000
	4/27/2011	Leviathan Advisors Limited	Cyprus	\$12,000
	5/16/2011	Leviathan Advisors Limited	Cyprus	\$25,000
	11/15/2011	Global Highway Limited	Cyprus	\$17,006
	11/23/2011	Global Highway Limited	Cyprus	\$11,000
	2/28/2012	Global Highway Limited	Cyprus	\$6,200
	10/31/2012	Lucicle Consultants Limited	Cyprus	\$290,000
	12/17/2012	Lucicle Consultants Limited	Cyprus	\$160,600
	1/15/2013	Lucicle Consultants Limited	Cyprus	\$194,000
	1/24/2013	Lucicle Consultants Limited	Cyprus	\$6,300
	2/12/2013	Lucicle Consultants Limited	Cyprus	\$51,600
	2/26/2013	Lucicle Consultants Limited	Cyprus	\$260,000
	7/15/2013	Pompolo Limited	United Kingdom	\$175,575
	11/5/2013	Global Endeavour Inc.	Grenadines	\$73,000
<b>Vendor B Total</b>				<b>\$1,319,281</b>
<b>Vendor C</b> (Antique Rug Store in Alexandria, Virginia)	10/7/2008	Yiakora Ventures Limited	Cyprus	\$15,750
	3/17/2009	Yiakora Ventures Limited	Cyprus	\$46,200
	4/16/2009	Yiakora Ventures Limited	Cyprus	\$7,400
	4/27/2009	Yiakora Ventures Limited	Cyprus	\$65,000
	5/7/2009	Yiakora Ventures Limited	Cyprus	\$210,000

<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
	7/15/2009	Yiakora Ventures Limited	Cyprus	\$200,000
	3/31/2010	Yiakora Ventures Limited	Cyprus	\$140,000
	6/16/2010	Global Highway Limited	Cyprus	\$250,000
<b>Vendor C Total</b>				<b>\$934,350</b>
<b>Vendor D</b> (Related to Vendor C)	2/28/2012	Global Highway Limited	Cyprus	\$100,000
<b>Vendor D Total</b>				<b>\$100,000</b>
<b>Vendor E</b> (Men's Clothing Store in New York)	11/7/2008	Yiakora Ventures Limited	Cyprus	\$32,000
	2/5/2009	Yiakora Ventures Limited	Cyprus	\$22,750
	4/27/2009	Yiakora Ventures Limited	Cyprus	\$13,500
	10/26/2009	Yiakora Ventures Limited	Cyprus	\$32,500
	3/30/2010	Yiakora Ventures Limited	Cyprus	\$15,000
	5/11/2010	Global Highway Limited	Cyprus	\$39,000
	6/28/2010	Leviathan Advisors Limited	Cyprus	\$5,000
	8/12/2010	Leviathan Advisors Limited	Cyprus	\$32,500
	11/17/2010	Global Highway Limited	Cyprus	\$11,500
	2/7/2011	Global Highway Limited	Cyprus	\$24,000
	3/22/2011	Leviathan Advisors Limited	Cyprus	\$43,600
	3/28/2011	Leviathan Advisors Limited	Cyprus	\$12,000
	4/27/2011	Leviathan Advisors Limited	Cyprus	\$3,000
	6/30/2011	Global Highway Limited	Cyprus	\$24,500
	9/26/2011	Leviathan Advisors Limited	Cyprus	\$12,000
	11/2/2011	Global Highway Limited	Cyprus	\$26,700
	12/12/2011	Leviathan Advisors Limited	Cyprus	\$46,000
	2/9/2012	Global Highway Limited	Cyprus	\$2,800
	2/28/2012	Global Highway Limited	Cyprus	\$16,000
	3/14/2012	Lucicle Consultants Limited	Cyprus	\$8,000
	4/18/2012	Lucicle Consultants Limited	Cyprus	\$48,550
	5/15/2012	Lucicle Consultants Limited	Cyprus	\$7,000
	6/19/2012	Lucicle Consultants Limited	Cyprus	\$21,600
	8/7/2012	Lucicle Consultants Limited	Cyprus	\$15,500
	11/20/2012	Lucicle Consultants Limited	Cyprus	\$10,900
	12/20/2012	Lucicle Consultants Limited	Cyprus	\$7,500
	1/15/2013	Lucicle Consultants Limited	Cyprus	\$37,000
	2/12/2013	Lucicle Consultants Limited	Cyprus	\$7,000
	2/26/2013	Lucicle Consultants Limited	Cyprus	\$39,000
	9/3/2013	Global Endeavour Inc.	Grenadines	\$81,500

Payee	Transaction Date	Originating Account Holder	Country of Origination	Amount of Transaction
	10/15/2013	Global Endeavour Inc.	Grenadines	\$53,000
	11/26/2013	Global Endeavour Inc.	Grenadines	\$13,200
	4/24/2014	Global Endeavour Inc.	Grenadines	\$26,680
	9/11/2014	Global Endeavour Inc.	Grenadines	\$58,435
<b>Vendor E Total</b>				<b>\$849,215</b>
<b>Vendor F</b> (Landscape in the Hamptons, New York)	4/27/2009	Yiakora Ventures Limited	Cyprus	\$34,000
	5/12/2009	Yiakora Ventures Limited	Cyprus	\$45,700
	6/1/2009	Yiakora Ventures Limited	Cyprus	\$21,500
	6/18/2009	Yiakora Ventures Limited	Cyprus	\$29,000
	9/21/2009	Yiakora Ventures Limited	Cyprus	\$21,800
	5/11/2010	Global Highway Limited	Cyprus	\$44,000
	6/28/2010	Leviathan Advisors Limited	Cyprus	\$50,000
	7/23/2010	Leviathan Advisors Limited	Cyprus	\$19,000
	9/2/2010	Yiakora Ventures Limited	Cyprus	\$21,000
	10/6/2010	Global Highway Limited	Cyprus	\$57,700
	10/18/2010	Leviathan Advisors Limited	Cyprus	\$26,000
	12/16/2010	Global Highway Limited	Cyprus	\$20,000
	3/22/2011	Leviathan Advisors Limited	Cyprus	\$50,000
	5/3/2011	Global Highway Limited	Cyprus	\$40,000
	6/1/2011	Leviathan Advisors Limited	Cyprus	\$44,000
	7/27/2011	Leviathan Advisors Limited	Cyprus	\$27,000
	8/16/2011	Leviathan Advisors Limited	Cyprus	\$13,450
	9/19/2011	Leviathan Advisors Limited	Cyprus	\$12,000
	10/24/2011	Global Highway Limited	Cyprus	\$42,000
	11/2/2011	Global Highway Limited	Cyprus	\$37,350
<b>Vendor F Total</b>				<b>\$655,500</b>
<b>Vendor G</b> (Antique Dealer in New York)	9/2/2010	Yiakora Ventures Limited	Cyprus	\$165,000
	10/18/2010	Leviathan Advisors Limited	Cyprus	\$165,000
	2/28/2012	Global Highway Limited	Cyprus	\$190,600
	3/14/2012	Lucicle Consultants Limited	Cyprus	\$75,000
	2/26/2013	Lucicle Consultants Limited	Cyprus	\$28,310
<b>Vendor G Total</b>				<b>\$623,910</b>
<b>Vendor H</b> (Clothing Store in Beverly Hills, California)	6/25/2008	LOAV Advisors Limited	Cyprus	\$52,000
	12/16/2008	Yiakora Ventures Limited	Cyprus	\$49,000
	12/22/2008	Yiakora Ventures Limited	Cyprus	\$10,260
	8/12/2009	Yiakora Ventures Limited	Cyprus	\$76,400
	5/11/2010	Global Highway Limited	Cyprus	\$85,000
	11/17/2010	Global Highway Limited	Cyprus	\$128,280



<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
	5/31/2011	Leviathan Advisors Limited	Cyprus	\$64,000
	11/15/2011	Global Highway Limited	Cyprus	\$48,000
	12/17/2012	Lucicle Consultants Limited	Cyprus	\$7,500
<b>Vendor H Total</b>				<b>\$520,440</b>
<b>Vendor I</b> (Investment Company)	9/3/2013	Global Endeavour Inc.	Grenadines	\$500,000
<b>Vendor I Total</b>				<b>\$500,000</b>
<b>Vendor J</b> (Contractor in Florida)	11/15/2011	Global Highway Limited	Cyprus	\$8,000
	12/5/2011	Leviathan Advisors Limited	Cyprus	\$11,237
	12/21/2011	Black Sea View Limited	Cyprus	\$20,000
	2/9/2012	Global Highway Limited	Cyprus	\$51,000
	5/17/2012	Lucicle Consultants Limited	Cyprus	\$68,000
	6/19/2012	Lucicle Consultants Limited	Cyprus	\$60,000
	7/18/2012	Lucicle Consultants Limited	Cyprus	\$32,250
	9/19/2012	Lucicle Consultants Limited	Cyprus	\$112,000
	11/30/2012	Lucicle Consultants Limited	Cyprus	\$39,700
	1/9/2013	Lucicle Consultants Limited	Cyprus	\$25,600
	2/28/2013	Lucicle Consultants Limited	Cyprus	\$4,700
<b>Vendor J Total</b>				<b>\$432,487</b>
<b>Vendor K</b> (Landscape in the Hamptons, New York)	12/5/2011	Leviathan Advisors Limited	Cyprus	\$4,115
	3/1/2012	Global Highway Limited	Cyprus	\$50,000
	6/6/2012	Lucicle Consultants Limited	Cyprus	\$47,800
	6/25/2012	Lucicle Consultants Limited	Cyprus	\$17,900
	6/27/2012	Lucicle Consultants Limited	Cyprus	\$18,900
	2/12/2013	Lucicle Consultants Limited	Cyprus	\$3,300
	7/15/2013	Pompolo Limited	United Kingdom	\$13,325
	11/26/2013	Global Endeavour Inc.	Grenadines	\$9,400
<b>Vendor K Total</b>				<b>\$164,740</b>
<b>Vendor L</b> (Payments Relating to Three Range Rovers)	4/12/2012	Lucicle Consultants Limited	Cyprus	\$83,525
	5/2/2012	Lucicle Consultants Limited	Cyprus	\$12,525
	6/29/2012	Lucicle Consultants Limited	Cyprus	\$67,655
<b>Vendor L Total</b>				<b>\$163,705</b>
<b>Vendor M</b>	11/20/2012	Lucicle Consultants Limited	Cyprus	\$45,000
	12/7/2012	Lucicle Consultants Limited	Cyprus	\$21,000

<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
(Contractor in Virginia)	12/17/2012	Lucicle Consultants Limited	Cyprus	\$21,000
	1/17/2013	Lucicle Consultants Limited	Cyprus	\$18,750
	1/29/2013	Lucicle Consultants Limited	Cyprus	\$9,400
	2/12/2013	Lucicle Consultants Limited	Cyprus	\$10,500
<b>Vendor M Total</b>				<b>\$125,650</b>
<b>Vendor N</b> (Audio, Video, and Control System Home Integration and Installation Company in the Hamptons, New York)	1/29/2009	Yiakora Ventures Limited	Cyprus	\$10,000
	3/17/2009	Yiakora Ventures Limited	Cyprus	\$21,725
	4/16/2009	Yiakora Ventures Limited	Cyprus	\$24,650
	12/2/2009	Global Highway Limited	Cyprus	\$10,000
	3/8/2010	Global Highway Limited	Cyprus	\$20,300
	4/23/2010	Yiakora Ventures Limited	Cyprus	\$8,500
	7/29/2010	Leviathan Advisors Limited	Cyprus	\$17,650
<b>Vendor N Total</b>				<b>\$112,825</b>
<b>Vendor O</b> (Purchase of Mercedes Benz)	10/5/2012	Lucicle Consultants Limited	Cyprus	\$62,750
<b>Vendor O Total</b>				<b>\$62,750</b>
<b>Vendor P</b> (Purchase of Range Rover)	12/30/2008	Yiakora Ventures Limited	Cyprus	\$47,000
<b>Vendor P Total</b>				<b>\$47,000</b>
<b>Vendor Q</b> (Property Management Company in South Carolina)	9/2/2010	Yiakora Ventures Limited	Cyprus	\$10,000
	10/6/2010	Global Highway Limited	Cyprus	\$10,000
	10/18/2010	Leviathan Advisors Limited	Cyprus	\$10,000
	2/8/2011	Global Highway Limited	Cyprus	\$13,500
	2/9/2012	Global Highway Limited	Cyprus	\$2,500
<b>Vendor Q Total</b>				<b>\$46,000</b>
<b>Vendor R</b> (Art Gallery in Florida)	2/9/2011	Global Highway Limited	Cyprus	\$17,900
	2/14/2013	Lucicle Consultants Limited	Cyprus	\$14,000
<b>Vendor R Total</b>				<b>\$31,900</b>
<b>Vendor S</b>	9/26/2011	Leviathan Advisors Limited	Cyprus	\$5,000
	9/19/2012	Lucicle Consultants Limited	Cyprus	\$5,000

<b>Payee</b>	<b>Transaction Date</b>	<b>Originating Account Holder</b>	<b>Country of Origination</b>	<b>Amount of Transaction</b>
(Housekeeping in New York)	10/9/2013	Global Endeavour Inc.	Grenadines	\$10,000
<b>Vendor S Total</b>				<b>\$20,000</b>

16. In 2012, MANAFORT caused the following wires to be sent to the entities listed below to purchase the real estate also listed below. MANAFORT did not report the money used to make these purchases on his 2012 tax return.

<b>Property Purchased</b>	<b>Payee</b>	<b>Date</b>	<b>Originating Account</b>	<b>Country of Origin</b>	<b>Amount</b>
Howard Street Condominium (New York)	DMP International LLC	2/1/2012	Peranova	Cyprus	\$1,500,000
Union Street Brownstone, (New York)	Attorney Account Of [Real Estate Attorney]	11/29/2012	Actinet Trading Limited	Cyprus	\$1,800,000
		11/29/2012	Actinet Trading Limited	Cyprus	\$1,200,000
Arlington House (Virginia)	Real Estate Trust	8/31/2012	Lucicle Consultants Limited	Cyprus	\$1,900,000
<b>Total</b>					<b>\$6,400,000</b>

17. MANAFORT and GATES also disguised, as purported “loans,” more than \$10 million transferred from Cypriot entities, including the overseas MANAFORT–GATES entities, to domestic entities owned by MANAFORT. For example, a \$1.5 million wire from Peranova to DMI that MANAFORT used to purchase real estate on Howard Street in Manhattan, New York, was recorded as a “loan” from Peranova to DMI, rather than as income. The following loans were shams designed to reduce fraudulently MANAFORT’s reported taxable income.

Year	Payor / Ostensible "Lender"	Payee / Ostensible "Borrower"	Country of Origin	Total Amount of "Loans"
2008	Yiakora Ventures Limited	Jesand Investment Corporation	Cyprus	\$8,120,000
2008	Yiakora Ventures Limited	DMP	Cyprus	\$500,000
2009	Yiakora Ventures Limited	DMP	Cyprus	\$694,000
2009	Yiakora Ventures Limited	Daisy Manafort, LLC	Cyprus	\$500,000
2012	Peranova	DMI	Cyprus	\$1,500,000
2014	Telmar Investments Ltd.	DMI	Cyprus	\$900,000
2015	Telmar Investments Ltd.	DMI	Cyprus	\$1,000,000
<b>Total</b>				<b>\$13,214,000</b>

18. From 2010 to 2014, GATES caused the following wires, totaling more than \$3,000,000, to be sent to entities and bank accounts of which he was a beneficial owner or he otherwise controlled. GATES did not report this income on his tax returns.

Payee	Transaction Date	Originating Account Holder	Country of Origination	Amount of Transaction
Richard Gates United Kingdom Bank Account A	3/26/2010	Serangon Holdings Limited	Cyprus	\$85,000
	4/20/2010	Serangon Holdings Limited	Cyprus	\$50,000
	5/6/2010	Serangon Holdings Limited	Cyprus	\$150,000
Richard Gates United Kingdom Bank Account B	9/7/2010	Serangon Holdings Limited	Cyprus	\$160,000
	10/13/2010	Serangon Holdings Limited	Cyprus	\$15,000
Richard Gates United States Bank Account C	9/27/2010	Global Highway Limited	Cyprus	\$50,000
<b>2010 Tax Year Total</b>				<b>\$510,000</b>
Jemina LLC United States Bank Account D	9/9/2011	Peranova	Cyprus	\$48,500
Richard Gates United Kingdom Bank Account B	12/16/2011	Peranova	Cyprus	\$100,435
<b>2011 Tax Year Total</b>				<b>\$148,935</b>
Richard Gates United Kingdom Bank Account B	1/9/2012	Global Highway Limited	Cyprus	\$100,000
	1/13/2012	Peranova	Cyprus	\$100,435
	2/29/2012	Global Highway Limited	Cyprus	\$28,500
	3/27/2012	Bletilla Ventures Limited	Cyprus	\$18,745

Payee	Transaction Date	Originating Account Holder	Country of Origination	Amount of Transaction
	4/26/2012	Bletilla Ventures Limited	Cyprus	\$26,455
	5/30/2012	Bletilla Ventures Limited	Cyprus	\$15,000
	5/30/2012	Lucicle Consultants Limited	Cyprus	\$14,650
	6/27/2012	Bletilla Ventures Limited	Cyprus	\$18,745
	8/2/2012	Bletilla Ventures Limited	Cyprus	\$28,745
	8/30/2012	Bletilla Ventures Limited	Cyprus	\$38,745
	9/27/2012	Bletilla Ventures Limited	Cyprus	\$32,345
	10/31/2012	Bletilla Ventures Limited	Cyprus	\$46,332
	11/20/2012	Bletilla Ventures Limited	Cyprus	\$48,547
	11/30/2012	Bletilla Ventures Limited	Cyprus	\$38,532
	12/21/2012	Bletilla Ventures Limited	Cyprus	\$47,836
	12/28/2012	Bletilla Ventures Limited	Cyprus	\$47,836
<b>2012 Tax Year Total</b>				<b>\$651,448</b>
Richard Gates United Kingdom Bank Account B	1/11/2013	Bletilla Ventures Limited	Cyprus	\$47,836
	1/22/2013	Bletilla Ventures Limited	Cyprus	\$34,783
	1/30/2013	Bletilla Ventures Limited	Cyprus	\$46,583
	2/22/2013	Bletilla Ventures Limited	Cyprus	\$46,233
	2/28/2013	Bletilla Ventures Limited	Cyprus	\$46,583
	3/1/2013	Bletilla Ventures Limited	Cyprus	\$42,433
	3/15/2013	Bletilla Ventures Limited	Cyprus	\$37,834
	4/15/2013	Bletilla Ventures Limited	Cyprus	\$59,735
	4/26/2013	Bletilla Ventures Limited	Cyprus	\$48,802
	5/17/2013	Olivenia Trading Limited	Cyprus	\$57,798
	5/30/2013	Actinet Trading Limited	Cyprus	\$45,622
	6/13/2013	Lucicle Consultants Limited	Cyprus	\$76,343
	8/7/2013	Pompolo Limited	United Kingdom	\$250,784
	9/6/2013	Lucicle Consultants Limited	Cyprus	\$68,500
	9/13/2013	Cypriot Agent	Cyprus	\$179,216
Jemina LLC United States Bank Account D	7/8/2013	Marziola Holdings Limited	Cyprus	\$72,500
	9/4/2013	Marziola Holdings Limited	Cyprus	\$89,807
	10/22/2013	Cypriot Agent	Cyprus	\$119,844
	11/12/2013	Cypriot Agent	Cyprus	\$80,000
	12/20/2013	Cypriot Agent	Cyprus	\$90,000
<b>2013 Tax Year Total</b>				<b>\$1,541,237</b>
Jemina LLC United States Bank Account D	2/10/2014	Cypriot Agent	Cyprus	\$60,044
	4/29/2014	Cypriot Agent	Cyprus	\$44,068
	10/6/2014	Global Endeavour Inc.	Grenadines	\$65,000

Payee	Transaction Date	Originating Account Holder	Country of Origination	Amount of Transaction
Bade LLC United States Bank Account E	11/25/2014	Global Endeavour Inc.	Grenadines	\$120,000
<b>2014 Tax Year Total</b>				<b>\$289,112</b>

### MANAFORT And GATES' Hiding Foreign Bank Accounts And False Filings

19. United States citizens who have authority over certain foreign bank accounts—whether or not the accounts are set up in the names of nominees who act for their principals—have reporting obligations to the United States.

20. First, the Bank Secrecy Act and its implementing regulations require United States citizens to report to the Treasury any financial interest in, or signatory authority over, any bank account or other financial account held in foreign countries, for every calendar year in which the aggregate balance of all such foreign accounts exceeds \$10,000 at any point during the year. This is commonly known as a foreign bank account report or “FBAR.” The Bank Secrecy Act requires these reports because they have a high degree of usefulness in criminal, tax, or regulatory investigations or proceedings. The Treasury’s Financial Crimes Enforcement Network (FinCEN) is the custodian for FBAR filings, and FinCEN provides access to its FBAR database to law enforcement entities, including the Federal Bureau of Investigation. The reports filed by individuals and businesses are used by law enforcement to identify, detect, and deter money laundering that furthers criminal enterprise activity, tax evasion, and other unlawful activities.

21. Second, United States citizens also are obligated to report information to the IRS regarding foreign bank accounts. For instance, in 2010, Schedule B of IRS Form 1040 had a “Yes” or “No” box to record an answer to the question: “At any time during [the calendar year], did you have an interest in or a signature or other authority over a financial account in a foreign country, such as a



bank account, securities account, or other financial account?” If the answer was “Yes,” then the form required the taxpayer to enter the name of the foreign country in which the financial account was located.

22. For each year in or about and between 2008 through at least 2014, MANAFORT had authority over foreign accounts that required an FBAR filing. Specifically, MANAFORT was required to report to the Treasury each foreign bank account held by the foreign MANAFORT–GATES entities noted above in paragraph 12 that bears the initials PM. No FBAR filings were made by MANAFORT for these accounts.

23. For each year in or about and between 2010 through at least 2013, GATES had authority over foreign accounts that required an FBAR filing. Specifically, GATES was required to report to the United States Treasury each foreign bank account held by the foreign MANAFORT–GATES entities noted above in paragraph 12 that bears the initials RG, as well as United Kingdom Bank Accounts A and B noted in paragraph 18. No FBAR filings were made by GATES for these accounts.

24. Furthermore, in each of MANAFORT’s tax filings for 2008 through 2014, MANAFORT, with the assistance of GATES, represented falsely that he did not have authority over any foreign bank accounts. MANAFORT and GATES had repeatedly and falsely represented in writing to MANAFORT’s tax preparer that MANAFORT had no authority over foreign bank accounts, knowing that such false representations would result in false tax filings in MANAFORT’s name. For instance, on October 4, 2011, MANAFORT’s tax preparer asked MANAFORT in writing: “At any time during 2010, did you [or your wife or children] have an interest in or a signature or other authority over a financial account in a foreign country, such as a bank account, securities account or other financial account?” On the same day, MANAFORT falsely responded “NO.”

MANAFORT responded the same way as recently as October 3, 2016, when MANAFORT's tax preparer again emailed the question in connection with the preparation of MANAFORT's tax returns: "Foreign bank accounts etc.?" MANAFORT responded on or about the same day: "NONE."

25. In each of GATES' tax filings for 2010 through 2013, GATES represented falsely that he did not have authority over any foreign bank accounts. GATES had repeatedly and falsely represented to his tax preparers that he had no authority over foreign bank accounts, knowing that such false representations would result in false tax filings. As recently as October 2017, in preparation for his amended 2013 tax filing, GATES was asked by his tax preparer: "Did you have any foreign assets/bank accounts during 2013 or 2014?" to which he responded "no."

### **The Financial Institution Scheme**

26. Between in or around 2015 and the present, both dates being approximate and inclusive, in the Eastern District of Virginia and elsewhere, MANAFORT, GATES, and others devised and intended to devise, and executed and attempted to execute, a scheme and artifice to defraud, and to obtain money and property, by means of false and fraudulent pretenses, representations, and promises, from banks and other financial institutions. As part of the scheme, MANAFORT and GATES repeatedly provided and caused to be provided false information to banks and other lenders, among others.

### **MANAFORT And GATES' Fraud To Access Offshore Money**

27. When they were flush with Ukraine funds, MANAFORT, with the assistance of GATES, used their offshore accounts to purchase and improve real estate in the United States. When the income from Ukraine dwindled in 2014 and 2015, MANAFORT, with the assistance of GATES, obtained millions of dollars in mortgages on the United States properties, thereby allowing

MANAFORT to have the benefits of liquid income without paying taxes on it. MANAFORT and GATES defrauded the lenders in various ways, including by lying about MANAFORT's and DMI's income, lying about their debt, and lying about MANAFORT's use of the property and the loan proceeds. For example, MANAFORT and GATES submitted fabricated profit and loss statements (P&Ls) that inflated income, and they caused others to provide doctored financial documents.

A. The Loan From Lender A On The Union Street Property

28. In 2012, MANAFORT, through a corporate vehicle called "MC Brooklyn Holdings, LLC" owned by him and his family, bought a brownstone on Union Street in the Carroll Gardens section of Brooklyn, New York. He paid approximately \$3,000,000 in cash for the property. All of that money came from a MANAFORT-GATES entity in Cyprus. After purchase of the property, MANAFORT began renovations to transform it from a multi-family dwelling into a single-family home. MANAFORT used proceeds of a 2015 loan obtained from a financial institution to make the renovations. In order to obtain that loan, MANAFORT falsely represented to the bank that he did not derive more than 50% of his income/wealth from a country outside the United States.

29. In late 2015 through early 2016, MANAFORT sought to borrow cash against the Union Street property from Lender A. Lender A provided greater loan amounts for "construction loans"—that is, loans that required the loan funds to be used to pay solely for construction on the property and thus increase the value of the property serving as the loan's collateral. The institution would thus loan money against the expected completed value of the property, which in the case of the Union Street property was estimated to be \$8,000,000. In early 2016, MANAFORT was able to obtain a loan of approximately \$5,000,000, after promising Lender A that approximately \$1,400,000 of the loan would be used solely for construction on the Union Street property.

MANAFORT never intended to limit use of the proceeds to construction as required by the loan contracts and never did. In December 2015, before the loan was made, MANAFORT wrote his tax preparer, among others, that the “construction mortgage will allow me to pay back [another Manafort apartment] mortgage in full. . . .” Further, when the construction loan closed, MANAFORT used hundreds of thousands of dollars for purposes unrelated to the construction of the property.

B. The Loan From Lender B On The Howard Street Property

30. In 2012, MANAFORT, through a corporate vehicle called “MC Soho Holdings, LLC” owned by him and his family, bought a condominium on Howard Street in the Soho neighborhood of Manhattan, New York. He paid approximately \$2,850,000. All the money used to purchase the condominium came from MANAFORT–GATES entities in Cyprus. MANAFORT used the property from at least January 2015 through at least August 2017 as an income-generating rental property, charging thousands of dollars a week on Airbnb, among other places. On his tax returns, MANAFORT took advantage of the beneficial tax consequences of owning this rental property.

31. In late 2015 through early 2016, MANAFORT applied for a mortgage on the Howard Street condominium from Lender B for approximately \$3.4 million. Because the bank would permit a greater loan amount if the property were owner-occupied, MANAFORT falsely represented to the lender and its agents that it was a secondary home used as such by his daughter and son-in-law and was not held as a rental property. In an email on January 6, 2016, MANAFORT noted: “[i]n order to have the maximum benefit, I am claiming Howard St. as a second home. Not an investment property.” Later, on January 26, 2016, MANAFORT wrote to his son-in-law to advise him that when the bank appraiser came to assess the condominium, his son-in-law should “[r]emember, he believes that you and [MANAFORT’s daughter] are living there.”

32. MANAFORT, with GATES' assistance, also made a series of false and fraudulent representations to the bank in order to secure the millions of dollars in financing. For example, MANAFORT falsely represented the amount of debt he had by failing to disclose on his loan application the existence of the Lender A mortgage on his Union Street property. That liability would have risked his qualifying for the loan. Through its own due diligence, Lender B found evidence of the existing mortgage on the Union Street property. As a result, Lender B wrote to MANAFORT and GATES that the "application has the following properties as being owned free & clear . . . Union Street," but "[b]ased on the insurance binders that we received last night, we are showing that there are mortgages listed on these properties, can you please clarify[?]"

33. To cover up the falsity of the loan application, GATES, on MANAFORT's behalf, caused an insurance broker to provide Lender B false information, namely, an outdated insurance report that did not list the Union Street loan. MANAFORT and GATES knew such a representation was fraudulent. After GATES contacted the insurance broker and asked her to provide Lender B with false information, he updated MANAFORT by email on February 24, 2016. MANAFORT replied to GATES, on the same day: "good job on the insurance issues."

34. MANAFORT and GATES submitted additional false and fraudulent statements to Lender B. For example, MANAFORT<sup>4</sup> submitted 2014 DMI tax returns to support his 2016 loan application to Lender B. Those tax returns included as a purported liability a \$1.5 million loan from Peranova. Peranova was a Cypriot entity controlled by MANAFORT and GATES. On or about February 1, 2012, Peranova transferred \$1.5 million to a DMI account in the United States, denominating the transfer as a loan so that MANAFORT would not have to declare the money as income. MANAFORT used the "loan" to acquire the Howard Street property.

35. When MANAFORT needed to obtain a loan from Lender B, the existence of the Peranova

“loan” undermined his creditworthiness. As a result of the listed Peranova liability, Lender B was not willing to make the loan to MANAFORT. To circumvent this issue, MANAFORT and GATES caused MANAFORT’s tax accountant to send to Lender B back-dated documentation that falsely stated that the \$1.5 million Peranova loan had been forgiven in 2015, and falsely inflated income for 2015 to mask MANAFORT’s 2015 drop in income.

36. In March 2016, Lender B approved the loan in the amount of approximately \$3.4 million (the \$3.4 million loan).

### C. The Loan From Lender C

37. In approximately February 2016, MANAFORT applied for a business loan from Lender C. MANAFORT made a series of false statements to Lender C. For example, MANAFORT submitted a false statement of assets and liabilities that failed to disclosed the Lender A loan on the Union Street property and misrepresented, among other things, the amount of the mortgage on the Howard Street property.

38. Further, in approximately March 2016, MANAFORT and GATES submitted a doctored 2015 DMI P&L that overstated DMI’s 2015 income by more than \$4 million. GATES asked DMI’s bookkeeper to send him a “Word Document version of the 2015 P&L for [DMI]” because MANAFORT wanted GATES “to add the accrual revenue which we have not received in order to send to [Lender C].” The bookkeeper said she could send a .pdf version of the P&L. GATES then asked the bookkeeper to increase the DMI revenue, falsely claiming that: “[w]e have \$2.4m in accrued revenue that [MANAFORT] wants added to the [DMI] 2015 income. Can you make adjustments on your end and then just send me a new scanned version[?]” The bookkeeper refused since the accounting method DMI used did not permit recording income before it was actually received.



39. Having failed to secure a falsified P&L from the bookkeeper, GATES falsified the P&L. GATES wrote to MANAFORT and another conspirator, “I am editing Paul’s 2015 P&L statement.” GATES then sent the altered P&L to Lender C, which claimed approximately \$4.45 million in net income, whereas the true P&L had less than \$400,000 in net income.

D. The Loan From Lender B On The Union Street Property

40. In March 2016, MANAFORT, with the assistance of GATES and others, applied for a \$5.5 million loan from Lender B on the Union Street property. As part of the loan process, MANAFORT submitted a false statement of assets and liabilities that hid his prior loan from Lender A on the Union Street property, among other liabilities. In addition, another conspirator on MANAFORT’s behalf submitted a falsified 2016 DMI P&L. The falsified 2016 DMI P&L overstated DMI’s income by more than \$2 million, which was the amount that Lender B told MANAFORT he needed to qualify for the loan. When the document was first submitted to Lender B, a conspirator working at Lender B replied: “Looks Dr’d. Can’t someone just do a clean excel doc and pdf to me??” A subsequent version was submitted to the bank.

E. The Loans From Lender D On The Bridgehampton And Union Street Properties

41. In 2016, MANAFORT sought a mortgage on property in Bridgehampton, New York from a financial institution. In connection with his application, MANAFORT falsely represented to the bank that DMI would be receiving \$2.4 million in income later in the year for work on a “democratic development consulting project.” To support this representation, GATES, on MANAFORT’s behalf, provided the bank with a fake invoice for \$2.4 million, directed “To Whom It May Concern,” for “[s]ervices rendered per the consultancy agreement pertaining to the parliamentary elections.” The bank, unwilling to rely on the invoice to support MANAFORT’s stated 2016 income, requested additional information. The bank was unable to obtain satisfactory

support for the stated income, and the loan application was denied.

42. MANAFORT applied to a second bank, Lender D. Between approximately July 2016 and January 2017, MANAFORT, with the assistance of GATES, sought and secured approximately \$16,000,000 in two loans from Lender D. MANAFORT used the Bridgehampton property as collateral for one loan, and the Union Street property for the other.

43. MANAFORT and GATES made numerous false and fraudulent representations to secure the loans. For example, MANAFORT provided the bank with doctored P&Ls for DMI for both 2015 and 2016, overstating its income by millions of dollars. The doctored 2015 DMI P&L submitted to Lender D was the same false statement previously submitted to Lender C, which overstated DMI's income by more than \$4 million. The doctored 2016 DMI P&L was inflated by MANAFORT by more than \$3.5 million. To create the false 2016 P&L, on or about October 21, 2016, MANAFORT emailed GATES a .pdf version of the real 2016 DMI P&L, which showed a loss of more than \$600,000. GATES converted that .pdf into a "Word" document so that it could be edited, which GATES sent back to MANAFORT. MANAFORT altered that "Word" document by adding more than \$3.5 million in income. He then sent this falsified P&L to GATES and asked that the "Word" document be converted back to a .pdf, which GATES did and returned to MANAFORT. MANAFORT then sent the falsified 2016 DMI P&L .pdf to Lender D.

44. In addition, Lender D questioned MANAFORT about a \$300,000 delinquency on his American Express card, which was more than 90 days past due. The delinquency significantly affected MANAFORT's credit rating score. MANAFORT falsely represented to Lender D that he had lent his credit card to a friend, GATES, who had incurred the charges and had not reimbursed him. MANAFORT supplied Lender D a letter from GATES that falsely stated that

GATES had borrowed MANAFORT's credit card to make the purchases at issue and would pay him back by a date certain.

### Statutory Allegations

#### COUNTS ONE THROUGH FIVE (Subscribing to False United States Individual Income Tax Returns For 2010–2014 Tax Years)

45. Paragraphs 1 through 44 are incorporated here.
46. On or about the dates specified below, in the Eastern District of Virginia and elsewhere, defendant PAUL J. MANAFORT, JR., willfully and knowingly did make and subscribe, and aid and abet and cause to be made and subscribed, United States Individual Income Tax Returns, Forms 1040 and Schedule B, for the tax years set forth below, which returns contained and were verified by the written declaration of MANAFORT that they were made under penalties of perjury, and which returns MANAFORT did not believe to be true and correct as to every material matter, in that the returns (a) claimed that MANAFORT did not have a financial interest in and signature and other authority over a financial account in a foreign country and (b) failed to report income, whereas MANAFORT then and there well knew and believed that he had a financial interest in, and signature and other authority over, bank accounts in a foreign country and had earned total income in excess of the reported amounts noted below:

COUNT	TAX YEAR	APPROX. FILING DATE	FOREIGN ACCOUNT REPORTED (Sch. B, Line 7a)	TOTAL INCOME REPORTED (Line 22)
1	2010	October 14, 2011	None	\$504,744
2	2011	October 15, 2012	None	\$3,071,409
3	2012	October 7, 2013	None	\$5,361,007
4	2013	October 6, 2014	None	\$1,910,928
5	2014	October 14, 2015	None	\$2,984,210

(26 U.S.C. § 7206(l); 18 U.S.C. §§ 2 and 3551 et seq.)

**COUNTS SIX THROUGH TEN**  
 (Assisting in the Preparation of  
 False United States Individual Income  
 Tax Returns For 2010–2014 Tax Years)

47. Paragraphs 1 through 44 are incorporated here.

48. On or about the dates specified below, in the Eastern District of Virginia and elsewhere, defendant RICHARD W. GATES III willfully and knowingly did aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a United States Individual Income Tax Return, Form 1040 and Schedule B, of PAUL J. MANAFORT, JR., for the tax years set forth below, which returns were false and fraudulent as to a material matter, in that the returns (a) claimed that MANAFORT did not have a financial interest in, and signature and other authority over, a financial account in a foreign country and (b) failed to report income, whereas GATES then and there well knew and believed that MANAFORT had a financial interest in, and signature and other authority over, bank accounts in a foreign country and had earned total income in excess of the reported amounts noted below:

COUNT	TAX YEAR	APPROX. FILING DATE	FOREIGN ACCOUNT REPORTED (Sch. B, Line 7a)	TOTAL INCOME REPORTED (Line 22)
6	2010	October 14, 2011	None	\$504,744
7	2011	October 15, 2012	None	\$3,071,409
8	2012	October 7, 2013	None	\$5,361,007
9	2013	October 6, 2014	None	\$1,910,928
10	2014	October 14, 2015	None	\$2,984,210

(26 U.S.C. § 7206(2); 18 U.S.C. § 3551 *et seq.*)

**COUNTS ELEVEN THROUGH FOURTEEN**  
 (Failure To File Reports Of Foreign Bank And Financial  
 Accounts For Calendar Years 2011–2014)

49. Paragraphs 1 through 44 are incorporated here.

50. On the filing due dates listed below, in the Eastern District of Virginia and elsewhere,

defendant PAUL J. MANAFORT, JR., unlawfully, willfully, and knowingly did fail to file with the Treasury an FBAR disclosing that he had a financial interest in, and signature and other authority over, a bank, securities, and other financial account in a foreign country, which had an aggregate value of more than \$10,000 in a 12-month period, during the years listed below:

COUNT	YEAR	DUE DATE TO FILE FBAR
11	2011	June 29, 2012
12	2012	June 30, 2013
13	2013	June 30, 2014
14	2014	June 30, 2015

(31 U.S.C. §§ 5314 and 5322(a); 18 U.S.C. §§ 2 and 3551 et seq.)

**COUNTS FIFTEEN THROUGH NINETEEN**  
 (Subscribing to False United States Individual Income  
 Tax Returns For 2010–2014 Tax Years)

51. Paragraphs 1 through 44 are incorporated here.

52. On or about the dates specified below, in the Eastern District of Virginia and elsewhere, defendant RICHARD W. GATES III willfully and knowingly did make and subscribe, and aid and abet and cause to be made and subscribed, United States Individual Income Tax Returns, Forms 1040 and Schedule B, for the tax years set forth below, which returns contained and were verified by the written declaration of defendant GATES that they were made under penalties of perjury, and which returns defendant GATES did not believe to be true and correct as to every material matter, in that the returns (a) claimed that GATES did not have a financial interest in, and signature and other authority over, a financial account in a foreign country and (b) failed to report income, whereas GATES then and there well knew and believed that he had a financial interest in, and signature and other authority over, a financial account in a foreign country and had earned total income in excess of the reported amounts noted below:

COUNT	TAX YEAR	APPROX. FILING DATE	FOREIGN ACCOUNT REPORTED (Sch. B, Line 7a)	TOTAL INCOME REPORTED (Line 22)
15	2010	July 26, 2011	None	\$194,257
16	2011	October 11, 2012	None	\$250,307
17	2012	October 15, 2013	None	\$365,646
18	2013	October 15, 2014	None	\$307,363
19	2014	October 14, 2015	None	\$292,892

(26 U.S.C. § 7206(l); 18 U.S.C. §§ 2 and 3551 et seq.)

#### COUNT TWENTY

(Subscribing to a False Amended United States Individual Income Tax Return For 2013 Tax Year)

53. Paragraphs 1 through 44 are incorporated here.

54. On or about October 25, 2017, in the Eastern District of Virginia and elsewhere, defendant RICHARD W. GATES III willfully and knowingly did make and subscribe, and aid and abet and cause another to make and subscribe, a United States Individual Income Tax Return, Form 1040X, for the 2013 tax year, which return contained and was verified by the written declaration of defendant GATES that it was made under penalties of perjury, and which return defendant GATES did not believe to be true and correct as to every material matter, in that the return failed to report income, whereas GATES then and there well knew and believed that he had earned adjusted gross income in excess of the reported amount on Line 1C, to wit: \$292,055.

(26 U.S.C. § 7206(l); 18 U.S.C. §§ 2 and 3551 et seq.)

#### COUNTS TWENTY-ONE THROUGH TWENTY-THREE

(Failure To File Reports Of Foreign Bank And Financial Accounts For Calendar Years 2011–2013)

55. Paragraphs 1 through 44 are incorporated here.

56. On the filing due dates listed below, in the Eastern District of Virginia and elsewhere, defendant RICHARD W. GATES III unlawfully, willfully, and knowingly did fail to file with the



Treasury an FBAR disclosing that he had a financial interest in, and signature authority over, a bank, securities, and other financial account in a foreign country, which had an aggregate value of more than \$10,000 in a 12-month period, during the years listed below:

COUNT	YEAR	DUE DATE TO FILE FBAR
21	2011	June 29, 2012
22	2012	June 30, 2013
23	2013	June 30, 2014

(31 U.S.C. §§ 5314 and 5322(a); 18 U.S.C. §§ 2 and 3551 et seq.)

COUNT TWENTY-FOUR

(Bank Fraud Conspiracy / Lender B / \$3.4 million loan)

57. Paragraphs 1 through 44 are incorporated here.

58. On or about and between December 2015 and March 2016, both dates being approximate and inclusive, in the Eastern District of Virginia and elsewhere, defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III did knowingly and intentionally conspire to execute a scheme and artifice to defraud one or more financial institutions, to wit: Lender B, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits owned by and under the custody and control of such financial institution by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

(18 U.S.C. §§ 1349 and 3551 et seq.)

COUNT TWENTY-FIVE

(Bank Fraud / Lender B / \$3.4 million loan)

59. Paragraphs 1 through 44 are incorporated here.

60. On or about and between December 2015 and March 2016, both dates being approximate

and inclusive, in the Eastern District of Virginia and elsewhere, defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud one or more financial institutions, to wit: Lender B, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits owned by and under the custody and control of such financial institution by means of materially false and fraudulent pretenses, representations, and promises.

(18 U.S.C. §§ 1344, 2, and 3551 et seq.)

COUNT TWENTY-SIX

(Bank Fraud Conspiracy / Lender C / \$1 million loan)

61. Paragraphs 1 through 44 are incorporated here.

62. On or about and between March 2016 and May 2016, both dates being approximate and inclusive, in the Eastern District of Virginia and elsewhere, defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III did knowingly and intentionally conspire to execute a scheme and artifice to defraud one or more financial institutions, to wit: Lender C, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits owned by and under the custody and control of such financial institution by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

(18 U.S.C. §§ 1349 and 3551 et seq.)

COUNT TWENTY-SEVEN

(Bank Fraud / Lender C / \$1 million loan)

63. Paragraphs 1 through 44 are incorporated here.

64. On or about and between December 2015 and March 2016, both dates being approximate and inclusive, in the Eastern District of Virginia and elsewhere, defendants PAUL J.

MANAFORT, JR., and RICHARD W. GATES III did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud one or more financial institutions, to wit: Lender C, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits owned by and under the custody and control of such financial institution by means of materially false and fraudulent pretenses, representations, and promises.

(18 U.S.C. §§ 1344, 2, and 3551 et seq.)

COUNT TWENTY-EIGHT

(Bank Fraud Conspiracy / Lender B / \$5.5 million loan)

65. Paragraphs 1 through 44 are incorporated here.

66. On or about and between March 2016 and August 2016, both dates being approximate and inclusive, in the Eastern District of Virginia and elsewhere, defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III did knowingly and intentionally conspire to execute a scheme and artifice to defraud one or more financial institutions, to wit: Lender B, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits owned by and under the custody and control of such financial institution by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

(18 U.S.C. §§ 1349 and 3551 et seq.)

COUNT TWENTY-NINE

(Bank Fraud Conspiracy / Lender D / \$9.5 million loan)

67. Paragraphs 1 through 44 are incorporated here.

68. On or about and between April 2016 and November 2016, both dates being approximate and inclusive, in the Eastern District of Virginia and elsewhere, defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III did knowingly and intentionally conspire to

execute a scheme and artifice to defraud one or more financial institutions, to wit: Lender D, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits owned by and under the custody and control of such financial institution by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

(18 U.S.C. §§ 1349 and 3551 et seq.)

COUNT THIRTY

(Bank Fraud / Lender D / \$9.5 million loan)

69. Paragraphs 1 through 44 are incorporated here.

70. On or about and between April 2016 and November 2016, both dates being approximate and inclusive, in the Eastern District of Virginia and elsewhere, defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud one or more financial institutions, to wit: Lender D, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits owned by and under the custody and control of such financial institution by means of materially false and fraudulent pretenses, representations, and promises.

(18 U.S.C. § 1344, 2, and 3551 et seq.)

COUNT THIRTY-ONE

(Bank Fraud Conspiracy / Lender D / \$6.5 million loan)

71. Paragraphs 1 through 44 are incorporated here.

72. On or about and between April 2016 and January 2017, both dates being approximate and inclusive, in the Eastern District of Virginia and elsewhere, defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III did knowingly and intentionally conspire to execute a scheme and artifice to defraud one or more financial institutions, to wit: Lender D, the deposits of which

were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits owned by and under the custody and control of such financial institution by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

(18 U.S.C. §§ 1349 and 3551 et seq.)

COUNT THIRTY-TWO  
(Bank Fraud / Lender D / \$6.5 million loan)

73. Paragraphs 1 through 44 are incorporated here.

74. On or about and between April 2016 and January 2017, both dates being approximate and inclusive, in the Eastern District of Virginia and elsewhere, defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud one or more financial institutions, to wit: Lender D, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits owned by and under the custody and control of such financial institution by means of materially false and fraudulent pretenses, representations, and promises.

(18 U.S.C. §§ 1344, 2, and 3551 et seq.)

FORFEITURE NOTICE

75. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 982(a)(2), in the event of the defendants' convictions under Counts Twenty-Four through Thirty-Two of this Superseding Indictment. Upon conviction of the offenses charged in Counts Twenty-Four through Thirty-Two, defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III shall forfeit to the United States any property constituting, or derived from, proceeds

obtained, directly or indirectly, as a result of such violation(s). Notice is further given that, upon conviction, the United States intends to seek a judgment against each defendant for a sum of money representing the property described in this paragraph, as applicable to each defendant (to be offset by the forfeiture of any specific property).

76. The grand jury finds probable cause to believe that the property subject to forfeiture by PAUL J. MANAFORT, JR., includes, but is not limited to, the following listed assets:

- a. All funds held in account number XXXXXX0969 at Lender D, and any property traceable thereto.

Substitute Assets

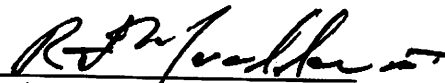
77. If any of the property described above as being subject to forfeiture, as a result of any act or omission of any defendant

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States of America, pursuant to Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853, to seek forfeiture of any other property of said defendant.

(18 U.S.C. § 982)



  
Robert S. Mueller, III  
Special Counsel  
Department of Justice

**A TRUE BILL:**  
Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office. \*

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**Foreperson**

**Date: February 22, 2018**

# **ATTACHMENT D**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division



UNITED STATES OF AMERICA, )  
 )  
 v. )  
 )  
 PAUL J. MANAFORT, JR., )  
 Defendant. )

Criminal No. 1:18-CR-83

JURY VERDICT FORM

We the jury find as follows:

**COUNT 1:** Subscribing to False United States Individual Income Tax Return for 2010

☐ Not Guilty

☒ Guilty

**COUNT 2:** Subscribing to False United States Individual Income Tax Return for 2011

☐ Not Guilty

☒ Guilty

**COUNT 3:** Subscribing to False United States Individual Income Tax Return for 2012

☐ Not Guilty

☒ Guilty

**COUNT 4:** Subscribing to False United States Individual Income Tax Return for 2013

☐ Not Guilty

☒ Guilty

**COUNT 5:** Subscribing to False United States Individual Income Tax Return for 2014

☐ Not Guilty

☒ Guilty

**COUNT 11: Failure to File Reports of Foreign Bank and Financial Accounts 2011**

☐ Not Guilty

☐ Guilty

NO CONSENSUS

G N  
11 to 1

**COUNT 12: Failure to File Reports of Foreign Bank and Financial Accounts 2012**

☐ Not Guilty

☒ Guilty

**COUNT 13: Failure to File Reports of Foreign Bank and Financial Accounts 2013**

☐ Not Guilty

☒ Guilty

NO CONSENSUS

G N  
11 to 1

**COUNT 14: Failure to File Reports of Foreign Bank and Financial Accounts 2014**

☐ Not Guilty

☒ Guilty

NO CONSENSUS

G N  
11 to 1

**COUNT 24: Bank Fraud Conspiracy on or about December 2015 to March 2016**

☐ Not Guilty

☐ Guilty

NO CONSENSUS

G N  
11 to 1

**COUNT 25: Bank Fraud on or about December 2015 to March 2016**

☐ Not Guilty

☒ Guilty

**COUNT 26: Bank Fraud Conspiracy on or about March 2016 to May 2016**

☐ Not Guilty

☐ Guilty

NO CONSENSUS

G N  
11 to 1

**COUNT 27:** Bank Fraud on or about December 2015 to March 2016

☐ Not Guilty

☒ Guilty

**COUNT 28:** Bank Fraud Conspiracy on or about March 2016 to August 2016

☐ Not Guilty

☐ Guilty

NO CONSENSUS

G N  
11 to 1

**COUNT 29:** Bank Fraud Conspiracy on or about April 2016 to November 2016

☐ Not Guilty

☐ Guilty

NO CONSENSUS

G N  
11 to 1

**COUNT 30:** Bank Fraud on or about April 2016 to November 2016

☐ Not Guilty

☐ Guilty

NO CONSENSUS

G N  
11 to 1

**COUNT 31:** Bank Fraud Conspiracy on or about April 2016 to January 2017

☐ Not Guilty

☐ Guilty

NO CONSENSUS

G N  
11 to 1

**COUNT 32:** Bank Fraud on or about April 2016 to January 2017

☐ Not Guilty

☐ Guilty

NO CONSENSUS

G N  
11 to 1

SO SAY WE ALL.

08.21.18

Date

REDACTED

# **ATTACHMENT E**



IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

V.

PAUL J. MANAFORT, JR.,

Defendant.

Crim. No. 1:18-cr-83 (TSE)

## THE GOVERNMENT'S SENTENCING MEMORANDUM

The United States of America, by and through Special Counsel Robert S. Mueller, III,  
files this submission to address the sentencing of defendant Paul J. Manafort, Jr.

As an initial matter, the government agrees with the guidelines analysis in the Presentence Investigation Report (PSR) and its calculation of the defendant's Total Offense Level as 38 with a corresponding range of imprisonment of 235 to 293 months, a fine range of \$50,000 to \$24,371,497.74, a term of supervised release of up to five years, restitution in the amount of \$24,815,108.74, and forfeiture in the amount of \$4,412,500.

Second, while the government does not take a position as to the specific sentence to be imposed here, the government sets forth below its assessment of the nature of the offenses and the characteristics of the defendant under Title 18, United States Code, Section 3553(a). The defendant stands convicted of the serious crimes of tax fraud, bank fraud, and failing to file a foreign bank account report. Manafort was the lead perpetrator and a direct beneficiary of each offense. And while some of these offenses are commonly prosecuted, there was nothing ordinary about the millions of dollars involved in the defendant's crimes, the duration of his

criminal conduct, or the sophistication of his schemes.<sup>1</sup> Together with the relevant criminal conduct, Manafort's misconduct involved more than \$16 million in unreported income resulting in more than \$6 million in federal taxes owed, more than \$55 million hidden in foreign bank accounts, and more than \$25 million secured from financial institutions through lies resulting in a fraud loss of more than \$6 million. Manafort committed these crimes over an extended period of time, from at least 2010 to 2016. His criminal decisions were not momentary or limited in time; they were routine. And Manafort's repeated misrepresentations to financial institutions were brazen, at least some of which were made at a time when he was the subject of significant national attention.

Neither the Probation Department nor the government is aware of any mitigating factors. Manafort did not commit these crimes out of necessity or hardship. He was well educated, professionally successful, and financially well off. He nonetheless cheated the United States Treasury and the public out of more than \$6 million in taxes at a time when he had substantial resources. Manafort committed bank fraud to supplement his liquidity because his lavish spending exhausted his substantial cash resources when his overseas income dwindled.

Finally, Manafort pled guilty in September 2018 in the United States District Court for the District of Columbia to others crimes committed over an even longer period. The government references those crimes below principally as they pertain to the Section 3553(a) factors and, in particular, because they demonstrate the defendant's concerted criminality, including the conduct to which he pled guilty, from as early as 2005 and continuing up until the

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<sup>1</sup>Manafort was being investigated prior to the May 2017 appointment of the Special Counsel by prosecutors in this district and the Criminal Division of the Department of Justice. See Motion Hearing Tr., May 4, 2018, at 4.

## I. Procedural History

The defendant proceeded to trial on July 31, 2018 and, on August 21, the jury convicted the defendant on eight counts: Counts 1 through 5 (filing false income tax returns for the years 2010 to 2014); Count 12 (failing to file a report of foreign bank and financial accounts (FBAR) in 2012), and Counts 25 and 27 (bank fraud relating to a Citizens Bank loan for the Howard Street property in New York, and a Banc of California commercial loan, respectively). The jury did not reach a verdict on the remaining ten counts.<sup>2</sup>

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## II. Trial Evidence

Given the Court's familiarity with the trial evidence, the government only briefly outlines it below.

### A. Tax Charges

Manafort's tax returns were false as to the stated income and the fact that in each year Manafort failed to report the existence of his overseas bank accounts. The government proved Manafort's unreported income through a series of payments from his overseas accounts to vendors for various goods and services and for the purchase and improvement of real estate in New York and Virginia.<sup>3</sup> FBI Forensic Accountant Morgan Magionos traced each wire transfer, detailing the banks and accounts over the period from 2010 to 2014, and calculated the total

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<sup>3</sup>The evidence supporting the false returns included both testimony and documentary evidence. Eight vendors testified about receiving payments from overseas accounts for goods, services, or real estate purchased by the defendant in the United States. *See* Trial Tr. at 285-312 (Testimony of Maximillian Katzman from Alan Couture); *id.* at 312-29 (Testimony of Ronald Wall from House of Bijan); *id.* at 339-49 (Testimony of Daniel Opsut from American Service Center/Mercedes-Benz of Alexandria); *id.* at 349-59 (Testimony of Wayne Holland from McEneaney Associates); *id.* at 361-91 (Testimony of Stephen Jacobson from SP&C Home Improvement); *id.* at 393-410 (Testimony of Doug DeLuca from Federal Stone and Brick); *id.* at 435-461 (Testimony of Joel Maxwell from Big Picture Solutions); *id.* at 469-91 (Testimony of Michael Regolizio from New Leaf Landscape). This testimony was corroborated by invoices, banks statements, emails, and other documentary evidence. *See, e.g.*, Government Exhibit 94A (SP&C Home Improvement Invoices 2010-2014); Government Exhibit 95A (SP&C Home Improvement Bank Records); Government Exhibit 97A (Alan Couture Invoices 2010-2014); Government Exhibit 98 (Alan Couture Bank Records); Government Exhibit 99 (March 21, 2011 Email from Manafort to M. Katzman). Evidence with respect to six additional vendors and three real estate purchases, and supporting documentation, was admitted by stipulation. *See e.g.*, Government Exhibit 327 (Stipulation Regarding Aegis Holdings, LLC); Government Exhibit 329 (Stipulation Regarding J&J Oriental Rug Gallery); Government Exhibit 332 (Stipulation Regarding Don Beyer Motors, Inc.); Government Exhibit 334 (Stipulation Regarding Sabatello Construction of Florida, Inc.); Government Exhibit 335 (Stipulation Regarding Scott L. Wilson Landscaping & Tree Specialists, Inc.); Government Exhibit 336 (Stipulation Regarding Sensoryphile, Inc.); Government Exhibit 328 (Stipulation Relating to the Purchase of 377 Union Street, Brooklyn, New York); Government Exhibit 330 (Stipulation Relating to the Purchase of 29 Howard Street #4, New York, New York); Government Exhibit 331 (Stipulation Relating to the Purchase of 1046 N. Edgewood Street, Arlington, Virginia).

amount to be \$15,571,046, as reflected on Government Exhibit 72 (attached as Exhibit A).<sup>4</sup>

Additionally, the government proved that Manafort further misrepresented his income by falsely characterizing certain income as loans.<sup>5</sup>

IRS Revenue Agent Michael Welch testified that Manafort failed to report more than \$16 million in income on line 22 of his tax returns during tax years 2010 through 2014, as documented in Government Exhibit 77 (attached as Exhibit B).<sup>6</sup> Welch also testified that Manafort failed to identify any of his foreign bank accounts on Schedule B, Line 7A for the years from 2010 to 2014.<sup>7</sup> The IRS has determined that Manafort owed \$6,164,032 in taxes for his unreported income. See PSR, ¶ 36.

#### **B. FBAR Charges**

Manafort was found guilty of the Count 12 FBAR charge relating to 2012. Under the Sentencing Guidelines the FBAR charges in Counts 11, 13 and 14, for the years 2011, 2013, and 2014, respectively, constitute relevant conduct. See PSR, ¶ 75. FBI Forensic Accountant Magionos, using a series of charts, testified that Manafort maintained 31 overseas accounts in three countries and listed the aggregate maximum value in those accounts in each year from 2011 to 2014 as reflected on the following exhibits:<sup>8</sup>

- Government Exhibit 73B documented the aggregate maximum value of foreign bank accounts controlled by Manafort in 2011 that totaled approximately \$8.3 million;

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<sup>4</sup>See Trial Tr. at 1617-20 (Testimony of Morgan Magionos).

<sup>5</sup>See Trial Tr. at 903-06 (Cindy LaPorta testified that Gates proposed changing the amount of Manafort's alleged loans to reduce his total taxable income); see id. at 1107-09 (Gates testified that at Manafort's direction he instructed Manafort's bookkeeper and tax preparers to treat certain income as loans to avoid paying taxes on the income).

<sup>6</sup>See Trial Tr. at 1679-82 (Testimony of Michael Welch).

<sup>7</sup>Id. at 1695-97.

<sup>8</sup>See Trial Tr. at 1620-24 (Testimony of Morgan Magionos).

- Government Exhibit 73C documented the aggregate maximum value of foreign bank accounts controlled by Manafort in 2012 that totaled approximately \$25.7 million;
- Government Exhibit 73D documented the aggregate maximum value of foreign bank accounts controlled by Manafort in 2013 that totaled approximately \$18.7 million;
- Government Exhibit 73E documented the aggregate maximum value of foreign bank accounts in 2014 that totaled approximately \$2.7 million.<sup>9</sup>

Copies of Government Exhibits 73B, 73C, 73D and 73E are attached as Exhibit C.

### **C. Bank Frauds**

The jury convicted Manafort of the two bank fraud schemes charged in Counts 25 and 27. Manafort sought both loans at a time when he was no longer receiving income from Ukraine.

Count 25 charged Manafort with defrauding Citizens Bank of \$3.4 million relating to a loan for property on Howard Street in New York, New York. As part of that fraud, the government proved at trial that the defendant made, or caused to be made, the following three material false statements between December 2015 and March 2016: (1) that the Howard Street residence was his second home; (2) that a \$1.5 million dollar loan from a Cyprus entity named Peranova had been forgiven in the prior year; and (3) that there was no mortgage on Manafort's Union Street property in Brooklyn, New York.<sup>10</sup> Two bank witnesses, Manafort's tax preparer and bookkeeper, and Rick Gates testified to the details of the charged scheme. Their testimony

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<sup>9</sup>Special Agent Paula Liss from the Financial Crimes Enforcement Network testified that no FBAR reports were filed by Manafort or his related entities in the relevant time period. See Trial Tr. at 1080-81; 2293-94.

<sup>10</sup>See Trial Tr. at 2409 (government summation identifying false statements relating to the Counts 24 and 25 Citizens Bank fraud/conspiracy charges involving the Howard Street property).



was corroborated by a series of emails, tax returns, and insurance documents, among other documentary evidence.<sup>11</sup>

Manafort was also convicted, in Count 27, of defrauding the Banc of California with respect to a \$1 million dollar commercial loan. The government proved at trial that the defendant made, or caused to be made, the following material false statements: (1) omitting to report his Howard Street mortgage on his loan application; and (2) submitting a materially false 2015 DMP Profit and Loss Statement.<sup>12</sup> Among other evidence, Washkuhn and Gates testified about the false DMP Profit and Loss Statements submitted to the bank, with Gates explaining the various emails in which Manafort directed him to manipulate the relevant financial statement.<sup>13</sup>

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<sup>11</sup>Melinda James (née Francis) from Citizens Bank testified that Manafort represented the Howard Street property to be a second home and that Manafort represented that there was no mortgage on the Union Street property. See Trial Tr. at 1747, 1755. Tax preparer Cindy LaPorta testified about her representations relating to the Peranova loan to Citizens Bank, notwithstanding the fact that she had concerns it was never a loan at all, see Trial Tr. at 944-59, as did Gates, who also noted that money from Peranova was income and was never a loan, see Trial Tr. at 1297-1308. Bookkeeper Heather Washkuhn testified that at the time of the Howard Street loan, there was a mortgage on the Union Street property. See Trial Tr. at 596-601. The supporting documentary evidence included the following: Government Exhibit 227 (Manafort's bank application identifying the Howard Street property as a second residence); Government Exhibit 337L (2015 MC Soho Tax Return reporting \$115,987 in rental income for Howard Street apartment); Government Exhibit 337M (2016 MC Soho Tax Return reporting \$108,000 in rental income for Howard Street apartment); Government Exhibit 127 (February 5, 2015 email relating to rental income from the Howard Street apartment); Government Exhibit 503 (March 12, 2016 email relating to rental earnings generated from the Howard Street property); Government Exhibit 422 (January 26, 2016 email from Manafort to his son-in-law reminding him that the appraiser is coming to the Howard Street apartment, who believes that the son-in-law and his wife live in the apartment); Government Exhibit 118 (Airbnb records relating to the rental of the Howard Street apartment); Government Exhibit 500 (Stipulation regarding Genesis Capital mortgage on Union Street Property).

<sup>12</sup>See Trial Tr. at 2418-21 (government summation identifying false statements relating to the Counts 26 and 27 Banc of California commercial loan fraud/conspiracy).

<sup>13</sup>Gates testified that at Manafort's direction he altered the 2015 DMP Profit and Loss Statement that was ultimately sent to the Banc of California. See Trial Tr. at 1317-26. Washkuhn testified to the falsity of the submitted 2015 DMP Profit and Loss Statement. See Trial Tr. at 601-19. The supporting documentary evidence included among other evidence: Government Exhibit 140 (March 16, 2016 emails between Gates and Washkuhn involving the 2015 DMP Profit and Loss Statement); Government Exhibit 392 (March 16, 2016 email between Manafort and Gates involving the 2015 DMP Profit and Loss Statement); and Government Exhibit 298 (March 16, 2016 email from Manafort to Perris Kaufman

With respect to the three other bank frauds for which the jury failed to reach a verdict, one involving a \$5.5 million loan from Citizens Bank (charged only as a conspiracy) and two involving loans from The Federal Savings Bank, one for \$9.5 million and the other for \$6.5 million, respectively, the defendant admitted to his involvement in each of these bank frauds as part of his guilty plea in the District of Columbia.<sup>14</sup> The evidence at trial established those same facts through witness testimony and documentary evidence.<sup>15</sup>

With respect to the Union Street loan conspiracy involving Citizens Bank, charged in Count 28, Manafort pledged his property at 377 Union Street in Brooklyn, New York. At the

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attaching false 2015 DMP Profit and Loss Statement). Gary Seferian, Senior Vice President of the Managed Assets Group at the Banc of California, testified about the loan process and the materiality of Manafort's false statements. See Trial Tr. at 1958-88.

<sup>14</sup>Plea Agreement, United States v. Manafort, 1:17-cr-201 (ABJ) (D.D.C. Sept.14, 2018), Doc 422 ("D.C. Plea Agreement"); Statement of the Offenses and Other Acts, United States v. Manafort, 1:17-cr-201 (ABJ) (D.D.C. Sept.14, 2018), Doc 423 ("D.C. Statement of the Offense") (collectively attached as Exhibit D).

<sup>15</sup>With respect to the Citizens Bank Union Street loan, Manafort made, or caused to be made, the following misrepresentations: (a) he caused to be submitted a false 2016 DMP Profit and Loss Statement; and (b) he falsely claimed the Peranova loan was forgiven and made false statements about his income. See Trial Tr. at 2418-21 (government summation identifying false statements relating to Counts 28 Citizens Bank Union Street loan conspiracy). Taryn Rodriguez from Citizens Bank testified about the loans process, see Trial Tr. at 1906-37, LaPorta testified about the Peranova loan issues, see id., at 947-59, as did Gates, see id. at 1326-30, and Washkuhn testified about the false DMP Profit and Loss Statement comparing it to the original she prepared, see id. at 631-32. With respect to The Federal Savings Bank loans, Manafort made, or caused to be made, the following misrepresentations as to both loans: (a) he caused to be submitted a false 2015 DMP Profit and Loss Statement; (b) he caused to be submitted a false 2016 DMP Profit and Loss Statement; (c) he falsely claimed that the \$300,000 delinquency on his American Express Card resulted from lending that credit card to Rick Gates to buy New York Yankees tickets; and (d) he made false statements about his mortgage on the Howard Street property. See Trial Tr. at 2423-24 (government summation identifying false statements relating to the Counts 29, 30, 31 and 32 bank fraud/conspiracies relating to two loans from The Federal Savings Bank). Three bank witnesses testified about The Federal Savings Bank Loans: Dennis Raico, see Trial Tr. at 2008-77; James Brennan, id. at 2164-2199; and Andrew Chojnowski, see id. at 2129-43. Among other testimony, Washkuhn identified the various submitted DMP Profit and Loss Statements as false. See Trial Tr. at 620-32. Gates testified that he never sought to borrow Manafort's American Express card and that he did not incur the \$300,000 delinquency for Yankees tickets, but rather that those tickets were for Manafort. See Trial Tr. at 1352-54.

time of his application, the Union Street property was encumbered by a \$5.3 million dollar loan from Genesis Capital. Manafort failed to disclose this mortgage to Citizens Bank at the time of the Count 28 conspiracy, nor previously as part of the \$3.4 million Citizens Howard Street loan application (charged in Counts 24 and 25). Taryn Rodriguez from Citizens Bank testified to this fact, noting that she later found the loan on her own.<sup>16</sup> At trial, Manafort never disputed the existence of the Genesis Capital loan and in fact agreed to the underlying details in Government Exhibit 500, a stipulation between the parties relating to the Genesis Capital loan on Union Street property.

### III. Standards Governing Sentencing

The Fourth Circuit has held that a sentencing court must: “(1) properly calculate the [Sentencing] Guidelines range; (2) allow the parties to argue for the sentence they deem appropriate and determine whether the § 3553(a) factors support the sentence[s] requested by the parties; and (3) explain its reasons for selecting a sentence.” United States v. Simmons, 269 Fed. Appx. 272, 273 (4th Cir. 2008) (citing United States v. Pauley, 511 F.3d 468, 473 (4th Cir. 2007)). Although the Sentencing Guidelines are advisory, United States v. Booker, 543 U.S. 220, 246 (2005), “district courts must begin their analysis with the Guidelines and remain cognizant of them throughout the sentencing process.” Gall v. United States, 552 U.S. 38, 50 n. 6 (2007); see Rosales-Mireles v. United States, 138 S. Ct. 1897, 1904 (2018) (“[E]ven in an advisory capacity the Guidelines serve as ‘a meaningful benchmark’ in the initial determination of a sentence and ‘through the process of appellate review.’”) (citation omitted).

<sup>16</sup> See Trial Tr. at 1911-1917.

#### **IV. The Advisory Guidelines Range**

The government agrees with the Probation Department’s guidelines calculations in the PSR and addresses that analysis below together with the defendant’s challenges. See Defense Objections to the PSR (dated January 21, 2019).

##### **A. Tax and FBAR Guidelines (Group 1)**

##### **1. Section 2S1.3 is the Relevant Guideline Provision**

As noted in the PSR, the base offense level for the Group 1 tax and FBAR counts is level 6, pursuant to § 2S1.3(b)(2), with 22 levels added based on the value of the funds held—here, more than \$55 million, pursuant to § 2B1.1(b)(1)(L). See PSR ¶¶ 73-74.<sup>17</sup>

The defendant argues that the tax guidelines, and not § 2S1.3, is the appropriate starting point for the Group 1 FBAR and tax offenses, citing United States v. Kim, 1:17-cr-00248 (TSE/LMB) (E.D. Va. 2018). See Defense Objections to the PSR, at 1-2. As detailed in the PSR Addendum, the defendant’s arguments lack merit. See PSR Addendum, 52-53.

First, the Guidelines explicitly distinguish between the various reporting crimes at issue here (covered by § 2S1.3) and tax offenses (covered by Part T). For example, the commentary to § 2S1.3, under the title “Statutory Provisions,” explicitly lists 31 U.S.C. § 5313—the statute of which Manafort was convicted in Count 12. Further, § 2S1.3(c)(1) addresses a reporting violation committed for the purposes of evading taxes, and specifically calls for use of the tax guidelines only if the resulting offense level is greater than the one determined under § 2S1.3.<sup>18</sup>

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<sup>17</sup>The base offense level is 6 pursuant to § 2S1.3(b)(2) because the offense at issue is not enumerated in § 2S1.3(b)(1).

<sup>18</sup>Section 2S1.3(c)(1), entitled “Cross Reference,” reading as follows: “If the offense was committed for the purposes of violating the Internal Revenue laws, apply the most appropriate guideline from Chapter

That criterion is not satisfied here: “the resulting offense level” under Chapter 2T of the guidelines is less than the Chapter 2S calculation. See United States v. Hill, 171 Fed. Appx. 815, 821-22 (11th Cir. 2006) (“§ 2S1.3(c)(1) was not applicable because the offense level of 16 that would have resulted from the court’s application of U.S.S.G. § 2T1.1(a)(1), would have been less than 17—the offense level that resulted from the court’s application of § 2S1.3(a) & (b)(1)”) (footnote omitted).

Moreover, Manafort’s FBAR offense was not committed solely for allowing him to violate the tax laws. Rather, his use of and access to unreported overseas accounts also facilitated the money laundering and unregistered-foreign-agent (FARA) schemes to which he pled guilty in Count One of a superseding information in the District of Columbia.<sup>19</sup> Accordingly, the tax guidelines are not appropriate here, both because the tax guidelines are not higher, as required by § 2S1.3(c)(1), and because the gravamen of the crime here was not solely tax avoidance.

As part of his plea in the District of Columbia, Manafort pleaded guilty to a conspiracy to transfer funds from outside the United States to the United States with the intent to promote the felony FARA violations.<sup>20</sup> Manafort’s scheme involved more than \$6.5 million dollars in transfers from the very overseas accounts that Manafort failed to report on his tax returns and under the FBAR process.<sup>21</sup>

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Two, Part T (Offenses Involving Taxation) if the resulting offense level is greater than that determined above.”

<sup>19</sup>See D.C. Plea Agreement; D.C. Statement of the Offense ¶¶ 36-37.

<sup>20</sup>Id.

<sup>21</sup>Notably, in his objections to the PSR, the defendant falsely characterized his guilty plea in the District of Columbia as involving only a “general conspiracy to violate the Foreign Agents Registration Act,”

Finally, Manafort argues that the Part T guidelines are appropriate because they were used in older cases, such as United States v. Kim, *supra*, and thus should continue to be used to avoid unwarranted sentencing disparities for similar defendants. The government disagrees for two reasons. First, in late 2017, the Department of Justice's Tax Division clarified its interpretation as to the appropriate guidelines applicable to FBAR violations, and its current position is consistent with that of the Probation Office in this matter; and second, the facts at issue here differ from those of the Kim prosecution.

The Tax Division changed its position on the appropriate guideline provision in FBAR cases sometime in late 2017. Manafort was aware of the government's position prior to this trial, at the very least because the Special Counsel's Office made clear its view that the relevant guideline is § 2S1.3. Further, in Kim itself, the Tax Division and Probation Office took the position that the appropriate guideline was § 2S1.3. See Kim Plea Agreement, at 3-4 (attached as Government Exhibit E) ("The Government contends that the applicable Guideline in this matter should be U.S.S.G § 2S1.3(a)(2), § 2B1.1 and § 2S1.3(b)(2) because the defendant filed two false FBARs and a false U.S. Individual Income Tax Return, Form 1020, within a 12-month period. However, at the time that the defendant agreed to plead guilty, the Government consistently took the position with similarly situated defendants that the applicable Guideline was U.S.S.G. § 2T1.1 and § 2T1.4 due to the cross reference in § 2S1.3(c)(1). Therefore, in order to ensure that the defendant receives equitable treatment, and in accordance with Federal Rule of Criminal Procedure 11(c)(1)(B), the United States and the defendant will recommend to

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Def. Obj. to PSR, at 3, without any mention to the fact that his plea also included a money laundering conspiracy, among other offenses. See D.C. Plea Agreement; D.C. Statement of the Offense ¶¶ 36-37.

the Court that the following provisions of the Sentencing Guidelines apply: [the Tax Guidelines].”); Government Sentencing Brief, at 6 (attached as Government Exhibit F) (“The defendant pled guilty to the willful failure to file an FBAR, in violation of 31 U.S.C. Sections 5314 and 5322. The offense of conviction in this case falls under U.S.S.G. § 2S1.3. The Probation Office calculated the Guidelines range under U.S.S.G. § 2S1.3(a)(2)”).

Further, as noted, the circumstances of the Kim and Manafort prosecutions and the conduct at issue are easily distinguished. In Kim, the defendant entered into a negotiated plea agreement which involved his cooperation, and the plea was entered into pursuant to Rule 11(c)(1)(B). Manafort’s FBAR offenses, in contrast, served to facilitate his tax offenses and his FARA and money laundering offenses. Further, the Kim prosecution was part of a series of prosecutions involving the use of overseas accounts to hide tax offenses, and thus the concern over parity with similarly situated defendants prosecuted at the same time was at its height. Calculating Manafort’s advisory Guidelines range under § 2S1.3 for an FBAR offense, even if he is one of the first defendants to be sentenced in that manner, would not constitute disparate treatment because his conduct, and the circumstances at issue, were different than in Kim.

## **2. A Role Enhancement is Appropriate**

The PSR concluded that Manafort should receive a four-level role enhancement for the Group 1 offenses, pursuant § 3B1.1(a), on the basis that “the defendant was an organizer or leader of a criminal activity that was otherwise extensive.” PSR, ¶ 78. The relevant test is the number of persons involved in the offenses, whether they were witting or unwitting. See United States v. Harvey, 532 F.3d 326, 338 (4th Cir. 2008) (“The Application Note to U.S.S.G. § 3B1.1 explains that, in determining if a criminal activity is ‘otherwise extensive,’ all persons involved



during the course of the entire offense are to be considered, including outsiders who provided unwitting services and thus do not qualify as ‘participants.’”); United States v. Ellis, 951 F.2d 580, 585 (4th Cir. 1991) (role enhancement based on “otherwise extensive” prong based on “‘all persons involved during the course of the entire offense,’ even the ‘unknowing services of many outsiders’”).

Manafort’s criminal conduct meets this standard. Manafort controlled the money at issue, he recruited others to facilitate these crimes, and he claimed a larger share of the proceeds. Further, Manafort was plainly the leader. He involved numerous individuals who were both knowing and unknowing participants in the criminal scheme. These included Gates and Konstantin Kilimnik, Manafort’s tax preparers (Ayliff, LaPorta, Naji Lakkis, Dan Walters, and Conor O’Brien) and bookkeepers (Hesham Ali and Washkuhn), and others in Cyprus who were involved in originating and maintaining the defendant’s overseas accounts.<sup>22</sup> Under the factors set forth in the Guidelines application notes and applied by the Fourth Circuit, application of the leadership enhancement is warranted. See United States v. Jones, 495 F. App’x 371, 373 (4th Cir. 2012) (“In determining a defendant’s leadership and organizational role, sentencing courts must consider seven factors: [T]he exercise of decision making authority, the nature of participation in the commission of the offense, the recruitment of accomplices, the claimed right to a larger share of the fruits of the crime, the degree of participation in planning or organizing the offense, the nature and scope of the illegal activity, and the degree of control and authority

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<sup>22</sup>The corporate entity and bank account documents relating to the overseas accounts listed a variety of individuals associated with Dr. Kypros Chrysostomides firm’s, including Eleni Chrysostomides, Chrystalla Pitsilli Dekatris, Myrianthi Christou, Evelina Georgiades, and Georgoula Mavrides. See e.g., Government Exhibit 63 (chart of foreign entities); Government Exhibit 73B (chart listing bank accounts).

exercised over others. U.S.S.G. § 3B1.1, cmt. n.4.”).<sup>23</sup> Further, even to the extent that Gates profited from this scheme, including by stealing from Manafort, his profits from these crimes paled in comparison to Manafort’s gain.

## **B. Bank Fraud Guidelines (Group 2)**

### **1. The PSR Correctly Calculated the Fraud Loss**

The Probation Department assessed the fraud loss to be approximately \$6 million for the counts of conviction for bank fraud together with the relevant conduct. See PSR, at ¶ 87. Manafort contends that the assessed fraud loss is overstated because the Citizens Bank loan conspiracy relating to Union Street property charged in Count 28 never closed and, had it closed, Manafort speculates that he would have fully collateralized the loan, resulting in no loss. See Defense Objections to PSR, at 4. That argument ignores the trial evidence that the defendant did not intend the property he pledged as collateral to be used as such since he lied to the bank about the collateral, hiding the fact that the Union Street property had a mortgage. At trial, the government proved that the Union Street property Manafort now claims he would have pledged as part of the loan charged in Count 28 was encumbered by a \$5.3 million loan from Genesis

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<sup>23</sup>In arguing against the application of a role enhancement, Manafort relies principally on the Guidelines’ use of the phrase “criminal organization” and contends that role enhancements in § 3B1.1 are meant to be applied only “to leaders or managers of organizations that have a primary purpose of engaging in crime, such as foreign cartels that smuggle narcotics into the United States, or motorcycle gangs that unlawfully transport and distribute firearms.” Def. Obj. to PSR, at 5. Manafort cites no case law endorsing his “not-in-white-collar-cases” reading of § 3B1.1, which cannot be reconciled with Fourth Circuit decisions such as Ellis and Harvey, supra. The dog-track owner who bribed state legislators in Ellis, for example, may have done it for “the primary purpose of” helping his business, not “engaging in crime,” see Def. Obj. to PSR, at 5, yet the Fourth Circuit affirmed application of the leadership enhancement to his scheme. Ellis, 951 F.2d at 585; accord Harvey, 532 F.3d at 338 (defendant sentenced for honest-services fraud involving bribery in awarding Army contracts was assessed a role enhancement). The defendant’s argument, in short, lacks merit.

Capital at the time.<sup>24</sup> Previously, the defendant applied for a loan from Citizens Bank on the Howard Street property (Counts 24 & 25), and also failed to disclose the Genesis loan on the Union Street property, which was one of several misrepresentations charged in the indictment and proven at trial.<sup>25</sup>

Because Manafort concealed the Genesis loan and intended to continue to do so, he is not entitled to credit based on the happenstance that the bank, through its own due diligence, eventually discovered the Genesis loan. See United States v. Staples, 410 F.3d 484, 490-91 (8th Cir. 2005) (“We do not mean that the value of the collateral necessarily must be deducted from the intended loss; the defendant’s intent is the touchstone. For example, if a car were collateral in a fraudulent loan procurement case, and the defendant were to hide the car, then the court should not deduct the value of the collateral from the *intended loss* because under those circumstances the defendant intended the loss to encompass the value of the collateral.”) (emphasis added).

## **2. The Sophisticated Means Enhancement Is Appropriate**

The Probation Department assessed a two-level enhancement on the Group 2 offenses for the use of sophisticated means pursuant to USSG § 2B1.1(b)(10)(c). PSR ¶ 88. The defendant

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<sup>24</sup>See Government Exhibit 500 (Stipulation relating to Genesis Capital); Trial Tr. at 1911-17 (Taryn Rodriguez from Citizens Bank testified that Manafort did not list the mortgage from Genesis Capital for 377 Union Street, Brooklyn, New York on his application for the Union Street loan and that she later identified the mortgage during a records check); Government Exhibit 255 (377 Union Street Uniform Residential Loan Application).

<sup>25</sup>See Trial Tr. at 1743-44 (Melinda James (née Francis) from Citizens Bank testified that on Manafort’s Howard Street loan application, it indicated that there was no mortgage on the property at 377 Union Street, Brooklyn, New York); Government Exhibit 224 (email attaching schedule of Manafort’s real estate owned and reflecting there is no mortgage on Union Street property); Trial Tr. at 1284-85 (Rick Gates testified that he understood that Manafort had a mortgage on the property at 377 Union Street, Brooklyn, New York during the time of the loan application at Citizens Bank for the Howard Street property).

objects on the grounds that “there was nothing complex about simply lying to the banks,” and that the falsified documents were “simple or ham-handed.” See Defense Objections to PSR, at 4. Manafort is wrong; even if some of Manafort’s conduct may have been ham-handed not all of it was.

The Guidelines affords an enhancement when “the offense otherwise involved sophisticated means and the defendant intentionally engaged in or caused the conduct constituting sophisticated means,” U.S.S.G. § 2B1.1(b)(10)(c). Application Note 9 defines “sophisticated means” as:

especially complex or especially intricate offense conduct pertaining to the execution or concealment of an offense. For example, in a telemarketing scheme, locating the main office of the scheme in one jurisdiction but locating soliciting operations in another jurisdiction ordinarily indicates sophisticated means. Conduct such as hiding assets or transactions, or both, through the use of fictitious entities, corporate shells, or offshore financial accounts also ordinarily indicates sophisticated means.

*Id.* § 2B1.1 cmt. n. 9.

Here, the defendant’s conduct qualifies for the enhancement, as he routinely hid relevant transactions, falsified documentation, and made misrepresentations relating to an offshore transaction (and the existence of those assets). For example, for the two Citizens Bank loans, Manafort hid the true nature of his foreign Peranova “loan”. Manafort had first claimed the \$1.5 million from Peranova, an offshore entity that he controlled, as a “loan” on his tax returns (to avoid paying taxes on the money), and when the bank needed to see less debt and more income for 2015, Manafort claimed the loan was forgiven, created a back-dated letter purporting to document the forgiveness, and instructed his tax preparer to forward that letter to the bank.<sup>26</sup>

<sup>26</sup>See Trial Tr. at 944-69 (Testimony of Cindy LaPorta).

Further, for four of the five loans, Manafort materially misstated the Profit and Loss Statement from his business for the years 2015 and 2016, hiding his true income, requested those documents from his bookkeeper, altered them, and then submitted them to the bank.<sup>27</sup>

With respect to the Citizens Bank loan charged in Count 24, Manafort hid the mortgage on the Union Street property, and went to great lengths to do so including having Gates contact the mortgage broker (Donna Duggan) and having her forward an older version of the mortgage binder for the property.<sup>28</sup> On the Banc of California fraud charged in Counts 27 and 28, Manafort hid the Howard Street mortgage. For The Federal Savings Bank loans charged in Counts 29 through 32, Manafort hid outstanding American Express debt and delinquency, falsely claiming that debt to be a loan to Gates and sending a letter to that effect to the bank. See United States v. Davis, No. 18-4080, 2018 WL 5096070, at \*1 (4th Cir. Oct. 18, 2018) (unpublished) (affirming application of the sophisticated means enhancement applies where the defendant created a “multilayered scheme” and “used numerous means to conceal the fraud, including forgery, altering documentation, transferring money between accounts, and omitting property from certain accountings”).

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<sup>27</sup>See Trial Tr. at 601-30 (Testimony of Heather Washkuhn).

<sup>28</sup>See Trial Tr. at 1284-86 (Gates testified that at Manafort’s direction he contacted Manafort’s insurance broker and requested an old copy of the insurance binder with respect to the Union Street property, which did not reflect the current mortgage, and that he was aware that the older version was then sent to the bank to hide the fact that there was currently a mortgage on the Union Street property).

### 3. A Role Enhancement is Appropriate For the Group 2 Crimes

The Group 2 criminal conduct involved multiple parties, individuals who were both knowing and unknowing with respect to the scheme, including co-conspirators Gates and Jeffrey Yohai, and more than a dozen bankers, accountants, and Manafort's bookkeepers and tax preparers.<sup>29</sup> Manafort, moreover, was the primary beneficiary of the frauds. Based on the criteria in the application note and the case law cited above, the role enhancement is equally appropriate for the Group 2 bank fraud offenses.

#### C. The Defendant Did Not Accept Responsibility

Finally, the PSR properly denied Manafort any reduction for acceptance of responsibility pursuant to § 3E1.1. PSR ¶ 96. Manafort proceeded to trial and vigorously denied his guilt. Although a trial alone does not necessarily preclude an acceptance reduction, it almost always does in circumstances like those here. Application Note 2 to § 3E1.1 suggests that the situations where a defendant proceeds to trial and qualifies for an acceptance reduction are rare, and are often limited to circumstances where the defendant proceeds to trial to challenge the constitutionality of a statute, or some other legal issue, and not the facts. See § 3E1.1, Application Note 2. That was not the case here. See e.g., United States v. Redding, 422 F. App'x 192, 195 (4th Cir. 2011) (unpublished) ("Because Redding put the government to its burden of proof and went to trial challenging his factual guilt, the district court was correct in finding the two-level reduction was inappropriate."). Manafort cites no authority for the

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<sup>29</sup>For example, from Citizens Bank at least the following individuals were involved: David Fallarino, Melinda James (née Francis), Taryn Rodriguez, and Peggy Miceli; from the Banc of California, Perris Kaufman and Gary Seferian; and from The Federal Savings Bank: Anna Ivakhnik, Dennis Raico, Thomas Horn, James Brennan, and Steve Calk; from Nigro Karlin (the bookkeeper): Heather Washkuhn; and from KWC: Cindy LaPorta and Philip Ayliff.

proposition that a later plea in another prosecution—even one involving some of the same facts—negates the fact that he put the government to its proof in the Eastern District of Virginia.

Further, the defendant has now conceded that he breached his plea agreement in the District of Columbia, and on February 13, 2019, in a ruling from the bench, Judge Jackson found by a preponderance of the evidence that Manafort intentionally lied to the government as to three subject areas, and had not with respect to two others. The DC Court also issued an order documenting those findings. United States v. Manafort, 1:17-cr-201 (ABJ) (D.D.C. February 13, 2019), Doc 509 (attached as Exhibit G).

Finally, the defendant's failure to file the required financial information with the Probation Department, in either district, is further evidence of his failure to accept responsibility, particularly here, where the defendant was convicted of financial crimes, including hiding his income and assets.

**V. Statutory Sentencing Factors Pursuant To Title 18, United States Code, Section 3553(a)**

The government addresses the Section 3553(a) factors below.

**A. The Nature and Circumstances of the Offense**

Manafort's criminal conduct was serious, longstanding, and bold. He failed to pay taxes in five successive years involving more than \$16 million in unreported income—and failed to identify his overseas accounts in those same returns—resulting in more than \$6 million in unpaid taxes. In four successive years from 2011 to 2014, Manafort failed to report his overseas accounts to the Treasury Department, and over that period he maintained 31 accounts in three



foreign countries collectively holding more than \$55 million in multiple currencies.<sup>30</sup> As for his bank fraud offenses, Manafort defrauded not one financial institution but three, and sought five loans from those banks, seeking more than \$25 million.

Tax fraud is a serious crime and violates the most basic covenant between citizens and the government. See United States v. Zukerman, 897 F.3d 423, 428 (2d Cir. 2018) (“[t]ax crimes represent an especially damaging category of criminal offense” which “strike[] at the foundation of a functioning government”) (citation omitted), pet. for cert. filed, No. 18-642 (Nov. 19, 2018). The defendant benefited from the protections and privileges of the law and the services of his government, while cheating it and his fellow citizens. See United State v. Trupin, 475 F.3d 71, 76 (2d Cir. 2007) (tax evader effectively “[steals] from his fellow taxpayers through his deceptions.”).

The defendant’s failure to file foreign bank account reports is also significant. FBAR regulations facilitate the identification of “persons who may be using foreign financial accounts to circumvent United States law,” whether those funds are used for “illicit purposes or to identify income maintained or generated abroad.” See IRS FBAR Reference Guide, at 2 (<https://www.irs.gov/pub/irs-utl/irsfbarreferenceguide.pdf>). Here, Manafort’s FBAR offenses were more serious than that of a defendant who simply hides his income, like the defendant in Kim. Manafort used his foreign accounts not only to hide his income, but to launder funds, including by engaging in transactions that promoted his FARA scheme.

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<sup>30</sup>See Government Exhibit 73B (FBAR Chart for 2011), Government Exhibit 73C (FBAR Chart for 2012), Government Exhibit 73D (FBAR Chart for 2013), Government Exhibit 73E (FBAR Chart for 2014); Government Exhibit 74 (“Deposit Analysis – Foreign Source of Funds Received by Foreign Accounts,” listing total as \$65,860,502.50).

Finally, the defendant’s bank fraud offenses are also serious, both for the number and amount of the loans and the conduct involved. Bank fraud undermines the stability of our financial system and the federally insured financial institutions that citizens rely upon that those statutes seek to protect. See United States v. Koh, 199 F.3d 632, 638 (2d Cir. 1999) (recognizing that Congress, in part through passage of the bank fraud statute, “clearly intended to protect ‘the financial integrity’ of institutions in which it had a strong federal interest, including those that are ‘federally created, controlled or insured’”) (quoting S. Rep. No. 98–225, at 377 (1983)).

Manafort sought five loans totaling more than \$25 million and secured funding in the amount of more than \$19 million. Those facts set him far afield from the ordinary bank fraud defendant.

As noted, these were not short-lived schemes. Manafort's crimes were the product of his planning and premeditation over many years, and a result of his direct and willful conduct. Manafort's tax crimes by any account were serious, and more serious than most given the amount of money at issue and the fact that his failure to pay the taxes owed was not caused by any necessity but simple greed. Manafort had ample funds to cover these tax payments. He simply chose not to comply with laws that would reduce his wealth. And along the way, each year, in order to successfully implement the tax scheme the defendant involved numerous other people, including both witting and unwitting participants. In every scheme, Manafort was always the principal, and almost always the exclusive beneficiary.

## B. History and Characteristics of the Defendant

Manafort's history and characteristics are aggravating factors. Manafort has had every opportunity to succeed. He is well educated and a member of the legal profession, attending

Georgetown University for college and law school. He was a successful political consultant both in the United States and abroad.<sup>31</sup>

Further, while the defendant is 69 years old and has suffered reputational harm as a result of his conviction, neither is a mitigating factor. Part H of Chapter 5 of the Sentencing Guidelines addresses age, and in effect provides that age can be considered “individually or in combination with other offender characteristics,” when “present to an unusual degree and distinguish the case from the typical cases covered by the guidelines.” U.S.S.G. § 5H1.1. Nothing about the defendant’s age is unusual. Tax offenders are often older and often, like the defendant, wealthy, but they nonetheless receive substantial terms of incarceration notwithstanding age and health issues. *See, e.g., United States v. Dibbi*, 413 Fed. Appx 618, 620 (4th Cir. 2011) (affirming sentence of 30 months for tax fraud and decision not to grant a downward variance based on the defendant’s health and age); *United States v. Gilmartin*, 12-cr-287 (MGC) (SDNY) (defendant, age 70, sentenced to 48 months imprisonment for evading taxes and failing to file federal and state tax returns for over 20 years, where the tax loss was approximately \$1.7 million).<sup>32</sup>

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<sup>31</sup>See Trial Tr. at 2436 (defense closing argument citing witness testimony of Tad Devine and Dan Rabin describing Manafort as a talented political consultant and citing documents detailing Manafort’s work for the presidential campaigns of Gerald Ford, Ronald Reagan, George H. W. Bush, Bob Dole, and Donald Trump); *see* Trial Tr. at 1133-34 (Rick Gates testified that Manafort was “probably one of the most, you know, politically brilliant strategists I’ve ever worked with.”).

<sup>32</sup>See also *United States v. Jackson*, 10-cr-298 (CM) (SDNY) (defendant, age 57, sentenced to 63 months imprisonment for his work as a tax preparer who used a variety of deceptive practices—including claiming deceased children as dependents—as part of a scheme to prepare false tax returns and where the tax loss was approximately \$1 million); *United States v. Catlett*, 10-CR-101 (D. Md) (defendant, age 64, sentenced to 210 months imprisonment, related to filing 275 fraudulent tax returns reporting over \$22 million in false Schedule E losses, resulting in a federal tax loss of \$3.8 million).

Manafort's age does not eliminate the risk of recidivism he poses—particularly given that his pattern of criminal activity has occurred over more than a decade and that the most recent crimes he pled guilty to occurred from February to April 2018, when he conspired to tamper with witnesses at a time when he was under indictment in two separate districts. Further as Judge Jackson found, Manafort's misconduct continued as recently as October 2018 when he repeatedly and intentionally lied to the government during proffer sessions and the grand jury.

Courts also have rejected the premise that the reputational harm incident to every criminal conviction is a valid basis for reducing the term of imprisonment imposed on a white-collar offender such as Manafort. Nothing about that harm, or the collateral consequences that Manafort faces, was unforeseeable at the time that he chose to engage in the charged conduct. Manafort chose to commit multiple bank frauds, even when the subject of national attention in 2016. *See, e.g., United States v. Prosperi*, 686 F.3d 32, 47 (1st Cir. 2012) ("It is impermissible for a court to impose a lighter sentence on a white-collar defendant than on blue-collar defendants because it reasons that white-collar defendants suffer greater reputational harm or have more to lose by conviction.").

**C. The Need to Promote Respect for the Law and to Afford  
Adequate Deterrence to Criminal Conduct**

The sentence should serve to promote respect for the law and to afford both adequate specific and general deterrence as intended by Congress. With respect to general deterrence, the sentence should send a clear message that repeated choices to commit serious economic crimes have serious consequences, particularly in a matter that received national attention.

The Fourth Circuit has stressed the heightened importance of general deterrence in tax cases, and in particular the need for incarceration, given the prevalence of tax offenses and the

comparatively few prosecutions. See United States v. Engle, 592 F.3d 495, 502 (4th Cir. 2010) (“Given the nature and number of tax evasion offenses as compared to the relatively infrequent prosecution of those offenses, we believe that the [Sentencing] Commission’s focus on incarceration as a means of third-party deterrence is wise. The vast majority of such crimes go unpunished, if not undetected. Without a real possibility of imprisonment, there would be little incentive for a wavering would-be evader to choose the straight-and-narrow over the wayward path.”). Courts have recognized that tax prosecutions are difficult and time consuming to investigate and prosecute, and require substantial resources. See Zukerman, 897 F.3d at 429 (general deterrence has an important role in tax cases “due to the significant resources required to monitor and prosecute tax cases,” which cost the government hundreds of billions of dollars annually) (internal quotation marks omitted); see also U.S.S.G Ch. 2, Part T, intro. cmt. (explaining that, in light of “the limited number of criminal tax prosecutions relative to the estimated incidence of such violations, deterring others from violating the tax laws is a primary consideration underlying these guidelines,” and that “[r]ecognition that the sentence for a criminal tax case will be commensurate with the gravity of the offense should act as a deterrent to would-be violators”).

Tax evasion through the use of offshore entities and bank accounts is among the most lucrative offenses and often the most difficult to investigate, which increases the need for strong deterrence and a meaningful sentence. See United States v. Hefferman, 43 F.3d 1144, 1149 (7th Cir. 1994) (“Considerations of (general) deterrence argue for punishing more heavily those offenses that either are lucrative or are difficult to detect and punish, since both attributes go to increase the expected benefits of a crime and hence the punishment required to deter it.”). Bank

fraud, while more common, is equally serious and the need for deterrence is also strong in light of the need to protect the integrity of the nation's banking system.

#### **D. The Need to Avoid Unwarranted Sentencing Disparities**

Section 3553(a) also requires a sentence that is generally consistent with others imposed on similar offenders for similar offenses; courts are instructed “to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct.” 18 U.S.C. § 3553(a)(6). First, in this case, there are no similarly situated charged defendants, as Manafort’s co-defendant, Gates, was subservient to Manafort, and he accepted responsibility, pled guilty, and cooperated early in this investigation. The crimes at issue involved Manafort’s taxes and overseas accounts, not Gates’. With respect to the bank loans, Manafort, not Gates, principally received the proceeds. Second, given the breadth of Manafort’s criminal activity, the government has not located a comparable case with the unique array of crimes and aggravating factors.

## VI. Conclusion

For a decade, Manafort repeatedly violated the law. Considering only the crimes charged in this district, they make plain that Manafort chose to engage in a sophisticated scheme to hide millions of dollars from United States authorities. And when his foreign income stream dissipated in 2015, he chose to engage in a series of bank frauds in the United States to maintain his extravagant lifestyle, at the expense of various financial institutions. Manafort chose to do this for no other reason than greed, evidencing his belief that the law does not apply to him. Manafort solicited numerous professionals and others to reap his ill-gotten gains. The sentence

in this case must take into account the gravity of this conduct, and serve to both specifically deter Manafort and those who would commit a similar series of crimes.

Dated: February 15, 2018

Uzo Asonye  
Assistant United States Attorney  
Eastern District of Virginia

/s/

Andrew Weissmann  
Greg D. Andres  
Brandon L. Van Grack  
Senior Assistant Special Counsels  
Special Counsel's Office  
U.S. Department of Justice  
950 Pennsylvania Avenue NW  
Washington, D.C. 20530  
Telephone: (202) 616-0800  
*Attorneys for United States of America*



# EXHIBIT A

Vendor Name	2010	2011	2012	2013	2014	Total
SP&C Home Improvement Inc.	\$ 626,760	\$ 716,200	\$ 1,015,960	\$ 1,099,000	\$ 90,953	\$ 3,548,873
Big Picture Solutions, Inc.		\$ 102,006	\$ 456,800	\$ 939,475	\$ 162,920	\$ 1,661,201
Alan Couture	\$ 103,000	\$ 191,800	\$ 137,850	\$ 230,700	\$ 85,115	\$ 748,465
Scott L. Wilson Landscape & Tree Specialists, Inc.	\$ 237,700	\$ 265,800				\$ 503,500
Aegis Holdings LLC				\$ 500,000		\$ 500,000
J&J Oriental Rug Gallery	\$ 390,000		\$ 100,000			\$ 490,000
Sabatello Construction of Florida, Inc.		\$ 39,237	\$ 362,950	\$ 30,300		\$ 432,487
House of Bijan	\$ 213,280	\$ 112,000	\$ 7,500			\$ 332,780
New Leaf Landscape Maintenance LLC		\$ 4,115	\$ 134,600	\$ 26,025	\$ 90,945	\$ 255,685
Don Beyer Motors, Inc. aka Land Rover of Alexandria			\$ 163,705			\$ 163,705
Federal Stone and Brick LLC			\$ 87,000	\$ 38,650		\$ 125,650
American Service Center Associates of Alexandria, LLC aka Mercedes-Benz of Alexandria			\$ 62,750			\$ 62,750
Sensoryphile, Inc.	\$ 46,450					\$ 46,450
<b>Total</b>	<b>\$ 1,617,190</b>	<b>\$ 1,431,158</b>	<b>\$ 2,529,115</b>	<b>\$ 2,864,150</b>	<b>\$ 429,933</b>	<b>\$ 8,871,546</b>

Purchase of Property	2010	2011	2012	2013	2014	Total
Howard Street Condominium			\$ 1,500,000			
Arlington House			\$ 1,900,000			
Union Street Brownstone			\$ 3,299,500			
<b>Total</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 6,699,500</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 6,699,500</b>

<b>Grand Total</b>	<b>\$ 1,617,190</b>	<b>\$ 1,431,158</b>	<b>\$ 9,228,615</b>	<b>\$ 2,864,150</b>	<b>\$ 429,933</b>	<b>\$ 15,571,046</b>
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# EXHIBIT B

**Paul Manafort**  
**Summary of Personal Tax Return Items and Unreported Income**  
**Tax Years 2010 to 2014**

<b>Tax Year</b>	<b>Approx. Filing Date</b>	<b>Foreign Account Reported (Sch. B, Line 7a)</b>	<b>Total Income Reported (Line 22)</b>	<b>Total Unreported Income</b>
2010	October 14, 2011	None	\$504,744	\$1,617,190
2011	October 15, 2012	None	\$3,071,409	\$1,431,158
2012	October 7, 2013	None	\$5,361,007	\$9,228,615
2013	October 6, 2014	None	\$1,910,928	\$2,864,150
2014	October 14, 2015	None	\$2,984,210	\$1,329,933



# EXHIBIT C

# AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2011

Item	Account Name, Financial Institution and Account Number	Maximum Account Value	Beneficial Owner Listed on Bank Account Application	Authorized Signers Listed on Bank Account Application
1	<b>Black Sea View Limited</b> Bank of Cyprus [REDACTED]	\$ 1,025,100.00	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
2	<b>Black Sea View Limited*</b> Bank of Cyprus [REDACTED]	\$ 133.81	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
3	<b>Global Highway Limited</b> Bank of Cyprus [REDACTED]	\$ 684,568.70	Richard Gates Konstantin Kilimnik (As of 1/15/08)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
4	<b>Leviathan Advisors Limited</b> Bank of Cyprus [REDACTED]	\$ 124,516.30	Richard Gates Konstantin Kilimnik (As of 1/15/08)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
5	<b>Leviathan Advisors Limited*</b> Bank of Cyprus [REDACTED]	\$ 1,582,790.00	Richard Gates Konstantin Kilimnik (As of 1/15/08)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
6	<b>LOAV Advisors Limited</b> Bank of Cyprus [REDACTED]	\$ 20,346.93	Richard Gates Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou



\*The maximum account value was converted from Euro to USD on the date of occurrence per the bank statement using the website <https://www.oanda.com/currency/converter/>.

# AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2011

Item	Account Name, Financial Institution and Account Number	Maximum Account Value	Beneficial Owner Listed on Bank Account Application	Authorized Signers Listed on Bank Account Application
7	<b>Peranova Holdings Limited</b> Bank of Cyprus [REDACTED]	\$ 4,436,680.04	Richard Gates Konstantin Kilimnik (As of 1/15/08)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
8	<b>Peranova Holdings Limited*</b> Bank of Cyprus [REDACTED]	\$ 23.84	Richard Gates Konstantin Kilimnik (As of 1/15/08)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
9	<b>Serangon Holdings Limited</b> Bank of Cyprus [REDACTED]	\$ 2,831.57	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
10	<b>Yiakora Ventures Limited</b> Bank of Cyprus [REDACTED]	\$ 504,807.56	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
<b>AGGREGATE MAXIMUM VALUE: \$ 8,381,798.75</b>				

\*The maximum account value was converted from Euro to USD on the date of occurrence per the bank statement using the website <https://www.oanda.com/currency/converter/>.



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**AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2012**

<b>Item</b>	<b>Account Name, Financial Institution and Account Number</b>	<b>Maximum Account Value</b>	<b>Beneficial Owner Listed on Bank Account Application</b>	<b>Authorized Signers Listed on Bank Account Application</b>
1	<b>Actinet Trading Limited</b> Bank of Cyprus [REDACTED]	\$ 999,987.00	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Paul Manafort Richard Gates  Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
2	<b>Actinet Trading Limited*</b> Bank of Cyprus [REDACTED]	\$ 3,416,880.00	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Paul Manafort Richard Gates  Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
3	<b>Black Sea View Limited</b> Bank of Cyprus [REDACTED]	\$ 2,519,316.94	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
4	<b>Black Sea View Limited*</b> Bank of Cyprus [REDACTED]	\$ 1,927,720.00	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou



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# AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2012

Item	Account Name, Financial Institution and Account Number	Maximum Account Value	Beneficial Owner Listed on Bank Account Application	Authorized Signers Listed on Bank Account Application
5	<b>Bletilla Ventures Limited</b> Bank of Cyprus [REDACTED]	\$ 5,000,000.00	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
6	<b>Bletilla Ventures Limited*</b> Bank of Cyprus [REDACTED]	\$ 1,849,860.00	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
7	<b>Global Highway Limited</b> Bank of Cyprus [REDACTED]	\$ 531,852.76	Richard Gates Konstantin Kilimnik (As of 1/15/08)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
8	<b>Leviathan Advisors Limited</b> Bank of Cyprus [REDACTED]	\$ 738.45	Richard Gates Konstantin Kilimnik (As of 1/15/08)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
9	<b>Leviathan Advisors Limited*</b> Bank of Cyprus [REDACTED]	\$ 66,053.30	Richard Gates Konstantin Kilimnik (As of 1/15/08)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
10	<b>LOAV Advisors Limited</b> Bank of Cyprus [REDACTED]	\$ 5,679.02	Richard Gates Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou

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# AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2012

Item	Account Name, Financial Institution and Account Number	Maximum Account Value	Beneficial Owner Listed on Bank Account Application	Authorized Signers Listed on Bank Account Application
11	<b>Lucicle Consultants Limited</b> Bank of Cyprus [REDACTED]	\$ 1,530,903.16	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Paul Manafort Richard Gates  Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
12	<b>Lucicle Consultants Limited*</b> Bank of Cyprus [REDACTED]	\$ 4,183,590.00	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Paul Manafort Richard Gates  Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
13	<b>Olivenia Trading Limited*</b> Bank of Cyprus [REDACTED]	\$ 3.28	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
14	<b>Olivenia Trading Limited</b> Bank of Cyprus [REDACTED]	\$ 740,362.98	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides

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**AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2012**

<b>Item</b>	<b>Account Name, Financial Institution and Account Number</b>	<b>Maximum Account Value</b>	<b>Beneficial Owner Listed on Bank Account Application</b>	<b>Authorized Signers Listed on Bank Account Application</b>
15	<b>Peranova Holdings Limited</b> Bank of Cyprus [REDACTED]	\$ 2,926,680.04	Richard Gates Konstantin Kilimnik (As of 1/15/08)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
16	<b>Peranova Holdings Limited*</b> Bank of Cyprus [REDACTED]	\$ 13.08	Richard Gates Konstantin Kilimnik (As of 1/15/08)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
17	<b>Serangon Holdings Limited</b> Bank of Cyprus [REDACTED]	\$ 2,379.44	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
18	<b>Yiakora Ventures Limited</b> Bank of Cyprus [REDACTED]	\$ 2,650.27	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou
<b>AGGREGATE MAXIMUM VALUE: \$ 25,704,669.72</b>				

\*The maximum account value was converted from Euro to USD on the date of occurrence per the bank statement using the website <https://www.oanda.com/currency/converter/>.

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**AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2013**

Item	Account Name, Financial Institution and Account Number	Maximum Account Value	Beneficial Owner Listed on Bank Account Application	Authorized Signers Listed on Bank Account Application
1	<b>Actinet Trading Limited</b> Bank of Cyprus [REDACTED]	\$ 87,728.03	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Paul Manafort Richard Gates  Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
2	<b>Actinet Trading Limited*</b> Bank of Cyprus [REDACTED]	\$ 196,511.00	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Paul Manafort Richard Gates  Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
3	<b>Actinet Trading Limited</b> Hellenic Bank [REDACTED]	\$ 87,458.48	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
4	<b>Actinet Trading Limited*</b> Hellenic Bank [REDACTED]	\$ 202,277.00	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides



\*The maximum account value was converted from Euro and GBP to USD on the date of occurrence per the bank statement using the website <https://www.oanda.com/currency/converter/>.

# AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2013

Item	Account Name, Financial Institution and Account Number	Maximum Account Value	Beneficial Owner Listed on Bank Account Application	Authorized Signers Listed on Bank Account Application
5	<b>Bletilla Ventures Limited</b> Bank of Cyprus [REDACTED]	\$ 1,568,530.54	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
6	<b>Bletilla Ventures Limited*</b> Bank of Cyprus [REDACTED]	\$ 276,703.00	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
7	<b>Bletilla Ventures Limited</b> Hellenic Bank [REDACTED]	\$ 833,349.39	Richard Gates Konstantin Kilimnik	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
8	<b>Bletilla Ventures Limited*</b> Hellenic Bank [REDACTED]	\$ 278,614.00	Richard Gates Konstantin Kilimnik	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
9	<b>LOAV Advisors Limited</b> Bank of Cyprus [REDACTED]	\$ 5,292.42	Richard Gates Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou

\*The maximum account value was converted from Euro and GBP to USD on the date of occurrence per the bank statement using the website <https://www.oanda.com/currency/converter/>.

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**AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2013**

Item	Account Name, Financial Institution and Account Number	Maximum Account Value	Beneficial Owner Listed on Bank Account Application	Authorized Signers Listed on Bank Account Application
10	<b>Lucicle Consultants Limited</b> Bank of Cyprus [REDACTED]	\$ 167,664.80	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Paul Manafort Richard Gates  Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
11	<b>Lucicle Consultants Limited*</b> Bank of Cyprus [REDACTED]	\$ 288,410.00	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Paul Manafort Richard Gates  Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
12	<b>Lucicle Consultants Limited</b> Hellenic Bank [REDACTED]	\$ 603,131.79	Richard Gates	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
13	<b>Lucicle Consultants Limited*</b> Hellenic Bank [REDACTED]	\$ 1,427,810.00	Richard Gates	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides

\*The maximum account value was converted from Euro and GBP to USD on the date of occurrence per the bank statement using the website <https://www.oanda.com/currency/converter/>.



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## AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2013

Item	Account Name, Financial Institution and Account Number	Maximum Account Value	Beneficial Owner Listed on Bank Account Application	Authorized Signers Listed on Bank Account Application
14	<b>Marziola Holdings Limited</b> Hellenic Bank [REDACTED]	\$ 2,000,000.00	Konstantin Kilimnik	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
15	<b>Olivenia Trading Limited*</b> Bank of Cyprus [REDACTED]	\$ 0.64	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
16	<b>Olivenia Trading Limited</b> Bank of Cyprus [REDACTED]	\$ 601,794.98	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
17	<b>Olivenia Trading Limited</b> Hellenic Bank [REDACTED]	\$ 601,079.22	Richard Gates Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Myrianthi Christou Evelina Georgiades Georgoula Mavrides
18	<b>Yiakora Ventures Limited</b> Bank of Cyprus [REDACTED]	\$ 11,943.28	Paul Manafort Konstantin Kilimnik (As of 1/21/13)	Eleni Chrysostomides Chrystalla Pitsilli Dekatris Georgoula Mavrides Myrianthi Christou

\*The maximum account value was converted from Euro and GBP to USD on the date of occurrence per the bank statement using the website <https://www.oanda.com/currency/converter/>.

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**AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2013**

Item	Account Name, Financial Institution and Account Number	Maximum Account Value	Beneficial Owner Listed on Bank Account Application	Authorized Signers Listed on Bank Account Application
19	<b>Pompolo Limited*</b> HSBC UK [REDACTED]	\$ 1,838,260.00		Richard Gates
20	<b>Global Endeavour Inc.</b> Loyal Bank Ltd. [REDACTED]	\$ 2,999,950.00	Konstantin Kilimnik	Myrianthi Christou Chrystalla Dekatris Eleni Chrysostomides Georgoula Mavrides Evelina Georgiades
21	<b>Global Endeavour Inc.*</b> Loyal Bank Ltd. [REDACTED]	\$ 2,036,960.00	Konstantin Kilimnik	Myrianthi Christou Chrystalla Dekatris Eleni Chrysostomides Georgoula Mavrides Evelina Georgiades
22	<b>Jeunet Ltd.*</b> Loyal Bank Ltd [REDACTED]	\$ 2,675,340.00	Konstantin Kilimnik	Myrianthi Christou Chrystalla Dekatris Eleni Chrysostomides Georgoula Mavrides Evelina Georgiades
<b>AGGREGATE MAXIMUM VALUE: \$ 18,788,808.57</b>				

\*The maximum account value was converted from Euro and GBP to USD on the date of occurrence per the bank statement using the website <https://www.oanda.com/currency/converter/>.

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 AGGREGATE MAXIMUM VALUE OF FOREIGN BANK ACCOUNTS IN 2014

Item	Account Name, Financial Institution and Account Number	Maximum Account Value	Beneficial Owner Listed on Bank Account Application	Authorized Signers Listed on Bank Account Application
1	<b>Global Endeavour Inc.</b> Loyal Bank Ltd. [REDACTED]	\$ 259,797.56	Konstantin Kilimnik	Myrianthi Christou Chrystalla Dekatris Eleni Chrysostomides Georgoula Mavrides Evelina Georgiades
2	<b>Global Endeavour Inc.*</b> Loyal Bank Ltd. [REDACTED]	\$ 1,622,660.00	Konstantin Kilimnik	Myrianthi Christou Chrystalla Dekatris Eleni Chrysostomides Georgoula Mavrides Evelina Georgiades
3	<b>Jeunet Ltd.*</b> Loyal Bank Ltd. [REDACTED]	\$ 860,846.00	Konstantin Kilimnik	Myrianthi Christou Chrystalla Dekatris Eleni Chrysostomides Georgoula Mavrides Evelina Georgiades
<b>AGGREGATE MAXIMUM VALUE: \$ 2,743,303.56</b>				



\*The maximum account value was converted from Euro to USD on the date of occurrence per the bank statement using the website <https://www.oanda.com/currency/converter/>.

## EXHIBIT D



**U.S. Department of Justice**  
*The Special Counsel's Office*

Washington, D.C. 20530

September 13, 2018

Kevin M. Downing, Esq.  
Law Office of Kevin M. Downing  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001

Thomas E. Zehnle, Esq.  
Law Office of Thomas E. Zehnle  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001

Richard W. Westling, Esq.  
Epstein Becker Green  
1227 25<sup>th</sup> Street NW  
Suite 700  
Washington, DC 20037

**FILED**

**SEP 14 2018**

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

Re: United States v. Paul J. Manafort, Jr., Crim. No. 17-201-<sup>1</sup> (ABJ)

Dear Counsel:

This letter sets forth the full and complete plea offer to your client Paul J. Manafort, Jr. (hereinafter referred to as “your client” or “defendant”) from the Special Counsel’s Office (hereinafter also referred to as “the Government” or “this Office”). If your client accepts the terms and conditions of this offer, please have your client execute this document in the space provided below. Upon receipt of the executed document, this letter will become the Plea Agreement (hereinafter referred to as the “Agreement”). The terms of the offer are as follows.

**1. Charges and Statutory Penalties**

Your client agrees to plead guilty in the above-captioned case to all elements of all objects of all the charges in a Superseding Criminal Information, which will encompass the charges in Counts One and Two of a Superseding Criminal Information, charging your client with:

- A. conspiracy against the United States, in violation of 18 U.S.C. § 371 (which includes a conspiracy to: (a) money launder (in violation of 18 U.S.C. § 1956); (b) commit tax fraud

(in violation of 26 U.S.C. § 7206(1)); (c) fail to file Foreign Bank Account Reports (in violation of 31 U.S.C. §§ 5314 and 5322(b)); (d) violate the Foreign Agents Registration Act (in violation of 22 U.S.C. §§ 612, 618(a)(1), and 618(a)(2)); and (e) to lie to the Department of Justice (in violation of 18 U.S.C. § 1001(a) and 22 U.S.C. §§ 612 and 618(a)(2)); and

- B. conspiracy against the United States, in violation of 18 U.S.C. § 371, to wit: conspiracy to obstruct justice by tampering with witnesses while on pre-trial release (in violation of 18 U.S.C. § 1512).

The defendant also agrees not to appeal any trial or pre-trial issue in the Eastern District of Virginia, or to challenge in the district court any such issue, and admits in the attached "Statement of the Offense" his guilt of the remaining counts against him in United States v. Paul J. Manafort, Jr., Crim. No. 1:18-cr-83 (TSE) (hereafter "Eastern District of Virginia.") A copy of the Superseding Criminal Information and Statement of the Offense are attached.

Your client understands that each violation of 18 U.S.C. § 371 carries a maximum sentence of 5 years' imprisonment; a fine of not more than \$250,000, pursuant to 18 U.S.C. § 3571(b)(3); a term of supervised release of not more than 3 years, pursuant to 18 U.S.C. § 3583(b)(2); and an obligation to pay any applicable interest or penalties on fines and restitution not timely made, and forfeiture.

In addition, your client agrees to pay a mandatory special assessment of \$200 to the Clerk of the United States District Court for the District of Columbia. Your client also understands that, pursuant to 18 U.S.C. § 3572 and § 5E1.2 of the United States Sentencing Guidelines, *Guidelines Manual* (2016) (hereinafter "Sentencing Guidelines," "Guidelines," or "U.S.S.G."), the Court may also impose a fine that is sufficient to pay the federal government the costs of any imprisonment, term of supervised release, and period of probation.

## **2. Factual Stipulations**

Your client agrees that the attached Statement of the Offense fairly and accurately describes and summarizes your client's actions and involvement in the offenses to which your client is pleading guilty, as well as crimes charged in the Eastern District of Virginia that remain outstanding, as well as additional acts taken by him. Please have your client sign and return the Statement of the Offense, along with this Agreement.

## **3. Additional Charges**

In consideration of your client's guilty plea to the above offenses, and upon the completion of full cooperation as described herein and fulfillment of all the other obligations herein, no additional criminal charges will be brought against the defendant for his heretofore disclosed participation in criminal activity, including money laundering, false statements, personal and corporate tax and FBAR offenses, bank fraud, Foreign Agents Registration Act violations for his work in Ukraine, and obstruction of justice. In addition, subject to the terms of this Agreement, at the time of sentence or at the completion of his successful cooperation, whichever is later, the Government will move to dismiss the remaining counts of the Indictment

in this matter and in the Eastern District of Virginia and your client waives venue as to such charges in the event he breaches this Agreement. Your client also waives all rights under the Speedy Trial act as to any outstanding charges.

#### 4. Sentencing Guidelines Analysis

Your client understands that the sentence in this case will be determined by the Court, pursuant to the factors set forth in 18 U.S.C. § 3553(a), including a consideration of the applicable guidelines and policies set forth in the Sentencing Guidelines. Pursuant to Federal Rule of Criminal Procedure 11(c)(1)(B), and to assist the Court in determining the appropriate sentence, the Office estimates the Guidelines as follows:

##### A. **Estimated Offense Level Under the Guidelines**

Base offense level	+8	2S1.1(a) Base Offense Level: (1) The offense level for the underlying offense from which the laundered funds were derived, if (A) the defendant committed the underlying offense (or would be accountable for the underlying offense under subsection (a)(1)(A) of §1B1.3 (Relevant Conduct)); and (B) the offense level for that offense can be determined; or (2) 8 plus the number of offense levels from the table in §2B1.1 (Theft, Property Destruction, and Fraud) corresponding to the value of the laundered funds, otherwise.
	+22	Using more than \$25 million threshold under 2B1.1
Enhancement	+2	2S1.1(b)(2)(B) permits enhancement for 2 points if the conviction is pursuant to §1956.
Enhancement	+2	2S1.1(b)(3) adds two points for sophisticated laundering (which the guidelines lists as involving shell corporations and offshore financial accounts.
Enhancement:	+4	3B1.1(a) aggravating role – 5 or more participants or otherwise extensive
Enhancement:	+2	3C1.1 obstruction
Combined Offense level	+0	3D1.4
Acceptance:	-3	3E1.1(b) acceptance of responsibility
Total for Counts One and Two:	<b>37</b>	<b>Advisory guidelines range of 210-262</b>



The defendant agrees that all of the Sentencing Guidelines for money laundering applicable to charges brought under 18 U.S.C. § 1956 apply to Count One of the Superseding Criminal Information brought under 18 U.S.C. § 371.

For the purposes of the Sentencing Guidelines analysis, the government calculates the highest guideline range among the offenses, namely the object of the conspiracy to violate Title 18 U.S.C. § 1956. The defendant's estimated guideline range for Count Two, the conspiracy to obstruct justice, is 30 (before any reduction for acceptance of responsibility), and would be grouped with Count One pursuant to §3D1.2(c).

### **B. Acceptance of Responsibility**

The Government agrees that a 2-level reduction will be appropriate, pursuant to U.S.S.G. § 3E1.1, provided that your client clearly demonstrates acceptance of responsibility, to the satisfaction of the Government, through your client's allocution, adherence to every provision of this Agreement, and conduct between entry of the plea and imposition of sentence. If the defendant has accepted responsibility as described above, and if the defendant pleads guilty on or before September 14, 2018, subject to the availability of the Court, an additional one-level reduction will be warranted, pursuant to U.S.S.G. § 3E1.1(b).

Nothing in this Agreement limits the right of the Government to seek denial of the adjustment for acceptance of responsibility, pursuant to U.S.S.G. § 3E1.1, and/or imposition of an adjustment for obstruction of justice, pursuant to U.S.S.G. § 3C1.1, regardless of any agreement set forth herein, should your client move to withdraw his guilty plea after it is entered, or should it be determined by the Government that your client has either (a) engaged in conduct, unknown to the Government at the time of the signing of this Agreement, that constitutes obstruction of justice, or (b) engaged in additional criminal conduct after signing this Agreement.

In accordance with the above, the applicable Guidelines Offense Level will be at least 37.

### **C. Estimated Criminal History Category**

Based upon the information now available to this Office, your client has no criminal convictions, other than in the Eastern District of Virginia. Your client acknowledges that depending on when he is sentenced here and how the Guidelines are interpreted, he may have a criminal history. If additional convictions are discovered during the pre-sentence investigation by the United States Probation Office, your client's criminal history points may increase.

### **D. Estimated Applicable Guidelines Range**

Based upon the total offense level and the estimated criminal history category set forth above, the Office calculates your client's estimated Sentencing Guidelines range is 210 months to 262 months' imprisonment (the "Estimated Guidelines Range"). In addition, the Office calculates that, pursuant to U.S.S.G. § 5E1.2, should the Court impose a fine, at Guidelines level

37, the estimated applicable fine range is \$40,000 to \$400,000. Your client reserves the right to ask the Court not to impose any applicable fine.

Your client agrees that, solely for the purposes of calculating the applicable range under the Sentencing Guidelines, a downward departure from the Estimated Guidelines Range set forth above is not warranted, subject to the paragraphs regarding cooperation below. Accordingly, you will not seek any departure or adjustment to the Estimated Guidelines Range set forth above, nor suggest that the Court consider such a departure or adjustment for any other reason other than those specified above. Your client also reserves the right to disagree with the Estimated Guideline Range calculated by the Office with respect to role in the offense. However, your client understands and acknowledges that the Estimated Guidelines Range agreed to by the Office is not binding on the Probation Office or the Court. Should the Court or Probation Office determine that a different guidelines range is applicable, your client will not be permitted to withdraw his guilty plea on that basis, and the Government and your client will still be bound by this Agreement.

Your client understands and acknowledges that the terms of this section apply only to conduct that occurred before the execution of this Agreement. Should your client engage in any conduct after the execution of this Agreement that would form the basis for an increase in your client's base offense level or justify an upward departure (examples of which include, but are not limited to, obstruction of justice, failure to appear for a court proceeding, criminal conduct while pending sentencing, and false statements to law enforcement agents, the probation officer, or the Court), the Government is free under this Agreement to seek an increase in the base offense level based on that post-agreement conduct.

##### **5. Agreement as to Sentencing Allocation**

Based upon the information known to the Government at the time of the signing of this Agreement, the parties further agree that a sentence within the Estimated Guidelines Range (or below) would constitute a reasonable sentence in light of all of the factors set forth in 18 U.S.C. § 3553(a), should such a sentence be subject to appellate review notwithstanding the appeal waiver provided below.

##### **6. Reservation of Allocation**

The Government and your client reserve the right to describe fully, both orally and in writing, to the sentencing judge, the nature and seriousness of your client's misconduct, including any misconduct not described in the charge to which your client is pleading guilty.

The parties also reserve the right to inform the presentence report writer and the Courts of any relevant facts, to dispute any factual inaccuracies in the presentence report, and to contest any matters not provided for in this Agreement. In the event that the Courts considers any Sentencing Guidelines adjustments, departures, or calculations different from any agreements contained in this Agreement, or contemplates a sentence outside the Guidelines range based upon the general sentencing factors listed in 18 U.S.C. § 3553(a), the parties reserve the right to answer any related inquiries from the Courts. In addition, your client acknowledges that the

Government is not obligated to file any post-sentence downward departure motion in this case pursuant to Rule 35(b) of the Federal Rules of Criminal Procedure.

**7. Court Not Bound by this Agreement or the Sentencing Guidelines**

Your client understands that the sentence in this case will be imposed in accordance with 18 U.S.C. § 3553(a), upon consideration of the Sentencing Guidelines. Your client further understands that the sentence to be imposed is a matter solely within the discretion of the Courts. Your client acknowledges that the Courts are not obligated to follow any recommendation of the Government at the time of sentencing or to grant a downward departure based on your client's substantial assistance to the Government, even if the Government files a motion pursuant to Section 5K1.1 of the Sentencing Guidelines. Your client understands that neither the Government's recommendation nor the Sentencing Guidelines are binding on the Courts.

Your client acknowledges that your client's entry of a guilty plea to the charged offenses authorizes the Court to impose any sentence, up to and including the statutory maximum sentence, which may be greater than the applicable Guidelines range determined by the Court. Although the parties agree that the sentences here and in the Eastern District of Virginia should run concurrently to the extent there is factual overlap (i.e. the tax and foreign bank account charges), that recommendation is not binding on either Court. The Government cannot, and does not, make any promise or representation as to what sentences your client will receive. Moreover, your client acknowledges that your client will have no right to withdraw your client's plea of guilty should the Courts impose sentences that are outside the Guidelines range or if the Courts do not follow the Government's sentencing recommendation. The Government and your client will be bound by this Agreement, regardless of the sentence imposed by the Courts. Any effort by your client to withdraw the guilty plea because of the length of the sentence shall constitute a breach of this Agreement.

**8. Cooperation**

Your client shall cooperate fully, truthfully, completely, and forthrightly with the Government and other law enforcement authorities identified by the Government in any and all matters as to which the Government deems the cooperation relevant. This cooperation will include, but is not limited to, the following:

- (a) The defendant agrees to be fully debriefed and to attend all meetings at which his presence is requested, concerning his participation in and knowledge of all criminal activities.
- (b) The defendant agrees to furnish to the Government all documents and other material that may be relevant to the investigation and that are in the defendant's possession or control and to participate in undercover activities pursuant to the specific instructions of law enforcement agents or the Government.
- (c) The defendant agrees to testify at any proceeding in the District of Colombia or elsewhere as requested by the Government.

- (d) The defendant consents to adjournments of his sentences as requested by the Government.
- (e) The defendant agrees that all of the defendant's obligations under this agreement continue after the defendant is sentenced here and in the Eastern District of Virginia; and
- (f) The defendant must at all times give complete, truthful, and accurate information and testimony, and must not commit, or attempt to commit, any further crimes.

Your client acknowledges and understands that, during the course of the cooperation outlined in this Agreement, your client will be interviewed by law enforcement agents and/or Government attorneys. Your client waives any right to have counsel present during these interviews and agrees to meet with law enforcement agents and Government attorneys outside of the presence of counsel. If, at some future point, you or your client desire to have counsel present during interviews by law enforcement agents and/or Government attorneys, and you communicate this decision in writing to this Office, this Office will honor this request, and this change will have no effect on any other terms and conditions of this Agreement.

Your client shall testify fully, completely and truthfully before any and all Grand Juries in the District of Columbia and elsewhere, and at any and all trials of cases or other court proceedings in the District of Columbia and elsewhere, at which your client's testimony may be deemed relevant by the Government.

Your client understands and acknowledges that nothing in this Agreement allows your client to commit any criminal violation of local, state or federal law during the period of your client's cooperation with law enforcement authorities or at any time prior to the sentencing in this case. The commission of a criminal offense during the period of your client's cooperation or at any time prior to sentencing will constitute a breach of this Agreement and will relieve the Government of all of its obligations under this Agreement, including, but not limited to, its obligation to inform this Court of any assistance your client has provided. However, your client acknowledges and agrees that such a breach of this Agreement will not entitle your client to withdraw your client's plea of guilty or relieve your client of the obligations under this Agreement.

Your client agrees that the sentencing in this case and in the Eastern District of Virginia may be delayed until your client's efforts to cooperate have been completed, as determined by the Government, so that the Courts will have the benefit of all relevant information before a sentence is imposed.

**9. Government's Obligations**



The Government will bring to the Courts' attention at the time of sentencing the nature and extent of your client's cooperation or lack of cooperation. The Government will evaluate the full nature and extent of your client's cooperation to determine whether your client has provided substantial assistance in the investigation or prosecution of another person who has committed an offense. If this Office determines that the defendant has provided substantial assistance in the form of truthful information and, where applicable, testimony, the Office will file motions pursuant to Section 5K1.1 of the United States Sentencing Guidelines. Defendant will then be free to argue for any sentence below the advisory Sentencing Guidelines range calculated by the Probation Office, including probation.

10. **Waivers**

A. **Venue**

Your client waives any challenge to venue in the District of Columbia.

B. **Statute of Limitations**

Your client agrees that, should any plea or conviction following your client's pleas of guilty pursuant to this Agreement, or the guilty verdicts in the Eastern District of Virginia, be vacated, set aside, or dismissed for any reason (other than by government motion as set forth herein), any prosecution based on the conduct set forth in the attached Statement of the Offense, as well as any crimes that the Government has agreed not to prosecute or to dismiss pursuant to this Agreement, that is not time-barred by the applicable statute of limitations on the date of the signing of this Agreement, may be commenced or reinstated against your client, notwithstanding the expiration of the statute of limitations between the signing of this Agreement and the commencement or reinstatement of such prosecution. It is the intent of this Agreement to waive all defenses based on the statute of limitations with respect to any prosecution of conduct set forth in the attached Statement of the Offense, or any other crimes that the Government has agreed not to prosecute, that are not time-barred on the date that this Agreement is signed. The Office and any other party will be free to use against your client, directly and indirectly, in any criminal or civil proceeding, all statements made by your client, including the Statement of the Offense, and any of the information or materials provided by your client, including such statements, information, and materials provided pursuant to this Agreement or during the course of any debriefings conducted in anticipation of, or after entry of, this Agreement, whether or not the debriefings were previously a part of proffer-protected debriefings, and your client's statements made during proceedings before the Court pursuant to Rule 11 of the Federal Rules of Criminal Procedure.

C. **Trial and Other Rights**

Your client understands that by pleading guilty in this case your client agrees to waive certain rights afforded by the Constitution of the United States and/or by statute or rule. Your client agrees to forgo the right to any further discovery or disclosures of information not already provided at the time of the entry of your client's guilty plea. Your client also agrees to waive,

among other rights, the right to be indicted by a Grand Jury, the right to plead not guilty, and the right to a jury trial. If there were a jury trial, your client would have the right to be represented by counsel, to confront and cross-examine witnesses against your client, to challenge the admissibility of evidence offered against your client, to compel witnesses to appear for the purpose of testifying and presenting other evidence on your client's behalf, and to choose whether to testify. If there were a jury trial and your client chose not to testify at that trial, your client would have the right to have the jury instructed that your client's failure to testify could not be held against your client. Your client would further have the right to have the jury instructed that your client is presumed innocent until proven guilty, and that the burden would be on the United States to prove your client's guilt beyond a reasonable doubt. If your client were found guilty after a trial, your client would have the right to appeal your client's conviction. Your client understands that the Fifth Amendment to the Constitution of the United States protects your client from the use of compelled self-incriminating statements in a criminal prosecution. By entering a plea of guilty, your client knowingly and voluntarily waives or gives up your client's right against compelled self-incrimination.

Your client acknowledges discussing with you Rule 11(f) of the Federal Rules of Criminal Procedure and Rule 410 of the Federal Rules of Evidence, which ordinarily limit the admissibility of statements made by a defendant in the course of plea discussions or plea proceedings if a guilty plea is later withdrawn. Your client knowingly and voluntarily hereby waives the rights that arise under these rules to object to the use of all such statements by him on and after September 10, 2018, in the event your client breaches this agreement, withdraws his guilty plea, or seeks to withdraw from this Agreement after signing it. This Agreement supersedes the proffer agreement between the Government and the client.

Your client also agrees to waive all constitutional and statutory rights to a speedy sentence and agrees that the pleas of guilty pursuant to this Agreement will be entered at a time decided upon by the parties with the concurrence of the Court. Your client understands that the date for sentencing will be set by the Courts.

Your client agrees not to accept remuneration or compensation of any sort, directly or indirectly, for the dissemination through any means, including but not limited to books, articles, speeches, blogs, podcasts, and interviews, however disseminated, regarding the conduct encompassed by the Statement of the Offense, or the investigation by the Office or prosecution of any criminal or civil cases against him.

#### **D. Appeal Rights**

Your client understands that federal law, specifically 18 U.S.C. § 3742, affords defendants the right to appeal their sentences in certain circumstances. Your client agrees to waive the right to appeal the sentences in this case and the Eastern District of Virginia, including but not limited to any term of imprisonment, fine, forfeiture, award of restitution, term or condition of supervised release, authority of the Courts to set conditions of release, and the manner in which the sentences were determined, except to the extent the Courts sentence your client above the statutory maximum or guidelines range determined by the Courts or your client claims that your client received ineffective assistance of counsel, in which case your client would



have the right to appeal the illegal sentence or above-guidelines sentence or raise on appeal a claim of ineffective assistance of counsel, but not to raise on appeal other issues regarding the sentencings. In agreeing to this waiver, your client is aware that your client's sentences have yet to be determined by the Courts. Realizing the uncertainty in estimating what sentences the Courts ultimately will impose, your client knowingly and willingly waives your client's right to appeal the sentence, to the extent noted above, in exchange for the concessions made by the Government in this Agreement.

#### **E. Collateral Attack**

Your client also waives any right to challenge the conviction entered or sentence imposed under this Agreement or in the Eastern District of Virginia or otherwise attempt to modify or change the sentences or the manner in which they were determined in any collateral attack, including, but not limited to, a motion brought under 28 U.S.C. § 2255 or Federal Rule of Civil Procedure 60(b), except to the extent such a motion is based on a claim that your client received ineffective assistance of counsel.

Your client agrees that with respect to all charges referred to herein he is not a "prevailing party" within the meaning of the "Hyde Amendment," 18 U.S.C. § 3006A note, and will not file any claim under that law.

#### **F. Privacy Act and FOIA Rights**

Your client also agrees to waive all rights, whether asserted directly or by a representative, to request or receive from any department or agency of the United States any records pertaining to the investigation or prosecution of this case, including and without limitation any records that may be sought under the Freedom of Information Act, 5 U.S.C. § 552, or the Privacy Act, 5 U.S.C. § 552a, for the duration of the Special Counsel's investigation.

#### **11. Restitution**

Your client understands that the Court has an obligation to determine whether, and in what amount, mandatory restitution applies in this case under 18 U.S.C. § 3663A. The Government and your client agree that mandatory restitution does not apply in this case.

#### **12. Forfeiture**

a) Your client agrees to the forfeiture set forth in the Forfeiture Allegations in the Superseding Criminal Information to which your client is pleading guilty. Your client further agrees to forfeit criminally and civilly the following properties (collectively, the "Forfeited Assets") to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(A), 981(a)(1)(C), 982(a)(1), 982(a)(2); Title 21, United States Code, Section 853(p), and Title 28 U.S.C. § 2461(c), and further agrees to waive all interest in such assets in any administrative or judicial forfeiture proceeding, whether criminal or civil, state or federal:

- 1) The real property and premises commonly known as 377 Union Street, Brooklyn, New



- York 11231 (Block 429, Lot 65), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
- 2) The real property and premises commonly known as 29 Howard Street, #4D, New York, New York 10013 (Block 209, Lot 1104), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
  - 3) The real property and premises commonly known as 174 Jobs Lane, Water Mill, New York 11976, including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
  - 4) All funds held in account number 0969 at The Federal Savings Bank, and any property traceable thereto;
  - 5) All funds seized from account number 1388 at Capital One N.A., and any property traceable thereto;
  - 6) All funds seized from account number 9952 at The Federal Savings Bank, and any property traceable thereto;
  - 7) Northwestern Mutual Universal Life Insurance Policy and any property traceable thereto;
  - 8) The real property and premises commonly known as 123 Baxter Street, #5D, New York, New York 10016 in lieu of 1046 N. Edgewood Street; and
  - 9) The real property and premises commonly known as 721 Fifth Avenue, #43G, New York, New York 10022 in lieu of all funds from account number at Charles Schwab & Co. Inc., and any property traceable thereto.

Your client agrees that his consent to forfeiture is final and irrevocable as to his interests in the Forfeited Assets.

b) Your client agrees that the facts set forth in the Statement of Facts and admitted to by your client establish that the Forfeited Assets are forfeitable to the United States pursuant to Title 18, United States Code, Sections 981 and 982, Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461. Your client admits that the Forfeited Assets numbered 1 through 7, above, represent property that constitutes or is derived from proceeds of, and property involved in, the criminal offenses in the Superseding Criminal Information to which your client is pleading guilty. Your client further agrees that all the Forfeited Assets (numbered 1 through 9) can additionally be considered substitute assets for the purpose of forfeiture to the United States pursuant to Title 18, United States Code, Section 982(b); Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c).

c) Your client agrees that the Court may enter a preliminary order of forfeiture for the Forfeited Assets at the time of your client's guilty plea or at any time before sentencing, and consents thereto. Your client agrees that the Court can enter a Final Order of Forfeiture for the Forfeited Assets, and could do so as part of his sentence.

d) Your client further agrees that the government may choose in its sole discretion how it wishes to accomplish forfeiture of the property whose forfeiture your client has consented to in this plea agreement, whether by criminal or civil forfeiture, using judicial or non-judicial forfeiture processes. If the government chooses to effect the forfeiture provisions of this plea agreement through the criminal forfeiture process, your client agrees to the entry of orders of forfeiture for such property and waives the requirements of Federal Rules of Criminal Procedure 11(b)(1)(J) and 32.2 regarding notice of the forfeiture in the charging instrument, advice regarding the forfeiture at the change-of-plea hearing, announcement of the forfeiture at sentencing, and incorporation of the forfeiture in the judgment.

e) Your client understands that the United States may institute civil or administrative forfeiture proceedings against all forfeitable property in which your client has an interest, including the Forfeited Assets, without regard to the status of his criminal conviction. Your client further consents to the civil forfeiture of the Forfeited Assets to the United States, without regard to the status of his criminal conviction. In connection therewith, your client specifically agrees to waive all right, title, and interest in the Forfeited Assets, both individually and on behalf of DMP International, Summerbreeze LLC, or any other entity of which he is an officer, member, or has any ownership interest. Your client waives all defenses based on statute of limitations and venue with respect to any administrative or civil forfeiture proceeding related to the Forfeited Assets.

f) Your client represents that with respect to each of the Forfeited Assets, he is either the sole and rightful owner and that no other person or entity has any claim or interest, or that he has secured the consent from any other individuals or entities having an interest in the Forfeited Assets to convey their interests in the Forfeited Assets to him prior to entry of the Order of Forfeiture (with the exception of previously disclosed mortgage holders). Your client warrants that he has accurately represented to the Government all those individuals and entities having an interest in the Forfeited Assets and the nature and extent of those interests, including any mortgages or liens on the Forfeited Assets. Your client agrees to take all steps to pass clear title to the Forfeited Assets to the United States (with the exception of previously disclosed mortgage liens). Your client further agrees to testify truthfully in any judicial forfeiture proceeding, and to take all steps to effectuate the same as requested by the Government. Your client agrees to take all steps requested by the Government to obtain from any other parties by any lawful means any records of assets owned at any time by your client, including but not limited to the Forfeited Assets, and to otherwise facilitate the effectuation of forfeiture and the maximization of the value of Forfeited Assets for the United States.

g) Your client agrees that, to the extent that he does not convey to the United States

clear title to each of the Forfeited Assets, the United States is entitled, in its sole discretion, either to vacatur of the plea agreement or to forfeiture to the United States of a sum of money equal to the value of that asset at the time this agreement was executed. Your client consents to modification of any Order of Forfeiture at any point to add such sum of money as a forfeiture judgment in substitution for Forfeited Assets.

h) Your client hereby abandons any interest he has in all forfeitable property and consents to any disposition of the property by the government without further notice or obligation whatsoever owing to your client.

i) Your client agrees not to interpose any claim, or to assist others to file or interpose any claim, to the Forfeited Assets in any proceeding, including but not limited to any civil or administrative forfeiture proceedings and any ancillary proceedings related to criminal forfeiture. Your client agrees that he shall not file any petitions for remission, restoration, or any other assertion of ownership or request for return relating to the Forfeited Assets, or any other action or motion seeking to collaterally attack the seizure, restraint, forfeiture, or conveyance of the Forfeited Assets, nor shall your client assist any other in filing any such claims, petitions, actions, or motion. Contesting or assisting others in contesting forfeiture shall constitute a material breach of the Agreement, relieving the United States of all its obligations under the Agreement. Your client agrees not to seek or accept, directly or indirectly, reimbursement or indemnification from any source with regard to the assets forfeited pursuant to this Agreement.

j) In the event your client fails to deliver the assets forfeited pursuant to this agreement, or in any way fails to adhere to the forfeiture provisions of this agreement, the United States reserves all remedies available to it, including but not limited to vacating the Agreement based on a breach of the Agreement by your client.

k) Your client agrees that the forfeiture provisions of this plea agreement are intended to, and will, survive him notwithstanding the abatement of any underlying criminal conviction after the execution of this Agreement.

l) Your client agrees that he will not claim, assert, or apply for, directly or indirectly, any tax deduction, tax credit, or any other taxable offset with regard to any federal, state, or local tax or taxable income for payments of any assets forfeited pursuant to this Agreement.

m) Your client agrees to waive all constitutional and statutory challenges in any manner (including, but not limited to, direct appeal) to any forfeiture carried out in accordance with this Agreement on any grounds, including that the forfeiture constitutes an excessive fine or punishment.

### **13. Breach of Agreement**

Your client understands and agrees that, if after entering this Agreement, your client fails specifically to perform or to fulfill completely each and every one of your client's obligations under this Agreement, or engages in any criminal activity prior to sentencing or during his cooperation (whichever is later), your client will have breached this Agreement. Should it be judged by the Government in its sole discretion that the defendant has failed to cooperate fully, has intentionally given false, misleading or incomplete information or testimony, has committed or attempted to commit any further crimes, or has otherwise violated any provision of this agreement, the defendant will not be released from his pleas of guilty but the Government will be released from its obligations under this agreement, including (a) not to oppose a downward adjustment of two levels for acceptance of responsibility described above, and to make the motion for an additional one-level reduction described above and (b) to file the motion for a downward departure for cooperation described above. Moreover, the Government may withdraw the motion described above, if such motion has been filed prior to sentencing. In the event that it is judged by the Government that there has been a breach: (a) your client will be fully subject to criminal prosecution, in addition to the charges contained in the Superseding Criminal Information, for any crimes to which he has not pled guilty, including perjury and obstruction of justice; and (b) the Government and any other party will be free to use against your client, directly and indirectly, in any criminal or civil proceeding, all statements made by your client, including the Statement of the Offense, and any of the information or materials provided by your client, including such statements, information, and materials provided pursuant to this Agreement or during the course of any debriefings conducted in anticipation of, or after entry of, this Agreement, whether or not the debriefings were previously a part of proffer-protected debriefings, and your client's statements made during proceedings before the Court pursuant to Rule 11 of the Federal Rules of Criminal Procedure.

Your client understands and agrees that the Government shall be required to prove a breach of this Agreement only by good faith.

Nothing in this Agreement shall be construed to protect your client from prosecution for any crimes not included within this Agreement or committed by your client after the execution of this Agreement. Your client understands and agrees that the Government reserves the right to prosecute your client for any such offenses. Your client further understands that any perjury, false statements or declarations, or obstruction of justice relating to your client's obligations under this Agreement shall constitute a breach of this Agreement. In the event of such a breach, your client will not be allowed to withdraw your client's guilty plea.

### **14. Complete Agreement**

Apart from the written proffer agreement initially dated September 11, 2018, which this Agreement supersedes, no agreements, promises, understandings, or representations have been



made by the parties or their counsel other than those contained in writing herein, nor will any such agreements, promises, understandings, or representations be made unless committed to writing and signed by your client, defense counsel, and the Office.

Your client further understands that this Agreement is binding only upon the Office. This Agreement does not bind any United States Attorney's Office, nor does it bind any other state, local, or federal prosecutor. It also does not bar or compromise any civil, tax, or administrative claim pending or that may be made against your client.

If the foregoing terms and conditions are satisfactory, your client may so indicate by



signing this Agreement and the Statement of the Offense, and returning both to the Office no later than September 14, 2018.

Sincerely yours,

ROBERT S. MUELLER, III  
Special Counsel

By:



Andrew Weissmann

Jeannie S. Rhee

Greg D. Andres

Kyle R. Freeny

Senior/Assistant Special Counsels





DEFENDANT'S ACCEPTANCE

I have read every page of this Agreement and have discussed it with my attorneys Kevin Downing, Thomas Zehnle, and Richard Westling. I am fully satisfied with the legal representation by them, who I have chosen to represent me herein. Nothing about the quality of the representation of other counsel is affecting my decision herein to plead guilty. I fully understand this Agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Agreement fully. I am pleading guilty because I am in fact guilty of the offense identified in this Agreement.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in this Agreement. I am satisfied with the legal services provided by my attorneys in connection with this Agreement and matters related to it.


Date: 9-13-18

  
\_\_\_\_\_  
Paul J. Manafort, Jr.  
Defendant

ATTORNEYS' ACKNOWLEDGMENT

I have read every page of this Agreement, reviewed this Agreement with my client, Paul J. Manafort, and fully discussed the provisions of this Agreement with my client. These pages accurately and completely set forth the entire Agreement. I concur in my client's desire to plead guilty as set forth in this Agreement.

Date: 9-13-2018

  
\_\_\_\_\_  
Kevin M. Downing  
Richard W. Westling  
Thomas E. Zehnle  
Attorneys for Defendant



**FILED**

**SEP 14 2018**

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

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CRIMINAL NO. 17-201-1 (ABJ)

Violations: 18 U.S.C. § 371  
(Conspiracy Against the United States  
and Conspiracy to Obstruct Justice)

**STATEMENT OF THE OFFENSES AND OTHER ACTS**

Pursuant to the Federal Rules of Criminal Procedure 11, the United States and the defendant PAUL J. MANAFORT, JR. (MANAFORT) stipulate and agree that the following facts are true and accurate. These facts do not constitute all of the facts known to the parties concerning the charged offense and covered conduct. This statement is being submitted by the parties to demonstrate that sufficient facts exist to establish that the defendant committed the offenses to which he is pleading guilty.

**Count 1: Conspiracy Against the United States (18 U.S.C. § 371)**

1. At all relevant times herein, MANAFORT was an owner of Davis Manafort Partners, Inc. (DMP) or DMP International, LLC (DMI) or both. MANAFORT engaged in a variety of criminal schemes, and knowingly, intentionally, and willfully conspired with Richard W. Gates, Konstantin Kilimnik, and others to carry out the criminal schemes that make up Counts One and Two of the Information, as more fully set forth below.

**A. FARA Conspiracy  
22 U.S.C. §§ 612 and 618(a)(1)**

**MANAFORT's Lobbying in the United States on Behalf of the Government of Ukraine**



2. MANAFORT knew it was illegal to lobby government officials and engage in public relations activities (hereinafter collectively referred to as lobbying) in the United States on behalf of a foreign government or political party, without registering with the United States Government under the Foreign Agents Registration Act. MANAFORT knew he was lobbying in the United States for the Government of Ukraine, President Viktor F. Yanukovich, the Party of Regions, and the Opposition Bloc (the latter two being political parties in Ukraine), and thus he was supposed to submit a written registration statement to the United States Department of Justice. MANAFORT knew that the filing was required to disclose the name of the foreign country, all the financial payments to the lobbyist, and the specific steps undertaken for the foreign country in the United States, among other information.

3. MANAFORT knew that Ukraine had a strong interest in the United States' taking economic and policy positions favorable to Ukraine, including not imposing sanctions on Ukraine. MANAFORT also knew that the trial and treatment of President Yanukovich's political rival, former Prime Minister Yulia Tymoshenko, was strongly condemned by leading United States executive and legislative branch officials, and was a major hurdle to improving United States and Ukraine relations.

4. From 2006 until 2015, MANAFORT led a multi-million dollar lobbying campaign in the United States at the direction of the Government of Ukraine, President Yanukovich, the Party of Regions, and the Opposition Bloc. MANAFORT intentionally did so without registering and providing the disclosures required by law.

5. As part of the lobbying scheme, MANAFORT hired numerous firms and people to assist in his lobbying campaign in the United States. He hired Companies A, B, C, D, and E, and Law Firm A, among others, to participate in what he described to President Yanukovich in writing as a global

“Engage Ukraine” lobbying campaign that he devised and led. These companies and law firm were paid the equivalent of over \$11 million for their Ukraine work.

6. MANAFORT viewed secrecy for himself and for the actions of his lobbyists as integral to the effectiveness of the lobbying offensive he orchestrated for Ukraine. Filing under the Foreign Agents Registration Act would have thwarted the secrecy MANAFORT sought in order to conduct an effective campaign for Ukraine to influence both American leaders and the American public.

7. MANAFORT took steps to avoid any of these firms and people disclosing their lobbying efforts under the Foreign Agents Registration Act. As one example, even though MANAFORT engaged Company E in 2007 to lobby in the United States for the Government of Ukraine, MANAFORT tried to dissuade Company E from filing under the Foreign Agents Registration Act. Only after MANAFORT ceased to use Company E in the fall of 2007 did Company E disclose its work for Ukraine, in a belated filing under the Act in 2008.

8. MANAFORT took other measures to keep the Ukraine lobbying as secret as possible. For example, MANAFORT, in written communications on or about May 16, 2013, directed his lobbyists (including Persons D1 and D2, who worked for Company D) to write and disseminate within the United States news stories that alleged that Tymoshenko had paid for the murder of a Ukrainian official. MANAFORT stated that it should be “push[ed]” “[w]ith no fingerprints.” “It is very important we have no connection.” MANAFORT stated that “[m]y goal is to plant some stink on Tymo.” Person D1 objected to the plan, but ultimately Persons D1 and D2 complied with MANAFORT’s direction. The Foreign Agents Registration Act required MANAFORT to disclose such lobbying, as MANAFORT knew. He did not.

#### The Hapsburg Group and Company D

9. As part of the lobbying scheme, starting in 2011, MANAFORT secretly retained Company

D and a group of four former European heads of state and senior officials (including a former Austrian Chancellor, Italian Prime Minister, and Polish President) to lobby in the United States and Europe on behalf of Ukraine. The former politicians, called the Hapsburg Group by MANAFORT, appeared to be providing solely their independent assessments of Government of Ukraine policies, when in fact they were paid by Ukraine. MANAFORT explained in an "EYES ONLY" memorandum in or about June 2012 that his purpose was to "assemble a small group of high-level European influential [sic] champions and politically credible friends who can act informally and without any visible relationship with the Government of Ukraine."

10. Through MANAFORT, the Government of Ukraine retained an additional group of lobbyists (Company D and Persons D1 and D2). In addition to lobbying itself, Company D secretly served as intermediaries between the Hapsburg Group and MANAFORT and the Government of Ukraine. In or about 2012 through 2013, MANAFORT directed more than the equivalent of 700,000 euros to be wired from at least three of his offshore accounts to the benefit of Company D to pay secretly for its services.

11. All four Hapsburg Group members, at the direction, and with the direct assistance, of MANAFORT, advocated positions favorable to Ukraine in meetings with United States lawmakers, interviews with United States journalists, and ghost written op-eds in American publications. In or about 2012 through 2014, MANAFORT directed more than 2 million euros to be wired from at least four of his offshore accounts to pay secretly the Hapsburg Group. To avoid European taxation, the contract with the Hapsburg Group falsely stated that none of its work would take place in Europe.

12. One of the Hapsburg Group members, a former Polish President, was also a representative of the European Parliament with oversight responsibility for Ukraine. MANAFORT solicited that



official to provide MANAFORT inside information about the European Parliament's views and actions toward Ukraine and to take actions favorable to Ukraine. MANAFORT also used this Hapsburg Group member's current European Parliament position to Ukraine's advantage in his lobbying efforts in the United States. In the fall of 2012, the United States Senate was considering and ultimately passed a resolution critical of President Yanukovych's treatment of former Prime Minister Tymoshenko. MANAFORT engaged in an all-out campaign to try to kill or delay the passage of this resolution. Among the steps he took was having the Hapsburg Group members reach out to United States Senators, as well as directing Companies A and B to have private conversations with Senators to lobby them to place a "hold" on the resolution. MANAFORT told his lobbyists to stress to the Senators that the former Polish President who was advocating against the resolution was currently a designated representative of the President of the European Parliament, to give extra clout to his supposedly independent judgment against the Senate resolution. MANAFORT never revealed to the Senators or to the American public that any of these lobbyists or Hapsburg Group members were paid by Ukraine.

13. In another example, on May 16, 2013, another member of the Hapsburg Group lobbied in the United States for Ukraine. The Hapsburg Group member accompanied his country's prime minister to the Oval Office and met with the President and Vice President of the United States, as well as senior United States officials in the executive and legislative branches. In written communications sent to MANAFORT, Person D1 reported that the Hapsburg Group member delivered the message of not letting "Russians Steal Ukraine from the West." The Foreign Agents Registration Act required MANAFORT to disclose such lobbying, as MANAFORT knew. He did not.

Law Firm Report and Tymoshenko



14. As another part of the lobbying scheme, in 2012, on behalf of President Yanukovych and the Government of Ukraine's Ministry of Justice, MANAFORT solicited a United States law firm to write a report evaluating the trial of Yanukovych's political opponent Yulia Tymoshenko. MANAFORT caused Ukraine to hire the law firm so that its report could be used in the United States and elsewhere to defend the Tymoshenko criminal trial and argue that President Yanukovych and Ukraine had not engaged in selective prosecution.

15. MANAFORT retained a public relations firm (Company C) to prepare a media roll-out plan for the law firm report. MANAFORT used one of his offshore accounts to pay Company C the equivalent of more than \$1 million for its services.

16. MANAFORT worked closely with Company C to develop a detailed written lobbying plan in connection with what MANAFORT termed the "selling" of the report. This campaign included getting the law firm's report "seeded" to the press in the United States—that is, to leak the report ahead of its official release to a prominent United States newspaper and then use that initial article to influence reporting globally. As part of the roll-out plan, on the report's issuance on December 13, 2012, MANAFORT arranged to have the law firm disseminate hard copies of the report to numerous government officials, including senior United States executive and legislative branch officials.

17. MANAFORT reported on the law firm's work on the report and Company C's lobbying plan to President Yanukovych and other representatives of the Government of Ukraine. For example, in a July 27, 2012 memorandum to President Yanukovych's Chief of Staff, MANAFORT reported on "the global rollout strategy for the [law firm's] legal report, and provide[d] a detailed plan of action[]" which included step-by-step lobbying outreach in the United States.

18. MANAFORT directed lobbyists to tout the report as showing that President Yanukovych

20. MANAFORT also knew that the Government of Ukraine did not want to disclose how much the report cost. More than \$4.6 million was paid to the law firm for its work. MANAFORT used one of his offshore accounts to funnel \$4 million to pay the law firm, a fact that MANAFORT did not disclose to the public. Instead, the Government of Ukraine reported falsely that the report cost just \$12,000.

22. In addition to the law firm report, MANAFORT took other steps on behalf of the Government of Ukraine to tarnish Tymoshenko in the United States. In addition to disseminating stories about her soliciting murder, noted above, in October 2012, MANAFORT orchestrated a scheme to have, as he wrote in a contemporaneous communication, “[O]bama jews” put pressure on the Administration to disavow Tymoshenko and support Yanukovich. MANAFORT sought to undermine United States support for Tymoshenko by spreading stories in the United States that



a senior Cabinet official (who had been a prominent critic of Yanukovych's treatment of Tymoshenko) was supporting anti-Semitism because the official supported Tymoshenko, who in turn had formed a political alliance with a Ukraine party that espoused anti-Semitic views. MANAFORT coordinated privately with a senior Israeli government official to issue a written statement publicizing this story. MANAFORT then, with secret advance knowledge of that Israeli statement, worked to disseminate this story in the United States, writing to Person D1 "I have someone pushing it on the NY Post. Bada bing bada boom." MANAFORT sought to have the Administration understand that "the Jewish community will take this out on Obama on election day if he does nothing." MANAFORT then told his United States lobbyist to inform the Administration that Ukraine had worked to prevent the Administration's presidential opponent from including damaging language in the Israeli statement, so as not to harm the Administration, and thus further ingratiate Yanukovych with the Administration.

Company A and Company B

23. As a third part of the lobbying scheme, in February 2012, MANAFORT solicited two Washington, D.C. lobbying firms (Company A and Company B) to lobby in the United States on behalf of President Yanukovych, the Party of Regions and the Government of Ukraine. For instance, in early 2012 at the inception of the relationship, Company B wrote in an email to its team about a "potential representation for the Ukraine," having been contacted "at the suggestion of Paul Manafort who has been working on the current PM elections."

24. MANAFORT arranged to pay Companies A and B over \$2 million from his offshore accounts for their United States lobbying work for Ukraine.

25. MANAFORT provided direction to Companies A and B in their lobbying efforts, including providing support for numerous United States visits by numerous senior Ukrainian officials.



Companies A and B, at MANAFORT's direction, engaged in extensive United States lobbying. Among other things, they lobbied dozens of Members of Congress, their staff, and White House and State Department officials about Ukraine sanctions, the validity of Ukraine elections, and the propriety of President Yanukovich's imprisoning Tymoshenko, his presidential rival.

26. In addition, with the assistance of Company A, MANAFORT also personally lobbied in the United States. He drafted and edited numerous ghost-written op-eds for publication in United States newspapers. He also personally met in March 2013 in Washington, D.C., with a Member of Congress who was on a subcommittee that had Ukraine within its purview. After the meeting, MANAFORT prepared a report for President Yanukovich that the meeting "went well" and reported a series of positive developments for Ukraine from the meeting.

27. Indeed, MANAFORT repeatedly communicated in person and in writing with President Yanukovich and his staff about the lobbying activities of Companies A and B and he tasked the companies to prepare assessments of their work so he, in turn, could brief President Yanukovich. For instance, MANAFORT wrote President Yanukovich a memorandum dated April 8, 2012, in which he provided an update on the lobbying firms' activities "since the inception of the project a few weeks ago. It is my intention to provide you with a weekly update moving forward." In November 2012, Gates wrote to Companies A and B that the firms needed to prepare an assessment of their past and prospective lobbying efforts so the "President" could be briefed by "Paul" "on what Ukraine has done well and what it can do better as we move into 2013." The resulting memorandum from Companies A and B, with input from Gates, noted among other things that the "client" had not been as successful as hoped given that it had an Embassy in Washington.

28. To distance their United States lobbying work from the Government of Ukraine, and to avoid having to register as agents of Ukraine under the Foreign Agents Registration Act,



MANAFORT with others arranged for Companies A and B to be engaged by a newly-formed Brussels entity called the European Centre for the Modern Ukraine (the Centre), instead of directly by the Government of Ukraine.

29. MANAFORT described the Centre as “the Brussels NGO that we have formed” to coordinate lobbying for Ukraine. The Centre was founded by a Ukraine Party of Regions member and Ukraine First Vice-Prime Minister. The head of its Board was another member of the Party of Regions, who became the Ukraine Foreign Minister.

30. In spite of these ties to Ukraine, MANAFORT and others arranged for the Centre to represent falsely that it was not “directly or indirectly supervised, directed, [or] controlled” in whole or in major part by the Government of Ukraine or the Party of Regions. MANAFORT knew that the false and misleading representations would lead Companies A and B not to register their activities pursuant to the Foreign Agents Registration Act.

31. Despite the Centre being the ostensible client of Companies A and B, MANAFORT knew that the Centre did not direct or oversee their work. The firms received direction from MANAFORT and his subordinate Gates, on behalf of the Government of Ukraine.

32. As MANAFORT knows from giving directions to Companies A and B, and from the discovery material provided herein, various employees of Companies A and B understood that they were receiving direction from MANAFORT and President Yanukovich, not the Centre, which was not even operational when Companies A and B began lobbying for Ukraine. MANAFORT, Gates, and employees of both Companies A and B referred to the client in ways that made clear they knew it was Ukraine, for instance noting that the “client” had an Embassy in Washington D.C. The head of Company B told his team to think the President of Ukraine “is the client.” As a Company A employee noted to another company employee: the lobbying for the

Centre was “in name only. [Y]ou’ve gotta see through the nonsense of that[.]” “It’s like Alice in Wonderland.” An employee of Company B described the Centre as a fig leaf, and the Centre’s written certification that it was not related to the Party of Regions as “a fig leaf on a fig leaf,” referring to the Centre in an email as the “European hot dog stand for a Modern Ukraine.”

Conspiring to Obstruct Justice: False and Misleading Submissions to the Department of Justice

33. In September 2016, after numerous press reports concerning MANAFORT had appeared in August, the Department of Justice National Security Division informed MANAFORT, Gates, and DMI in writing that it sought to determine whether they had acted as agents of a foreign principal under the Foreign Agents Registration Act, without registering. In November 2016 and February 2017, MANAFORT and Gates conspired to knowingly and intentionally cause false and misleading letters to be submitted to the Department of Justice, through his unwitting legal counsel. The letters, both of which were approved by MANAFORT before they were submitted by his counsel, represented falsely, among other things, that:

- a. DMI’s “efforts on behalf of the Party of Regions” “did not include meetings or outreach within the U.S.”;
- b. MANAFORT did not “recall meeting with or conducting outreach to U.S. government officials or U.S. media outlets on behalf of the [Centre], nor do they recall being party to, arranging, or facilitating any such communications. Rather, it is the recollection and understanding of Messrs. Gates and Manafort that such communications would have been facilitated and conducted by the [Centre’s] U.S. consultants, as directed by the [Centre]. . . .”;
- c. MANAFORT had merely served as a means of introduction of Company A and Company B to the Centre and provided the Centre with a list of “potential U.S.-based

consultants—including [Company A] and [Company B]—for the [Centre’s] reference and further consideration.”

d. DMI “does not retain communications beyond thirty days” and as a result of this policy, a “search has returned no responsive documents.” The November 2016 letter attached a one-page, undated document that purported to be a DMI “Email Retention Policy.”

34. In fact, MANAFORT had: selected Companies A and B; engaged in weekly scheduled calls and frequent emails with Companies A and B to provide them directions as to specific lobbying steps that should be taken; sought and received detailed oral and written reports from these firms on the lobbying work they had performed; communicated with Yanukovych to brief him on their lobbying efforts; both congratulated and reprimanded Companies A and B on their lobbying work; communicated directly with United States officials in connection with this work; and paid the lobbying firms over \$2.5 million from offshore accounts he controlled, among other things.

35. Although MANAFORT had represented to the Department of Justice in November 2016 and February 2017 that he had no relevant documents, in fact MANAFORT had numerous incriminating documents in his possession, as he knew at the time. The Federal Bureau of Investigation conducted a court-authorized search of MANAFORT’S home in Virginia in the summer of 2017. The documents attached hereto as Government Exhibits 503, 504, 517, 532, 594, 604, 606, 616, 691, 692, 697, 706 and 708, among numerous others, were all documents that MANAFORT had in his possession (and were found in the search) and all pre-dated the November 2016 letter.

#### **B. Money Laundering Conspiracy**

36. In or around and between 2006 and 2016, MANAFORT, together with others, did

knowingly and intentionally conspire (a) to conduct financial transactions, affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, to wit, felony violations of FARA in violation of Title 22, United States Code, Sections 612 and 618, knowing that the property involved in the financial transactions represented proceeds of some form of unlawful activity, with intent to engage in conduct constituting a violation of sections 7201 and 7206 of the Internal Revenue Code of 1986; and (b) to 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 specified unlawful activity, to wit: a felony violation of FARA, in violation of Title 22, United States Code, Sections 612 and 618, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(ii) and (a)(2)(A).

37. MANAFORT caused the following transfers to be made, knowing that they were being made to entities to carry on activities that were required to be timely reported under the Foreign Agents Registration Act, but were not:

Payee	Date	Payer	Originating Bank Account	Country of... Origin	Destination	Amount (USD)
Company A	8/2/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$270,000.00
	10/10/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$90,000.00
	11/16/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$120,000.00
	11/20/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$182,968.07
	12/21/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$25,000.00
	3/15/2013	Bletilla Ventures Ltd.	Hellenic Bank Account -2501	Cyprus	US	\$90,000.00
	9/18/2013	Global Endeavour Inc.	Loyal Bank Limited Account -1840	SVG*	US	\$135,937.37



Payee	Date	Payer	Originating Bank Account	Country of... Origin	Destination	Amount (USD)
	10/31/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$167,689.40
	3/28/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$135,639.65
	4/3/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$82,979.93
<b>Total Company A Transfers</b>						<b>\$1,300,214.42</b>
Company B	5/30/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$130,000.00
	8/2/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$195,000.00
	10/10/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$130,000.00
	11/16/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$50,000.00
	12/21/2012	Bletilla Ventures Ltd.	Bank of Cyprus Account -0480	Cyprus	US	\$54,649.51
	3/15/2013	Bletilla Ventures Ltd.	Hellenic Bank Account -2501	Cyprus	US	\$150,000.00
	9/3/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$175,857.51
	10/31/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$195,857.51
	3/12/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$26,891.78
	3/21/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$138,026.00
	4/15/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$4,728.81
	4/25/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$4,739.23
<b>Total Company B Transfers</b>						<b>\$1,255,750.35</b>



Payee	Date	Payer	Originating Bank Account	Country of... Origin	Destination	Amount (USD)
Law Firm A	4/19/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$2,000,000.00
	5/30/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$1,000,000.00
	7/13/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$1,000,000.00
<b>Total Law Firm A Transfers</b>						<b>\$4,000,000.00</b>
<b>TOTAL TRANSFERS</b>						<b>\$6,555,964.77</b>

\* SVG refers to St. Vincent and the Grenadines.

### C. Tax and Foreign Bank Account Conspiracy

26 U.S.C. § 7206(1)

31 U.S.C. §§ 5314 and 5322(a)

38. From 2008 through 2014, MANAFORT caused millions of dollars of wire transfers to be made from offshore nominee accounts, without paying taxes on that income. The payments were made for goods, services, and real estate. MANAFORT also hid income by denominating various overseas payments as “loans,” thereby evading payment of any taxes on that income by MANAFORT.

39. MANAFORT directly and through Gates repeatedly misled his bookkeeper and tax accountants, including by not disclosing Manafort’s overseas accounts and income. Further, MANAFORT and Gates, acting at Manafort’s instruction, classified overseas payments made to MANAFORT falsely as “loans” to avoid incurring additional taxes on the income.

40. MANAFORT owned and controlled a range of foreign bank accounts in Cyprus, the Grenadines, and the United Kingdom. MANAFORT directly and through Gates maintained these accounts, including by managing them and by making substantial transfers from the accounts to both himself and vendors for personal items for him and his family. MANAFORT was aware that many of these accounts held well in excess of \$10,000 in the aggregate at some point during each year in which they existed. MANAFORT did not report the accounts’ existence to his bookkeeper

and his tax preparers in an effort to hide them, and to allow him to avoid disclosing their existence on an FBAR filing.

41. MANAFORT was aware at the time that it was illegal to hide income from the Internal Revenue Service (IRS) by failing to account for reportable income on his income tax returns. MANAFORT was also aware that it was illegal to fail to report information to the IRS regarding the existence of foreign bank accounts, as required by Schedule B of the IRS Form 1040. MANAFORT also understood at the time that a U.S. person who had a financial interest in, or signature or other authority over, a bank account or other financial account in a foreign country, which exceeded \$10,000 in any one year (at any time during that year), was required to report the account to the Department of the Treasury. MANAFORT also understood, after 2010, that the failure to make such a report constituted a crime.

42. Knowing the existence of his reportable foreign accounts and hidden income, MANAFORT knowingly, intentionally, and willfully filed and conspired to file false tax returns from 2006-2015 in that he said he did not have reportable foreign bank accounts when he knew that he did, he did not report income that he knew he in fact had earned, and he did not file Foreign Bank Account Reports. MANAFORT failed to report over \$15 million in income during the period 2010-2014.

#### **FORFEITURE**

43. The following assets constitute or were derived from proceeds of MANAFORT's conspiracy to violate the Foreign Agents Registration Act and/or they constitute property involved in MANAFORT's conspiracy to launder money in violation of 18 U.S.C. § 1956 or are traceable thereto and/or they represent substitute assets for such property which has been made unavailable for forfeiture by the acts or omissions of MANAFORT:

- a) The real property and premises commonly known as 377 Union Street, Brooklyn, New

- York 11231 (Block 429, Lot 65), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
- b) The real property and premises commonly known as 29 Howard Street, #4D, New York, New York 10013 (Block 209, Lot 1104), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
  - c) The real property and premises commonly known as 174 Jobs Lane, Water Mill, New York 11976, including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
  - d) All funds held in account number XXXXXX0969 at The Federal Savings Bank, and any property traceable thereto;
  - e) All funds seized from account number XXXXXX1388 at Capital One N.A. and any property traceable thereto;
  - f) All funds seized from account number XXXXXX9952 at The Federal Savings Bank and any property traceable thereto;
  - g) Northwestern Mutual Universal Life Insurance Policy and any property traceable thereto;
  - h) The real property and premises commonly known as 123 Baxter Street, #5D, New York, New York 10016 in lieu of 1046 N. Edgewood Street; and
  - i) The real property and premises commonly known as 721 Fifth Avenue, #43G, New York, New York 10022 in lieu of all funds from account number at Charles Schwab & Co. Inc., and any property traceable thereto.

**Count Two: Witness Tampering Conspiracy (18 U.S.C. § 371)**

44. From in or about and between February 23, 2018, and April 2018, both dates being approximate and inclusive, within the District of Columbia and elsewhere, the defendant PAUL J.

MANAFORT, JR., together with others, including Konstantin Kilimnik, 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, in violation of 18 U.S.C. § 1512(b)(1). The facts set forth with respect to Count One are incorporated herein.

45. On February 22, 2018, MANAFORT was charged in the District of Columbia in a Superseding Indictment that for the first time included allegations about the Hapsburg Group and MANAFORT's use of that group to lobby illegally in the United States in violation of the Foreign Agent Registration Act. MANAFORT knew that the Act prescribed only United States lobbying. Immediately after February 22, 2018, MANAFORT began reaching out directly and indirectly to Persons D1 and D2 to induce them to say falsely that they did not work in the United States as part of the lobbying campaign, even though MANAFORT then and there well knew that they did lobby in the United States.

46. MANAFORT committed the following overt acts directly and through his conspirators.

Date/Time*	Sender	Receiver	Event
<i>MANAFORT contacted Person D1 by phone and a messaging application:</i>			
2/24/2018; 15:51 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
2/24/2018; 15:51 (UTC)	MANAFORT	Person D1	Phone call: 1 min, 24 second call.
2/24/2018; 15:53 (UTC)	MANAFORT	Person D1	Text: "This is paul"
2/25/2018; 18:41 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
2/26/2018; 23:56 (UTC)	MANAFORT	Person D1	Text: "http://www.businessinsider.com/former-european-leaders-manafort-hapsburg-group-2018-2?r=UK&IR=T"

Date/Time*	Sender	Receiver	Event
2/26/2018; 23:57 (UTC)	MANAFORT	Person D1	Text: "We should talk. I have made clear that they worked in Europe."
2/27/2018; 11:03 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
2/27/2018; 11:31 (UTC)	MANAFORT	Person D1	Phone call (attempted): No duration.
<i>Kilimnik contacted Person D2 a messaging application, sending four messages:</i>			
2/28/2018; 01:49 (CEST)	Kilimnik	Person D2	"[Person D2], hi! How are you? Hope you are doing fine. ;))"
2/28/2018; 01:51 (CEST)	Kilimnik	Person D2	"My friend P is trying to reach [Person D1] to brief him on what's going on."
2/28/2018; 01:51 (CEST)	Kilimnik	Person D2	"If you have a chance to mention this to [Person D1] - would be great"
2/28/2018; 01:53 (CEST)	Kilimnik	Person D2	"Basically P wants to give him a quick summary that he says to everybody (which is true) that our friends never lobbied in the US, and the purpose of the program was EU"
<i>Kilimnik contacted Person D2 using a different messaging application, sending five messages:</i>			
2/28/2018; 06:01 (CEST)	Kilimnik	Person D2	"Hey, how are you? This is K."
2/28/2018; 06:01(CEST)	Kilimnik	Person D2	"Hope you are doing fine."
2/28/2018; 06:01 (CEST)	Kilimnik	Person D2	"My friend P is trying to reach [Person D1] to brief him on what's going on"
2/28/2018; 06:02 (CEST)	Kilimnik	Person D2	"Basically P wants to give him a quick summary that he says to everybody (which is true) that our friends never lobbied in the US, and the purpose of the program was EU"

Date/Time*	Sender	Receiver	Event
2/28/2018; 06:03 (CEST)	Kilimnik	Person D2	"If you have a chance to mention this to [First Initial of Person D1's Name]. - it would be great. It would be good to get them connected to discuss in person. P is his friend."
<i>Kilimnik contacted Person D2 using two different applications, sending three messages:</i>			
4/4/2018; 08:53 (CEST)	Kilimnik	Person D2	"Hey. This is Konstantin. My friend P asked me again to help connect him with [Person D1]. Can you help?"
4/4/2018; 08:54 (CEST)	Kilimnik	Person D2	"Hey. My friend P has asked me again if there is any way to help connect him through [Person D1]"
4/4/2018; 08:54 (CEST)	Kilimnik	Person D2	"I tried him on all numbers."
<i>Kilimnik contacted Person D1 using a messaging application:</i>			
4/4/2018; 13:00 (UTC)	Kilimnik	Person D1	"Hi. This is K. My friend P is looking for ways to connect to you to pass you several messages. Can we arrange that."

\*UTC and CEST refer to Coordinated Universal Time and Central European Summer Time, respectively.

### Other Acts

#### I. **Bank/Bank Fraud Conspiracy** **18 U.S.C. §§ 1344 and 1349**

#### **Bank Fraud Conspiracy / Citizens Bank / \$3.4 million loan** **(Charged as Count 24 in the Eastern District of Virginia Superseding Indictment)**

47. Between December 2015 and March 2016, MANAFORT conspired to intentionally defraud Citizens Bank in connection with his application for a mortgage for approximately \$3.4 million. The mortgage related to a condominium on Howard Street in the Soho neighborhood of Manhattan, New York. During the course of the conspiracy, MANAFORT made and caused to be made, a series of false and fraudulent representations to the bank in order to secure the loan, including the



following: (a) MANAFORT falsely represented the amount of debt he had by failing to disclose on his loan application the existence of a mortgage on his Union Street property (from Genesis Capital); (b) MANAFORT caused an insurance broker to provide Citizens Bank false information, namely, an outdated insurance report that did not list the Union Street loan (from Genesis Capital); (c) MANAFORT falsely stated that a \$1.5 million Peranova loan had been forgiven in 2015; and (d) MANAFORT falsely represented to the lender and its agents that the Howard Street property was a secondary home used as such by his daughter and son-in-law and was not held as a rental property. These statements were material to Citizens Bank.

48. Citizens Bank was a financial institution chartered by the United States.

**Bank Fraud Conspiracy / Banc of California / \$1 million loan  
(Charged as Count 26 in the Eastern District of Virginia Superseding Indictment)**

49. In approximately February 2016, MANAFORT conspired to intentionally defraud Banc of California in connection with his application for a business loan. During the course of the conspiracy, MANAFORT made and caused to be made a series of false and fraudulent representations to the bank, including the following: (a) the submission of a false statement of assets and liabilities that failed to disclose a loan on the Union Street property (from Genesis Capital) and misrepresented, among other things, the amount of the mortgage on the Howard Street property; and (b) the submission of a doctored 2015 DMI profit and loss statement (P&L) that overstated DMI's 2015 income by more than \$4 million. These statements were material to Banc of California.

50. Banc of California was a financial institution chartered by the United States.





**Bank Fraud Conspiracy / Citizens Bank / \$5.5 million loan  
(Charged as Count 28 in the Eastern District of Virginia Superseding Indictment)**

51. Between December 2015 and March 2016, MANAFORT conspired to intentionally defraud Citizens Bank in connection with his application for a mortgage for approximately \$5.5 million on a property at Union Street in Brooklyn, New York. During the course of the conspiracy, MANAFORT made or caused to be made a series of false and fraudulent material representations to the bank in order to secure the loan, including the following: (a) the submission of a false statement of assets and liabilities that hid a prior loan on the Union Street property (from Genesis Capital), among other liabilities; and (b) the submission of a falsified 2016 DMI P&L that overstated DMI's income by more than \$2 million.

**Bank Fraud/Bank Fraud Conspiracy / The Federal Savings Bank / \$9.5 million loan & \$6.5 million loan  
(Charged in Counts 29, 30, 31 & 32 in the Eastern District of Virginia Superseding Indictment)**

52. Between April 2016 and January 2017, MANAFORT conspired to intentionally defraud, and did defraud, The Federal Savings Bank in connection with his applications for the following two loans: (a) a loan for approximately \$9.5 million related to various properties, including a house in Bridgehampton, New York, and (b) a loan for approximately \$6.5 million related to his Union Street property. During the course of the fraudulent scheme, MANAFORT made and caused to be made a series of false and fraudulent material representations to the bank in order to secure both loans, including the following: (a) MANAFORT provided the bank with doctored P&Ls for DMI for both 2015 and 2016, overstating its income by millions of dollars; and (b) MANAFORT falsely represented to The Federal Savings Bank that he had lent his credit card to a friend who had incurred more than \$200,000 in charges relating to the purchase of Yankee tickets.

53. Both loans were extended by The Federal Savings Bank.

54. The Federal Savings Bank was a financial institution chartered by the United States.

ROBERT S. MUELLER, III  
Special Counsel

By:



Andrew Weissmann  
Jeannie S. Rhee  
Greg D. Andres  
Kyle R. Freeny  
Senior/Assistant Special Counsels




DEFENDANT'S ACCEPTANCE

I have read every page of this Agreement and have discussed it with my attorneys Kevin Downing, Thomas Zehnle, and Richard Westling. I am fully satisfied with the legal representation by them, who I have chosen to represent me herein. Nothing about the quality of the representation of other counsel is affecting my decision herein to plead guilty. I fully understand this Agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Agreement fully. I am pleading guilty because I am in fact guilty of the offense identified in this Agreement.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in this Agreement. I am satisfied with the legal services provided by my attorneys in connection with this Agreement and matters related to it.


Date: 9-14-18

  
Paul J. Manafort, Jr.  
Defendant

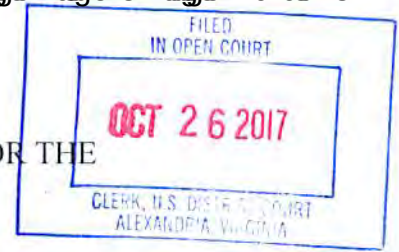
ATTORNEYS' ACKNOWLEDGMENT

I have read every page of this Agreement, reviewed this Agreement with my client, Paul J. Manafort, and fully discussed the provisions of this Agreement with my client. These pages accurately and completely set forth the entire Agreement. I concur in my client's desire to plead guilty as set forth in this Agreement.

Date: 9-14-18

  
Kevin M. Downing  
Richard W. Westling  
Thomas E. Zehnle  
Attorneys for Defendant

# EXHIBIT E



IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 1:17-CR-248
	)	
	)	Hon. T. S. Ellis, III
HYUNG KWON KIM,	)	
	)	
Defendant.	)	

PLEA AGREEMENT

Dana J. Boente, United States Attorney for the Eastern District of Virginia; Mark D. Lytle, Assistant United States Attorney; Stuart M. Goldberg, Acting Deputy Assistant Attorney General for the Tax Division, U.S. Department of Justice; Mark F. Daly, Senior Litigation Counsel and Robert J. Boudreau, Trial Attorney; the defendant, Hyung Kwon Kim; and the defendant's counsel have entered into an agreement pursuant to Rule 11 of the Federal Rules of Criminal Procedure. The terms of the agreement are as follows:

**1. Offense and Maximum Penalties**

The defendant agrees to waive indictment and plead guilty to a single count criminal information charging the defendant with willful failure to file a Report of Foreign Bank and Financial Accounts, FinCEN Report 114 (formerly TD F 90.22-1) (as applicable, "FBAR") with the Department of the Treasury, in violation of Title 31, United States Code, Sections 5314 and 5322(a), and Title 31, Code of Federal Regulations, Section 1010.350.

The maximum penalties for this offense are: a maximum term of imprisonment of five years of imprisonment; a maximum fine of the greater of \$250,000 or twice the gross gain or loss; a special assessment, pursuant to 18 U.S.C. §§ 3013 and 3014; and three years of



supervised release. The defendant understands that this supervised release term is in addition to any prison term the defendant may receive, and that a violation of a term of supervised release could result in the defendant being returned to prison for the full term of supervised release.

## **2. Factual Basis for the Plea**

The defendant will plead guilty because the defendant is in fact guilty of the charged offense. The defendant admits the facts set forth in the Statement of Facts filed with this plea agreement and agrees that those facts establish guilt of the offense charged beyond a reasonable doubt. The Statement of Facts, which is hereby incorporated into this plea agreement, constitutes a stipulation of facts for purposes of Section 1B1.2(a) of the U.S. Sentencing Commission’s Sentencing Guidelines Manual (“Sentencing Guidelines”).

## **3. Assistance and Advice of Counsel**

The defendant is satisfied that his attorneys have rendered effective assistance. The defendant understands that by entering into this plea agreement, he surrenders certain rights as provided in this plea agreement. The defendant understands that the rights of criminal defendants include the following:

- a. the right to plead not guilty and to persist in that plea;
- b. the right to a jury trial;
- c. the right to be represented by counsel – and, if necessary, have the Court appoint counsel – at trial and at every other stage of the proceedings; and
- d. the right at trial to confront and to cross-examine adverse witnesses, to be protected from compelled self-incrimination, to testify and present evidence, and to compel the attendance of witnesses.

#### 4. Role of the Court and the Probation Office

The defendant understands that the Court has jurisdiction and authority to impose any sentence within the statutory maximum described above but that the Court will determine his actual sentence in accordance with 18 U.S.C. § 3553(a). The defendant understands that the Court has not yet determined a sentence and that any estimate of the advisory sentencing range under the Sentencing Guidelines he may have received from his counsel, the United States, or the Probation Office, is a prediction, not a promise, and is not binding on the United States, the Probation Office, or the Court. Additionally, pursuant to the Supreme Court's decision in *United States v. Booker*, 543 U.S. 220 (2005), the Court, after considering the factors set forth in 18 U.S.C. § 3553(a), may impose a sentence above or below the Sentencing Guidelines' advisory sentencing range, subject only to review by higher courts for reasonableness. The United States makes no promise or representation concerning what sentence the defendant will receive, and he cannot withdraw a guilty plea based upon the actual sentence.

#### 5. Sentencing Guidelines

The Government contends that the applicable Guideline in this matter should be U.S.S.G. § 2S1.3(a)(2), § 2B1.1, and § 2S1.3(b)(2) because the defendant filed two false FBARs and a false U.S. Individual Income Tax Return, Form 1040, within a 12-month period. However, at the time that the defendant agreed to plead guilty, the Government consistently took the position with similarly situated defendants that the applicable Guideline was U.S.S.G. § 2T1.1 and § 2T1.4 due to the cross reference in 2S1.3(c)(1).

Therefore, in order to ensure that the defendant receives equitable treatment, and in accordance with Federal Rule of Criminal Procedure 11(c)(1)(B), the United States and the



defendant will recommend to the Court that the following provisions of the Sentencing Guidelines apply:

- a. The base offense level for this offense is 16 pursuant to U.S.S.G. § 2T1.1(a)(1) and § 2T4.1(F), because the tax loss exceeded \$100,000;
- b. The base offense level is increased by 2 levels pursuant to U.S.S.G. § 2T1.1(b)(2) because the offense involved sophisticated means; and
- c. the parties agree that they are free to argue other provisions of the Sentencing Guidelines not referenced herein or the sentencing factors under 18 U.S.C. § 3553(a).

The United States and the defendant also agree that he has assisted the government in the investigation and prosecution of his own misconduct by timely notifying authorities of his intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the Court to allocate their resources efficiently. If the defendant qualifies for a two-level decrease in offense level pursuant to Sentencing Guidelines § 3E1.1(a) and the offense level prior to the operation of that section is 16 or greater, the government agrees to file, pursuant to Sentencing Guidelines § 3E1.1(b), a motion prior to, or at the time of, sentencing for an additional one-level decrease in the defendant's offense level.

#### **6. Waiver of Appeal, FOIA, Privacy Act Rights, Venue and Statute of Limitations**

The defendant also understands that 18 U.S.C. § 3742 affords him the right to appeal the sentence imposed. Nonetheless, the defendant knowingly waives the right to appeal the conviction and any sentence within the statutory maximum described above (or the manner in which that sentence was determined) on the grounds set forth in 18 U.S.C. § 3742 or on any ground whatsoever other than an ineffective assistance of counsel claim that is cognizable on

direct appeal, in exchange for the concessions made by the United States in this plea agreement. This plea agreement does not affect the rights or obligations of the United States as set forth in 18 U.S.C. § 3742(b).

The defendant hereby waives all rights, whether asserted directly or by a representative, to request or receive from any department or agency of the United States any records pertaining to the investigation or prosecution of this case, including without limitation any records that may be sought under the Freedom of Information Act, 5 U.S.C. § 552, or the Privacy Act, 5 U.S.C. § 552a.

The defendant knowingly waives all rights to the venue requirement for Count One of the Information due to the fact that venue for the crimes committed lies in any other Federal judicial district, and the defendant further agrees to be prosecuted for this charge in the Eastern District of Virginia.

The defendant knowingly waives all rights to raise any defense based on the failure of a federal grand jury or the United States to charge him with the offense described in paragraph 1 of this agreement within any applicable statute of limitations.

#### **7. Special Assessment**

Before sentencing in this case, the defendant agrees to pay a mandatory special assessment of one hundred dollars (\$100.00).

#### **8. Payment of Monetary Penalties**

The defendant understands and agrees that, pursuant to 18 U.S.C. § 3613, whatever monetary penalties are imposed by the Court will be due immediately and subject to immediate enforcement by the United States as provided for in Section 3613. Furthermore, within 14 days of a request, the defendant agrees to provide all of the defendant's financial information to the



United States and the Probation Office and, if requested, to participate in a pre-sentencing debtor's examination and/or complete a financial statement under penalty of perjury. If the Court imposes a schedule of payments, the defendant understands that the schedule of payments is merely a minimum schedule of payments and not the only method, nor a limitation on the methods, available to the United States to enforce the judgment. If the defendant is incarcerated, he agrees voluntarily to participate in the Bureau of Prisons' Inmate Financial Responsibility Program, regardless of whether the Court specifically directs participation or imposes a schedule of payments.

#### **9. Restitution**

The defendant agrees to the entry of a Restitution Order for the full amount of the victim's losses pursuant to 18 U.S.C. § 3663(a)(3). Victims of the conduct, as defined by 18 U.S.C. § 3663(a)(2) and described in the charging instrument or Statement of Facts or any other document describing the defendant's conduct, shall be entitled to restitution. Without limiting the amount of restitution that the Court must impose, the parties agree that, at a minimum, the following victims have suffered the following losses:

<u>Victim Name/ Address</u>	<u>Amount of Restitution</u>
IRS- RACS Attn.: Mail Stop 6261, Restitution 333 West Pershing Avenue Kansas City, MO 64108	TBD

The parties acknowledge that determination of the loss amounts for all victims in this matter is a complicated and time consuming process. To that end, the defendant agrees, pursuant to 18 U.S.C. § 3664(d)(5), that the Court may defer the imposition of restitution until after the sentencing; however, the defendant specifically waives the 90 day provision found at 18 U.S.C.

§ 3664(d)(5) and consents to the entry of any orders pertaining to restitution after sentencing without limitation.

If the Court orders the defendant to pay restitution to the IRS for the failure to pay tax, either directly as part of the sentence or as a condition of supervised release, the IRS will use the restitution order as the basis for a civil assessment. See 26 U.S.C. § 6201(a)(4). The defendant does not have the right to challenge the amount of this assessment. See 26 U.S.C. § 6201(a)(4)(C). Neither the existence of a restitution payment schedule nor the defendant's timely payment of restitution according to that schedule will preclude the IRS from administrative collection of the restitution-based assessment, including levy and distraint under 26 U.S.C. § 6331.

#### **10. Immunity from Further Prosecution in this District**

The United States will not further criminally prosecute the defendant in the Eastern District of Virginia for the specific conduct described in the information or Statement of Facts.

#### **11. Waiver of Protections of Proffer Agreement**

The defendant agrees that all protections set forth in any proffer letter executed in relation to this case are hereby waived. The defendant further agrees that the government may use all statements provided by him, without limitation, in any proceeding brought by the government, including the Internal Revenue Service, against the defendant.

#### **12. Defendant's Cooperation**

The defendant agrees to cooperate fully and truthfully with the United States, and provide all information known to him regarding any criminal activity as requested by the government. In that regard:



a. The defendant agrees to appear for and testify truthfully and completely at any grand juries, trials or other proceedings.

b. The defendant agrees to be reasonably available for debriefings, meetings, and pre-trial conferences as the United States may require.

c. The defendant agrees to provide all documents, records, writings, or materials of any kind in the defendant's possession or under his care, custody, or control relating directly or indirectly to all areas of inquiry and investigation. Nothing in this plea agreement requires the defendant to waive any valid assertion of the attorney client privilege as to counsel advising him in connection with this investigation or any related proceeding.

d. The defendant agrees that, at the request of the United States, he will voluntarily submit to polygraph examinations, and that the United States will choose the polygraph examiner and specify the procedures for the examinations.

e. The defendant agrees that the Statement of Facts is limited to information necessary to support the plea. The defendant will provide more detailed facts relating to this case during ensuing debriefings.

f. The defendant agrees to execute any and all instructions and authorizations to direct individuals, entities, or financial institutions to provide account documents and information as well as to repatriate funds held by foreign financial institutions in order to accomplish the terms and conditions of this plea agreement.

g. The defendant acknowledges that he is hereby on notice that he may not violate any federal, state, or local criminal law while cooperating with the government, and that the government will, in its discretion, consider any such violation in evaluating whether to file a motion for a downward departure or reduction of sentence.

h. Nothing in this plea agreement places any obligation on the government to seek the defendant's cooperation or assistance.

**13. Use of Information Provided by the Defendant under this Plea Agreement.**

The United States will not use any truthful information provided pursuant to this plea agreement in any criminal prosecution against the defendant in the Eastern District of Virginia, except in any prosecution for a crime of violence or conspiracy to commit, or aiding and abetting, a crime of violence (as defined in 18 U.S.C. § 16). Pursuant to Sentencing Guidelines §1B1.8, no truthful information that the defendant provides under this plea agreement will be used in determining the applicable Sentencing Guidelines advisory sentencing range, except as provided in §1B1.8(b). Nothing in this plea agreement, however, restricts the Court's or Probation Officer's access to information and records in the possession of the United States. Furthermore, nothing in this plea agreement prevents the government in any way from prosecuting the defendant should he knowingly provide false, untruthful, or perjurious information or testimony, or from using information provided by the defendant in furtherance of any forfeiture action, whether criminal or civil, administrative or judicial. The United States will bring this plea agreement and the full extent of the defendant's cooperation to the attention of other prosecuting offices if requested.

**14. Defendant Must Provide Full, Complete and Truthful Cooperation**

This plea agreement is not conditioned upon charges being brought against any other individual. This plea agreement is not conditioned upon any outcome in any pending investigation. This plea agreement is not conditioned upon any result in any future prosecution which may occur because of the defendant's cooperation. This plea agreement is not conditioned upon any result in any future grand jury presentation or trial involving charges



resulting from this investigation. This plea agreement is conditioned upon the defendant providing full, complete and truthful cooperation.

#### **15. Motion for a Downward Departure**

The parties agree that the United States reserves the right to seek any departure from the applicable Sentencing Guidelines advisory sentencing range, pursuant to § 5K1.1 of the Sentencing Guidelines and Policy Statements, or any reduction of sentence pursuant to Federal Rule of Criminal Procedure 35(b), if, in its sole discretion, the United States determines that such a departure or reduction of sentence is appropriate.

#### **16. Payment of Taxes and Filing of Tax Returns**

The defendant consents to any motion by the United States, under Federal Rule of Criminal Procedure 6(e)(3)(E), to disclose grand jury material to the Internal Revenue Service (“IRS”) for use in computing and collecting his taxes, interest and penalties, and to the civil and forfeiture sections of the United States Attorney’s Office for use in identifying assets and collecting fines and restitution. The defendant also agrees to file true and correct Amended U.S. Individual Income Tax Returns, Forms 1040X, for the years 2003 through 2010 and to pay all taxes, interest and penalties for the years 2003 through 2010, prior to sentencing, as will be agreed upon between him and the IRS, or as otherwise imposed or assessed by the IRS. The defendant also admits that he willfully failed to file a true and accurate FBAR for each required year 2003 through 2010, and agrees not to object to the assessment of fraud penalties pursuant to 26 U.S.C. § 6663. The defendant further agrees to make all books, records and documents available to the IRS for use in computing his taxes, interest and penalties for the years 1999 through 2010.



**17. Penalty Related to filing False and Fraudulent FBARs**

The defendant agrees that in order to resolve his civil liability for both willfully failing to file FBARs and for willfully filing false and fraudulent FBARs for years 1999 through 2010, he will pay a civil penalty in the amount of \$14,075,862 (fourteen million, seventy-five thousand, eight hundred and sixty-two dollars), equaling 50% of the total assets that the Defendant held in his undeclared accounts in Switzerland on December 31, 2004, no later than ten (10) days after the entry of Judgment in this case. The defendant further agrees to cause the transfer of the funds by electronic funds transfer pursuant to written instructions to be provided by the Financial Litigation Unit of the United States Attorney's Office for the Eastern District of Virginia. The defendant further agrees to cooperate with the United States, and make best efforts to transfer and remit the funds, including taking all steps requested by any financial institution or the United States, including the execution of all documents, orders, and/or instructions directing persons or entities acting on his behalf or in the name of nominee holders of accounts on his behalf, providing any information requested to facilitate the transfer, and granting access to information to facilitate the transfer. The defendant understands and agrees that nothing in paragraphs 15 and 16 of, or otherwise in, this plea agreement shall preclude or limit the IRS in its civil determination, assessment, or collection of any taxes, interest and/or penalties that he may owe.

The defendant agrees to file with the Financial Crimes Enforcement Network of the Department of the Treasury true and correct FBARs, including amended FBARs as needed, for 1999 through 2010.

**18. Breach of this Plea Agreement and Remedies**

This plea agreement is effective when signed by the defendant, his attorney, and an attorney for the United States. The defendant agrees to entry of this plea agreement at the date

and time scheduled with the Court by the United States (in consultation with his attorney). If the defendant withdraws from this plea agreement, or commits or attempts to commit any additional federal, state or local crimes, or intentionally gives materially false, incomplete, or misleading testimony or information, or otherwise violates any provision of this plea agreement, then:

a. The United States will be released from its obligations under this plea agreement, including any obligation to seek a downward departure or a reduction in sentence.

The defendant, however, may not withdraw the guilty plea entered pursuant to this plea agreement.

b. The defendant will be subject to prosecution for any federal criminal violation, including, but not limited to, perjury and obstruction of justice, that is not time-barred by the applicable statute of limitations on the date this plea agreement is signed.

Notwithstanding the subsequent expiration of the statute of limitations, in any such prosecution, the defendant agrees to waive any statute-of-limitations defense.

c. Any prosecution, including the prosecution that is the subject of this plea agreement, may be premised upon any information provided, or statements made, by the defendant, and all such information, statements, and leads derived therefrom may be used against the defendant. The defendant waives any right to claim that statements made before or after the date of this plea agreement, including the statement of facts accompanying this plea agreement or adopted by the defendant and any other statements made pursuant to this or any other agreement with the United States, should be excluded or suppressed under Federal Rule of Evidence 410, Federal Rule of Criminal Procedure 11(f), the Sentencing Guidelines or any other provision of the Constitution or federal law.



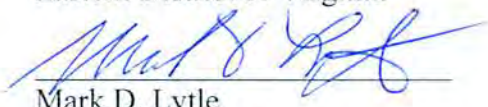
Any alleged breach of this plea agreement by either party shall be determined by the Court in an appropriate proceeding at which the defendant's disclosures and documentary evidence shall be admissible and at which the moving party shall be required to establish a breach of the plea agreement by a preponderance of the evidence. The proceeding established by this paragraph does not apply, however, to the decision of the United States whether to file a motion based on "substantial assistance" as that phrase is used in Federal Rule of Criminal Procedure 35(b) and Section 5K1.1 of the Sentencing Guidelines and Policy Statements. The defendant agrees that the decision whether to file such a motion rests in the sole discretion of the United States.

#### 19. Nature of this Plea Agreement and Modifications

This written plea agreement constitutes the complete plea agreement between the United States, the defendant, and his counsel. The defendant and his attorney acknowledge that no threats, promises, or representations have been made, nor agreements reached, other than those set forth in writing in this plea agreement, to cause him to plead guilty. Any modifications of this plea agreement shall be valid only as set forth in writing in a supplemental or revised plea agreement signed by all parties.

Dana J. Boente  
United States Attorney  
Eastern District of Virginia

By:

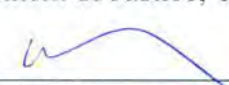
  
Mark D. Lytle  
Assistant United States Attorney

Date:

10/26/2017

Stuart M. Goldberg  
Acting Deputy Assistant Attorney General  
Department of Justice, Tax Division


By:

  
Mark F. Daly  
Senior Litigation Counsel  
Robert J. Boudreau  
Trial Attorney

Date:


10/26/2017

Defendants Signature: I hereby agree that I have consulted with my attorney and fully understand all rights with respect to the pending criminal information. Further, I fully understand all rights with respect to Title 18, United States Code, Section 3553 and the provisions of the Sentencing Guidelines that may apply in my case. I have read this plea agreement and carefully reviewed every part of it with my attorney. I understand this plea agreement and voluntarily agree to it.

  
Hyung Kwon Kim  
Defendant

Date: October 26 2017

Defense Counsel Signature: I am counsel for the defendant in this case. I have fully explained the defendant's rights to him with respect to the pending information. Further, I have reviewed Title 18, United States Code, Section 3553 and the Sentencing Guidelines, and I have fully explained to the defendant the provisions that may apply in this case. I have carefully reviewed every part of this plea agreement with the defendant. To my knowledge, the defendant's decision to enter into this agreement is an informed and voluntary one.

  
Mark E. Matthews  
Charles Myungsik Yoon  
Counsel for the Defendant

Date: October 26, 2017

# EXHIBIT F

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:17-CR-00248
	)	
HYUNG KWON KIM,	)	Honorable T. S. Ellis III
	)	
Defendant.	)	Sentencing: January 25, 2018
	)	4:00 p.m.

POSITION OF THE UNITED STATES WITH RESPECT TO SENTENCING

The United States hereby submits its position on the sentencing of the defendant Hyung Kwon Kim (“defendant” or “Kim”) in accordance with U.S.S.G. §6A1.2 and the policy of this Court. As explained below, while the government agrees with the Probation Office’s calculation of the sentencing range the advisory Sentencing Guidelines, the government nevertheless believes that the appropriate Guidelines range that should be applied in this case is that agreed upon by the parties, as set forth in the plea agreement. Taking into account the factors set forth in 18 U.S.C. § 3553(a) and the government’s filing under seal, the government makes a final sentencing recommendation of nine (9) months of imprisonment, three (3) years of supervised release, an appropriate fine, and a \$100 special assessment.

**I. Background**

**A. Offense Conduct**

Hyung Kim is a highly educated and sophisticated executive. Born into affluence, he had the good fortune to inherit staggering sums. The vast sums Kim secreted in a series of secret Swiss accounts are of import here. At one point, in 2004, the windfall stashed in Switzerland

swelled to over \$28 million. Kim engaged in a series of schemes and ruses to conceal the funds from the IRS, violate reporting requirements, and evade taxes.

Kim first opened an account in his own name at Credit Suisse AG in Switzerland in October 1998. He funded that account, as well as other additional accounts that he opened at Credit Suisse, its wholly owned subsidiaries (including Bank Leu, Bank Hofmann, and Clariden Leu), and UBS AG, with funds inherited from a foreign relative.

In November 2000, Kim took the first of many steps to mask his ownership and control of the offshore funds. At the advice and with the assistance of his co-conspirator Edgar Paltzer, an attorney practicing in Switzerland, Kim opened an account at Bank Leu in the name of a sham entity called Daroka Overseas. In February 2002, he opened a second account, at Bank Hofmann, in the name of the same entity. By placing his assets in accounts held in the name of a nominee, Kim made it appear that the offshore funds belonged to a corporate entity, not him.

Kim controlled the assets in the account by meeting with the bankers and his attorney in in Switzerland and the United States as well as communicating with them via email, fax, and phone. Further, he hosted one of his Swiss bankers at his homes in the U.S. where the banker vacationed with his family and used Kim's residence as a base to travel to meet with his other clients.

Wires from afar flowed into these accounts. By the close of 2004, the balance of his accounts exceeded \$28 million. Kim did not expend these funds on necessities. Instead, Kim used assets in the accounts to fund a lavish lifestyle. The Statement of Facts and PSR discuss Kim's expenditures in detail. However, a summary of the spending is helpful to understand the magnitude of the wealth that Kim concealed:



- Between 2003 and 2007, Kim spent over \$3 million from his Swiss accounts to purchase his residence in Greenwich, Connecticut. Kim and Paltzer took efforts to conceal that Kim controlled the funds in the Swiss accounts. When Kim communicated with Paltzer, he used coded language. In turn, Paltzer directed Credit Suisse to issue a check for \$1.76 million from Credit Suisse First Boston, its U.S. bank, so that it appeared that Kim tapped a domestic source of funds.
- In 2005, Kim spent almost \$5 million from his Swiss accounts to purchase a summer home on Cape Cod. While the price was significant, what is most relevant are the machinations undertaken by Kim and Paltzer to conceal Kim's ownership of the Swiss accounts and the summer home itself. Paltzer formed a new sham entity, Edraith Invest & Finance, to hold title to the home as well as a Swiss account. Paltzer and Kim pretended that Kim merely leased the home in an arms-length transaction from a third party. They drafted and executed fake leases. They exchanged emails in which they discussed the wishes of the "owners."
- Between 2003 and 2008, Kim used over \$5 million from his Swiss accounts to purchase jewels and jewelry, including the following items: a 11.6 carat diamond ring; a 10.5 carat yellow diamond ring and jewelry setting; a 8.6 carat ruby ring; a 8.4 carat emerald ring; a 7.15 carat diamond ring; and pearls.
- Between 2000 and 2008, Kim withdrew over \$500,000 when traveling in Switzerland to fund his personal expenses.

Kim had the opportunity to bring his remaining assets to the United States in 2008, in the midst of the Department of Justice's investigation of UBS AG for aiding and assisting U.S. taxpayers to evade their taxes. At that time, Credit Suisse had advised Paltzer and Kim that it

intended to close the Daroka Overseas and Edraith accounts as part of its initiative to minimize the bank's exposure by closing accounts held by U.S. residents in the names of nominee entities. Fully aware that Kim's undeclared assets could not stay at Credit Suisse, Paltzer and Kim reviewed Kim's options: to report his previously undeclared assets and income to the IRS; to end his crimes by spending the assets; or to continue the concealment by transferring his assets to another bank. Kim chose to keep the money offshore, albeit at Bank Frey, a smaller Swiss bank that considered itself immune from U.S. law enforcement as it deliberately maintained no physical presence in the United States.<sup>1</sup>

With the assistance of Paltzer, Kim opened accounts at Bank Frey in the names of Daroka Overseas and Edraith in December 2008. He deposited into those accounts the remaining assets from his accounts at Credit Suisse's subsidiaries. Paltzer advised Kim to take further precautions to prevent detection, by limiting emails and phone communications from the U.S. and meeting in third countries, such as France or Italy.

Kim maintained the accounts at Bank Frey until 2011. At that time, he elected not to report the funds, but to bring the assets to the United States in a covert manner by paying a

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<sup>1</sup> In September 2008, as corroborated by the Internet Wayback Machine, Bank Frey's web site contained the following statements:

"An important reason for founding Bank Frey was to provide our clients with the services of a Bank that is - and always will remain - truly Swiss," Dr. Markus A. Frey says.

As a result, Bank Frey follows a strict policy to never open any branch or other representation outside the reach of the Swiss laws and jurisdiction. We strongly believe that only by remaining a true Swiss banking institution, we can guarantee to act in accordance with the Swiss standards of political stability, acting in good faith and an unbroken sense for independent neutrality.

Dr. Markus A. Frey continues, "Bank Frey is and will remain truly Swiss. Only that way can we be certain to maintain our values - and assure that no foreign authority will ever 'bully' us into giving them up".

See "A True Swiss Bank", available at [https://web.archive.org/web/20080915012232/http://www.bank-frey.com:80/index.php?option=com\\_content&task=view&id=27&Itemid=55](https://web.archive.org/web/20080915012232/http://www.bank-frey.com:80/index.php?option=com_content&task=view&id=27&Itemid=55). Bank Frey announced that it would cease operations in October 2013.

jeweler in Switzerland for jewels and jewelry purchased in the United States. Kim arranged the sales by mailing packages of gifts to the children of his former banker. Kim hid handwritten transfer instructions within those packages. Between March and August 2011, Kim spent a total of \$3.6 million in two separate transactions to purchase a ring with a sapphire weighing 13.9 carats and three loose diamonds weighing 5.02, 4.03 and 4.17 carats.

Kim concealed his offshore assets from his accountants. Indeed, although the defendant filed FBARs in 2005, 2006, 2007, and 2008 (for calendar years 2004 through 2007) on which he reported accounts that he owned in South Korea, he never once reported his Swiss accounts. Further, Kim also filed false income tax returns on which he underreported his income and failed to report his ownership of the Swiss accounts.

Kim did not earn substantial amounts of taxable income from the assets in the Swiss accounts. From 2001 through 2010, the combined federal and state income tax loss amounted to \$243,542. Indeed, the millions of dollars in capital losses that Kim incurred as a product of his ill-advised investing swamped his investment gains.

## II. Sentencing Argument

Although the Supreme Court rendered the federal Sentencing Guidelines advisory in *United States v. Booker*, 543 U.S. 220 (2005), “a sentencing court is still required to ‘consult [the] Guidelines and take them into account when sentencing.’” *United States v. Clark*, 434 F.3d 684, 685 (4th Cir. 2006) (quoting *Booker*, 543 U.S. at 264). The Supreme Court has directed district courts to “begin all sentencing proceedings by correctly calculating the applicable Guidelines range.” *Gall v. United States*, 552 U.S. 38, 49 (2007). The sentencing court, however, “may not presume that the Guidelines range is reasonable.” *Nelson v. United States*, 555 U.S. 350, 352 (2009). The “Guidelines should be the starting point and the initial

benchmark,” but the sentencing court must also “consider all of the § 3553(a) factors” in determining the appropriate sentence. *Id.*; *see also Clark*, 434 F.3d at 685. Ultimately, the sentence imposed must meet a standard of reasonableness. *See Booker*, 543 U.S. at 260-61.

## **A. Guidelines Range**

### **1. The Applicable Guidelines Provisions**

The defendant pled guilty to the willful failure to file an FBAR, in violation of 31 U.S.C. Sections 5314 and 5322. The offense of conviction in this case falls under U.S.S.G. § 2S1.3. The Probation Office calculated the Guidelines range under U.S.S.G. § 2S1.3(a)(2) (the “Part-S Guidelines”). *See* Presentence Investigation Report, ¶¶ 76-85. That provision includes a cross-reference to the theft and fraud Guidelines, and sets the base offense level as follows:

6 plus the number of offense levels from the table in § 2B1.1 (Theft, Property Destruction, and Fraud) corresponding to the value of the funds, if subsection (a)(1) does not apply.

Probation calculated the base offense level as 28. Probation added 22 levels as it placed the “value of funds” at \$28,151,724, the year-end value of the assets in the unreported accounts in 2004 (the highest year-end balance). *See* PSR, ¶¶ 65(j), 76; U.S.S.G. § 2B1.1(b)(1)(L) (more than \$25 million).

The government contends, as does Probation, that two levels should be added as the defendant “committed the offense as part of a pattern of unlawful activity involving more than \$100,000 in a 12-month period.” *See* U.S.S.G. § 2S1.3(b)(2). The Application Note to § 2S1.3 defines a pattern of illegal activity as “at least two separate occasions of unlawful activity involving a total amount of more than \$100,000 in a 12-month period, without regard to whether any such occasion occurred during the course of the offense or resulted in a conviction for the conduct that occurred on that occasion.” Kim filed false FBARs on October 14, 2007 (for 2006) and again on March 27, 2008 (for 2008). On each FBAR, Kim failed to report that he owned and

controlled any of the financial accounts in Switzerland. Kim also filed a false 2007 Individual Income Tax Return, Form 1040, on March 3, 2008, which omitted any income that Kim earned from the assets in his undeclared accounts in Switzerland. Kim's attorneys calculated that Kim omitted \$104,699 in ordinary income on the 2007 return. The filing of two false FBARs and a false return within a 12-month period qualifies as a "pattern of unlawful activity" sufficient to trigger the two-level enhancement.

While 2S1.3 may be the proper Guideline, the government respectfully requests that the Court sentence the defendant under U.S.S.G. § 2T, the Tax Guidelines. As stated in the Plea Agreement, "at the time that the defendant agreed to plead guilty, the Government consistently took the position with similarly situated defendants that the applicable Guideline was U.S.S.G. § 2T1.1 and § 2T1.4 due to the cross reference in § 2S1.3(c)(1)."<sup>2</sup> Plea Agreement, Dkt. # 10, pp. 3-4.

In 2012, Kim and the government commenced plea negotiations with the defendant's counsel. At that time, the government had entered into plea agreements with a number of several other legal permanent residents that required those individuals to plead guilty to FBAR charges, and not tax charges. In each of those cases, the plea agreements specifically set forth a Guidelines calculation using the Tax Guidelines and not § 2S1.3. After Kim and the government had reached an agreement in principle, the government continued to employ the Tax Guidelines in virtually every other FBAR case. In order to ensure that this defendant receives equitable treatment, the government believes that the appropriate Guidelines which should be applied *in this case* are the alternative calculation under § 2S1.3(c)(1).

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<sup>2</sup> U.S.S.G. § 2S1.3 states as follows: "If the offense was committed for the purposes of violating the Internal Revenue laws, apply the most appropriate guideline from Chapter Two, Part T (Offenses Involving Taxation) if the resulting offense level is greater than that determined above."

The base offense level for this offense is 16 pursuant to U.S.S.G. § 2T1.1(a)(1) and § 2T4.1(F), because the tax loss exceeded \$100,000. The base offense level is increased by 2 levels, pursuant to U.S.S.G. § 2T1.1(b)(2), because the offense involved sophisticated means. The defendant should receive a 3-level reduction for acceptance of responsibility resulting in a total offense level of 15. The advisory range is 18 to 24 months of imprisonment and the fine range is \$4,000 to \$40,000.

## **B. Section 3553(a) Factors**

### **1. Nature and Circumstances of the Offense, History and Characteristics of the Defendant, and the Need for Just Punishment**

Tax evasion is a serious crime, and the use of offshore accounts by U.S. taxpayers to evade their income tax obligations directly affects the ability of the Treasury to raise funds for government expenditures. In April 2016, the IRS estimated that for the years 2008-2010, the U.S. tax gap, which represented the total amount of U.S. taxes owed but not paid on time, was \$458 billion, despite an overall tax compliance rate among American taxpayers of 81.7%. *See* “Tax Gap Estimates for Tax Years 2008–2010,” report by the IRS, *available at*: <https://www.irs.gov/PUP/newsroom/tax%20gap%20estimates%20for%202008%20through%202010.pdf>. The IRS found that these updated “estimates suggest that compliance is substantially unchanged since last estimated for [tax year] 2006.” *Id.* at 2.

What sets Hyung Kim apart from many other seemingly similarly situated defendants, is the level and duration of the deception he employed to hide his assets from the IRS. For over a dozen years, the defendant employed a series of ever more aggressive schemes to conceal the windfall that he inherited. Kim utilized nine different accounts at five Swiss banks to hide his assets. For four of those accounts, the defendant used nominee entities, formed in Caribbean tax-haven countries, to add a further layer of protection. The defendant and his co-conspirator,



Paltzer, used one of those entities, Edraith Invest & Finance, to deceive a realtor and other third parties involved in the purchase of his home on Cape Cod. They went so far as to concoct a ruse whereby Kim and Paltzer exchanged emails wherein they pretended that Kim was renting the home from another family.

Kim had numerous opportunities to report his accounts and come into compliance. Each time, he chose to continue his criminal conduct. From 2004 through 2008, Kim filed FBARs on which he reported his ownership of certain accounts in South Korea. In each of those years, he had the opportunity to come clean about his Swiss accounts. He could have informed his U.S. return preparers about the Swiss accounts and sought their advice for properly reporting the ownership of the accounts and the income that he received, and pay the tax due and owing. Kim stayed silent.

In the same year that he filed his last, false FBAR, Paltzer, Kim's Swiss attorney, presented to him the option to close the accounts and bring the money to the United States. Instead, Kim chose to burrow deeper into the darkness of offshore evasion. He moved his assets to a bank that touted itself as refusing to be "bullied" by a "foreign authority," such as U.S. law enforcement.

Kim kept the funds in Switzerland for almost three more years. He continued to conceal his accounts from his return preparer and never filed FBARs during those years. In 2011, Kim again had the option to come clean and report his offshore assets. Instead, he elected to spend down the assets. Through a series of messages hidden in packages mailed from the U.S. to his former banker in Switzerland, Kim arranged to close his account by using the remaining fund to buy yet more high-end jewelry.

Given the duration of the offense, the amounts involved, the defendant's knowledge of his duty to report his foreign financial accounts, and the myriad of schemes and lies that the defendant perpetrated, a sentence of incarceration is required in order to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense.

## **2. The Need for Deterrence**

Over the past decade, the government endeavored to crack down on the use of foreign financial accounts by U.S. citizens seeking to evade the payment of their taxes. The foreign banks and institutions are more likely to aid and assist the ultra-high net worth individuals, like the defendant, to evade their taxes. Such foreign institutional assistance makes these crimes more difficult to detect, investigate and prosecute. Further, prosecutions involving offshore accounts such as this one require the government to commit significant investigative and prosecutorial resources, and the IRS typically detects the criminal conduct well after the offenses have been committed. A sentence of incarceration and a strong message of general deterrence in this case is necessary to ensure that U.S. taxpayers do not use foreign financial accounts to evade their taxes.

The government concedes that the defendant will pay a great financial price for his crimes. He has already remitted over \$14 million to the government as a civil penalty for his willful failure to report his foreign banks accounts. Nevertheless, the defendant should receive no mercy for paying over what amounts to slightly more than 7% of his current net worth. He had numerous opportunities to report his accounts, had access to seasoned professionals who knew how to do such reporting, and chose not to do so. He has no one to blame but himself. Further, Kim would have owed the same civil penalty had he been audited, not prosecuted.





## CERTIFICATE OF SERVICE

I hereby certify that on the 19<sup>th</sup> day of January, 2018, I electronically filed the foregoing Position of the United States With Respect to Sentencing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

A copy has also been sent via email to:

Karen Riffle  
Supervising United States Probation Officer  
[Karen\\_Riffle@vaep.uscourts.gov](mailto:Karen_Riffle@vaep.uscourts.gov)

/s/  
 \_\_\_\_\_  
 Mark F. Daly  
 Special Assistant United States Attorney

# EXHIBIT G



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

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Crim. Action No. 17-0201-01 (ABJ)
	)	
PAUL J. MANAFORT, JR.,	)	
	)	
Defendant.	)	
	)	

## ORDER

Defendant Paul J. Manafort, Jr. entered a plea of guilty in this case on September 14, 2018. The plea agreement [Dkt. # 422] provides:

Your client shall cooperate fully, truthfully, completely, and forthrightly with the Government . . . .

Plea Agreement ¶ 8.

Defendant agreed in paragraph 8(a) of the agreement to be debriefed; in paragraph 8(c) to testify at any proceedings, and in paragraph 8(f) that he “must at all times give complete, truthful, and accurate information and testimony, and must not commit, or attempt to commit, any further crimes.” Paragraph 8 goes on to provide that defendant “shall testify fully, completely and truthfully before any and all Grand Juries” in the District of Columbia or elsewhere.

Paragraph 13 – “Breach of Agreement” provides:

Your client understands and agrees that, if after entering this Agreement, [he] fails specifically to perform or to fulfill completely each and every one of [his] obligations under this Agreement, or engages in any criminal activity prior to sentencing or during his cooperation . . . , [he] will have breached this Agreement.

Should it be judged by the Government in its sole discretion that the defendant has failed to cooperate fully, has intentionally given false, misleading or incomplete information or testimony, has committed or attempted to commit any further crimes, or has otherwise violated any provision of this agreement, the defendant will not be released from his pleas of guilty but the Government will be released from its obligations under the agreement, including (a) not to oppose

the downward adjustment [to the U.S. Sentencing Guidelines calculation] for acceptance of responsibility . . . .

Your client understands that the Government shall be required to prove a breach of this Agreement only by good faith.

The defendant accepted the plea agreement; the signed acceptance on last page states, “I fully understand this Agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound.” After the plea was entered, sentencing was deferred while the defendant’s cooperation was ongoing.

On November 26, 2018, the parties informed the Court in a joint status report [Dkt. # 455] that it was the government’s position that the defendant had breached the plea agreement by making false statements to the FBI and Office of Special Counsel (“OSC”) and that it was time to set a sentencing date. The defendant disputed the government’s characterization of the information he had provided and denied that he had breached the agreement, but he agreed that in light of the dispute, it was time to proceed to sentencing. Thereafter, the government was ordered to provide the Court with information concerning the alleged breach, a schedule was established for the defense to respond, and the following submissions were made a part of the record in the case:

December 7, 2018	Government’s Submission in Support of its Breach Determination [Dkt. # 461] (Sealed); [Dkt. # 460] (Public)
January 8, 2019	Defendant’s Response to the Government’s Submission in Support of its Breach Determination [Dkt. # 470] (Sealed); [Dkt. # 472] (Public)
January 15, 2019	FBI Declaration in Support of the Government’s Breach Determination with accompanying exhibits [Dkt # 477] (Sealed); [Dkt. # 476] (Public)
January 23, 2019	Defendant’s Reply to the Declaration [Dkt. # 481] (Sealed); [Dkt. # 482] (Public)

The Court held a sealed hearing on February 4, 2019, and the parties each filed post-hearing submissions. *See* Def.’s Post-Hearing Mem. [Dkt. # 502] (Sealed), [Dkt. # 505] (Public); Government’s Suppl. [Dkt. # 507] (Sealed).

It is a matter of public record that the Office of Special Counsel has alleged that the defendant made intentionally false statements to the FBI, the OSC, and/or the grand jury in connection with five matters: a payment made by Firm A to a law firm to pay a debt owed to the law firm by defendant Manafort; co-defendant Konstantin Kilimnik’s role in the obstruction of justice conspiracy; the defendant’s interactions and communications with Kilimnik; another Department of Justice investigation; and the defendant’s contacts with the current administration after the election. The parties are agreed that it is the government’s burden to show that there has been a breach of the plea agreement, but to be relieved of its obligations under the agreement, it must simply demonstrate that its determination was made in good faith. Plea Agreement ¶ 13.

In its January 8, 2019 response to the breach allegations, the defense stated that “given the highly deferential standard that applies to the Government’s determination,” Def.’s Resp. [Dkt. # 472] at 2, it was not challenging the assertion that the determination was made in good faith. And, in response to a question posed by the Court at a status hearing held on January 25, 2019, the defendant conceded that the determination was made in good faith. Tr. of Hearing (Jan. 25, 2019) [Dkt. # 500] at 13.

In light of the defendant’s concession, and based upon the Court’s independent review of entire record, including: all of the pleadings listed above and the supporting exhibits; the facts and arguments placed on the record at the hearing held on February 4, 2019; and the post-hearing submissions, the Court ruled at the hearing held on February 13, 2019 that the Office of Special Counsel made its determination that the defendant made false statements and thereby breached the plea agreement in good faith. Therefore, the Office of Special Counsel is no longer bound by its obligations under the plea agreement, including its promise to support a reduction of the offense level in the calculation of the U.S. Sentencing Guidelines for acceptance of responsibility.

But that is not the only question before the Court to decide. The question remains whether the defendant made intentionally false statements in connection with the five matters that have been identified by the Office of Special Counsel. The answer bears upon the applicability of certain provisions of the Sentencing Guidelines, in particular, the adjustment for acceptance of responsibility, and it bears more generally on the Court’s assessment of the factors set forth in the sentencing statute, 18 U.S.C. § 3553(a). The parties are agreed that the government is bound to prove facts that bear on the application of the Guidelines by a preponderance of the evidence.

Based upon its consideration of the entire record and the arguments of counsel at the hearing of February 4, 2019, for the reasons stated on the record at the continuation of the sealed hearing on February 13, 2019, the Court made the following additional findings:

- I. OSC has established by a preponderance of the evidence that defendant intentionally made false statements to the FBI, the OSC, and the grand jury concerning the payment by Firm A to the law firm, a matter that was material to the investigation. *See United States v. Moore*, 612 F.3d 698, 701 (D.C. Cir. 2010).
- II. OSC has failed to establish by a preponderance of the evidence that on October 16, 2018, defendant intentionally made false statements concerning Kilimnik’s role in the obstruction of justice conspiracy.
- III. OSC has established by a preponderance of the evidence that the defendant intentionally made multiple false statements to the FBI, the OSC, and the grand jury concerning matters that were material to the investigation: his interactions and communications with Kilimnik.
- IV. OSC has established by a preponderance of the evidence that on October 5, 2018, the defendant intentionally made false statements that were material to another DOJ investigation.

V. OSC has failed to establish by a preponderance of the evidence that on October 16, 2018, defendant intentionally made a false statement concerning his contacts with the administration.

This order does not address the question of whether the defendant will receive credit for his acceptance of responsibility in connection with the calculation of the Sentencing Guidelines or how any other Guideline provision will apply to this case. Those issues, which depend on the consideration of a number of additional factors, will be determined at sentencing, after the Presentence Investigation Report has been completed, the parties have filed their memoranda in aid of sentencing, and the Court has heard argument.

The Court reporter is hereby ORDERED to provide a copy of the sealed transcript of today's hearing to the parties by 12:00 noon on February 14, 2019, and the parties must inform the Court of any redactions that must to be made before the transcript can be released no later than 11:00 a.m. on February 15, 2019.

SO ORDERED.

Amy B. Jack

AMY BERMAN JACKSON  
United States District Judge

DATE: February 13, 2019

# **ATTACHMENT F**

**REDACTED**



## Attachment G - Index of Exhibits

**Proposed Trial Exhibits**

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>
434	Chart, Foreign Transfers to United States Accounts of Entities Performing Work in the United States
436	Chart, FARA Related 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
441	Chart, Government Relations Activity & Government Relations Activity: Paul Manafort
442	Chart, Public Relations Activity
443	Chart, Outreach to [REDACTED]
444	Chart, Skadden Report
448	Chart, Legislation
449	Chart, Legislation: Durbin Resolution
504	Memo, June 27, 2012, "CREATION OF A SUPER VIP GROUP..."
505	Memo, July 3, 2012, P. Manafort to [REDACTED], et. al., "Program to Conduct Briefings of Embassies, Media and NGOs"
569	Memo, Apr. 8, 2012, PJM to VFY, "AC Project Update"
695	Memo, Mar. 23, 2013, P. Manafort to [REDACTED], "US Consultants Activity – Weekly Update"
833	Email, Sept. 28, 2012, [REDACTED] to [REDACTED], Re Fw: eyes only
852	Email, May 17, 2013, [REDACTED] to [REDACTED], Re DC notes
910	Excerpt of DOJ Section 5 Inspection File, Registration No. 3600 Black, Manafort, Stone and Kelly Public Affairs Company
926	FARA Registration Statement, DMP International, LLC (Registration No. 6440), June 27, 2017
941	FARA Registration Statement, P. Manafort (Registration No. 3594), June 1, 1984
945	FARA Supplemental Statement, P. Manafort (Registration No. 3594), July 3, 1985
949	FARA Registration Amendment, P. Manafort (Registration No. 3594), June 26, 1986
1028	Exhibits A and B to FARA Registration Statement; [REDACTED], [REDACTED]
1237	Email, Nov. 14, 2012, R. Gates to [REDACTED], Re Contract
1307	Memo, Aug. 1, 2012, P. Manafort to [REDACTED], "SA Report – Media Plan"
1308	Email, Sept. 19, 2012, [REDACTED] to R. Gates, P. Manafort, [REDACTED], Re an urgent request ON IT
1349	Letter, May 4, 2012, [REDACTED], "ECFMU"
1351	Email, May 18, 2012, [REDACTED] to [REDACTED], Re Ukraine – What we've been up to
1357	Email, June 22, 2012, [REDACTED] to [REDACTED], Re FW: RAPSI.com: U.S. attorneys in ECHR under Tymoshenko case cost Ukraine \$12,5k
1486	Calendar Record, Mar. 19, 2013, "Dinner/Manafort, [REDACTED] / reservation under [REDACTED]," Capitol Hill Club
1608	Email, May 4, 2012, [REDACTED] to [REDACTED], Re Send to Rick?
1763	Email, Nov. 29, 2012, [REDACTED] to [REDACTED], Re Assessment
1937	Email, Nov. 19, 2013, [REDACTED] to [REDACTED], Re Durbin Resolution
2012	Memo, Apr. 5, 2012, [REDACTED] to [REDACTED], "Projects and Plans"
2013	Email, Apr. 11, 2012, [REDACTED] to A. van der Zwaan, Re FW Tomorrow – Friday 4/6
2069	Email, Aug. 9, 2012, [REDACTED] to [REDACTED], Re Kyiv Post Editorial: Skadden Stink

<b>Exhibit No.</b>	<b>Description</b>
2078	Email, Aug. 30, 2012, A. van der Zwaan to [REDACTED], et. al., Re Project 2
2079	Email, Aug. 30, 2012, [REDACTED] to [REDACTED], Re Project 2
2106	Email, Nov. 28, 2012, [REDACTED] to P. Manafort, Re [REDACTED]'s Memo

**Miscellaneous Exhibits**

<b>Date</b>	<b>Description</b>
May 27, 1987	Excerpt of DOJ Section 5 Inspection file, Registration No. 3594 Paul J. Manafort
Feb. 1, 2018	R. Gates 302
Aug. 10, 2018	[REDACTED] 302

# **EXHIBIT 434**

# Foreign Transfers to United States Accounts of Entities Performing Work in the United States

Payee	Date	Payer	Originating Bank Account	Country of Origin	Country of Destination	Amount
[REDACTED]	8/2/2012	Bletilla Ventures Limited	Bank of Cyprus Account -0480	Cyprus	US	\$ 270,000.00
	10/10/2012	Bletilla Ventures Limited	Bank of Cyprus Account -0480	Cyprus	US	\$ 90,000.00
	11/16/2012	Bletilla Ventures Limited	Bank of Cyprus Account -0480	Cyprus	US	\$ 120,000.00
	11/20/2012	Bletilla Ventures Limited	Bank of Cyprus Account -0480	Cyprus	US	\$ 182,968.07
	12/21/2012	Bletilla Ventures Limited	Bank of Cyprus Account -0480	Cyprus	US	\$ 25,000.00
	3/15/2013	Bletilla Ventures Limited	Hellenic Bank Account -2501	Cyprus	US	\$ 90,000.00
	9/18/2013	Global Endeavour Inc.	Loyal Bank Limited Account -1840	SVG*	US	\$ 135,937.37
	10/31/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$ 167,689.40
	3/28/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$ 135,639.65
	4/3/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$ 82,979.93
<b>Total</b>		<b>Transfers</b>				<b>\$ 1,300,214.42</b>
[REDACTED]	5/30/2012	Bletilla Ventures Limited	Bank of Cyprus Account -0480	Cyprus	US	\$ 130,000.00
	8/2/2012	Bletilla Ventures Limited	Bank of Cyprus Account -0480	Cyprus	US	\$ 195,000.00
	10/10/2012	Bletilla Ventures Limited	Bank of Cyprus Account -0480	Cyprus	US	\$ 130,000.00
	11/16/2012	Bletilla Ventures Limited	Bank of Cyprus Account -0480	Cyprus	US	\$ 50,000.00
	12/21/2012	Bletilla Ventures Limited	Bank of Cyprus Account -0480	Cyprus	US	\$ 54,649.51
	3/15/2013	Bletilla Ventures Limited	Hellenic Bank Account -2501	Cyprus	US	\$ 150,000.00
	9/3/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$ 175,857.51
	10/31/2013	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$ 195,857.51
	3/12/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$ 26,891.78
	3/21/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$ 138,026.00
	4/15/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$ 4,728.81
	4/25/2014	Jeunet Ltd.	Loyal Bank Limited Account -4978	SVG*	US	\$ 4,739.23
<b>Total</b>		<b>Transfers</b>				<b>\$ 1,255,750.35</b>
[REDACTED]	4/19/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$ 2,000,000.00
	5/30/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$ 1,000,000.00
	7/13/2012	Black Sea View Limited	Bank of Cyprus Account -7412	Cyprus	US	\$ 1,000,000.00
<b>Total</b>		<b>Transfers</b>				<b>\$ 4,000,000.00</b>
<b>Total Transfers</b>						<b>\$ 6,555,964.77</b>

\*SVG - Saint Vincent and the Grenadines

Refer to exhibits 93, 94, 106, 1561, 1968, and 2126 for supporting documentation



# **EXHIBIT 436**

## Summary of Payments to Skadden, Arps, Slate, Meagher & Flom LLP

Date	Payer	Country of Origin		Amount
4/19/2012	Black Sea View Limited	Cyprus	\$	2,000,000.00
5/30/2012	Black Sea View Limited	Cyprus	\$	1,000,000.00
7/13/2012	Black Sea View Limited	Cyprus	\$	1,000,000.00
<b>Total Payments to Skadden, Arps, Slate, Meagher &amp; Flom LLP:</b>				<b>\$ 4,000,000.00</b>





## Summary of Payments to [REDACTED]

<b>Date</b>	<b>Payer</b>	<b>Country of Origin</b>	<b>Amount</b>	
5/30/2012	Black Sea View Limited	Cyprus	\$	141,120.00
6/22/2012	Black Sea View Limited	Cyprus	\$	140,895.00
7/13/2012	Black Sea View Limited	Cyprus	\$	139,275.00
8/16/2012	Black Sea View Limited	Cyprus	\$	141,210.00
9/17/2012	Black Sea View Limited	Cyprus	\$	145,919.00 **
10/17/2012	Black Sea View Limited	Cyprus	\$	177,007.00 **
11/20/2012	Black Sea View Limited	Cyprus	\$	143,137.00 **
<b>Total Payments to [REDACTED]</b>			<b>: \$</b>	<b>1,028,563.00</b>

\*\*For purposes of this analysis, Euro transactions were converted to US Dollars on the date of the transaction per the foreign bank records using historical daily exchange rates per <https://www.oanda.com/currency/converter>.

## Summary of Payments to [REDACTED]

<b>Date</b>	<b>Payer</b>	<b>Country of Origin</b>		<b>Amount</b>
8/2/2012	Bletilla Ventures Limited	Cyprus	\$	270,000.00
10/10/2012	Bletilla Ventures Limited	Cyprus	\$	90,000.00
11/16/2012	Bletilla Ventures Limited	Cyprus	\$	120,000.00
11/20/2012	Bletilla Ventures Limited	Cyprus	\$	182,968.07
12/21/2012	Bletilla Ventures Limited	Cyprus	\$	25,000.00
3/15/2013	Bletilla Ventures Limited	Cyprus	\$	90,000.00
9/18/2013	Global Endeavour Inc.	SVG*	\$	135,937.37
10/31/2013	Jeunet Ltd.	SVG*	\$	167,689.40
3/28/2014	Jeunet Ltd.	SVG*	\$	135,639.65
4/3/2014	Jeunet Ltd.	SVG*	\$	82,979.93
<b>Total Payments to [REDACTED]</b>			<b>: \$</b>	<b>1,300,214.42</b>

\*SVG - Saint Vincent and the Grenadines

## Summary of Payments to [REDACTED]

Date	Payer	Country of Origin		Amount
5/30/2012	Bletilla Ventures Limited	Cyprus	\$	130,000.00
8/2/2012	Bletilla Ventures Limited	Cyprus	\$	195,000.00
10/10/2012	Bletilla Ventures Limited	Cyprus	\$	130,000.00
11/16/2012	Bletilla Ventures Limited	Cyprus	\$	50,000.00
12/21/2012	Bletilla Ventures Limited	Cyprus	\$	54,649.51
3/15/2013	Bletilla Ventures Limited	Cyprus	\$	150,000.00
9/3/2013	Jeunet Ltd.	SVG*	\$	175,857.51
10/31/2013	Jeunet Ltd.	SVG*	\$	195,857.51
3/12/2014	Jeunet Ltd.	SVG*	\$	26,891.78
3/21/2014	Jeunet Ltd.	SVG*	\$	138,026.00 **
4/15/2014	Jeunet Ltd.	SVG*	\$	4,728.81
4/25/2014	Jeunet Ltd.	SVG*	\$	4,739.23
<b>Total Payments to [REDACTED]</b>			<b>\$</b>	<b>1,255,750.35</b>

\*SVG - Saint Vincent and the Grenadines

\*\*For purposes of this analysis, Euro transactions were converted to US Dollars on the date of the transaction per the foreign bank records using historical daily exchange rates per <https://www.oanda.com/currency/converter>.

## Summary of Payments to [REDACTED] ^

Date	Payer	Country of Origin	Amount	
12/5/2012	Black Sea View Limited	Cyprus	\$ 54,760.50	**
3/6/2013	Marziola Holdings Limited	Cyprus	\$ 603,520.00	
8/27/2013	Jeunet Ltd.	SVG*	\$ 307,643.00	**
<b>Total Payments to [REDACTED]:</b>			<b>\$ 965,923.50</b>	

\*SVG - Saint Vincent and the Grenadines

\*\*For purposes of this analysis, Euro transactions were converted to US Dollars on the date of the transaction per the foreign bank records using historical daily exchange rates per <https://www.oanda.com/currency/converter>.

^In 2011, [REDACTED] (FBC), using a British Virgin Islands company called [REDACTED] entered into a 1.3 million Euro contract with [REDACTED], a company incorporated in the Seychelles, for work performed in the United States and Europe. (See Exhibit 1048 for the contract). According to the contract, [REDACTED] requested payments from [REDACTED] be made to [REDACTED]'s Swiss bank account. Financial records identifying the specific payments were not available.

In 2012, [REDACTED] used a company called [REDACTED] to receive approximately \$54,760 for work performed. In 2013, [REDACTED] used a company called [REDACTED] to receive approximately \$911,163 for work performed.

**Summary of Payments to** [REDACTED]

<b>Date</b>	<b>Payer</b>	<b>Country of Origin</b>	<b>Amount</b>	
9/10/2012	Bletilla Ventures Limited	Cyprus	\$	1,191,610.00 **
11/30/2012	Black Sea View Limited	Cyprus	\$	34,641.90 **
3/6/2013	Marziola Holdings Limited	Cyprus	\$	616,640.00
8/27/2013	Jeunet Ltd.	SVG*	\$	936,306.00 **
8/27/2013	Jeunet Ltd.	SVG*	\$	45,170.70 **
4/14/2014	Jeunet Ltd.	SVG*	\$	24,981.00 **
<b>Total Payments to</b> [REDACTED]			<b>\$</b>	<b>2,849,349.60</b>

\*SVG - Saint Vincent and the Grenadines

\*\*For purposes of this analysis, Euro transactions were converted to US Dollars on the date of the transaction per the foreign bank records using historical daily exchange rates per <https://www.oanda.com/currency/converter>.

# **EXHIBIT 437**

## Payments from Foreign Entities to Entities Performing Work in the United States

Entity	Time Period	Total Payments
Skadden, Arps, Slate, Meagher & Flom LLP	April 2012 - July 2012	\$ 4,000,000.00
[REDACTED] *	September 2012 - April 2014	\$ 2,849,349.60
[REDACTED]	August 2012 - April 2014	\$ 1,300,214.42
[REDACTED] *	May 2012 - April 2014	\$ 1,255,750.35
[REDACTED] *	May 2012 - November 2012	\$ 1,028,563.00
[REDACTED] *^	December 2012 - August 2013	\$ 965,923.50
<b>Total Payments</b>		<b>\$ 11,399,800.87</b>

\*For purposes of this analysis, Euro transactions were converted to US Dollars on the date of the transaction per the foreign bank records using historical daily exchange rates per <https://www.oanda.com/currency/converter>.

^In 2011, [REDACTED], using a British Virgin Islands company called [REDACTED], entered into a 1.3 million Euro contract with [REDACTED], a company incorporated in the Seychelles, for work performed in the United States and Europe. (See Exhibit 1048 for the contract). According to the contract, [REDACTED] requested payments from [REDACTED] be made to [REDACTED] Swiss bank account. Financial records identifying the specific payments were not available.

In 2012, [REDACTED] used a company called [REDACTED] to receive approximately \$54,760 for work performed. In 2013, [REDACTED] used a company called [REDACTED] to receive approximately \$911,163 for work performed.



# **EXHIBIT 438**

**False and Misleading Foreign Agents Registration Act Statements in Counts 4 and 5  
Documents in Manafort's Possession Beyond DMI's Thirty-Day Retention Policy**

<b>Date</b>	<b>Evidence</b>	<b>Participants</b>	<b>Exhibit</b>	<b>Source</b>	<b>Metadata</b>
6/25/2012	Manafort memo to Gates, Kilimnik and [REDACTED] regarding "Going on Offense - Ukraine Action Plan for Europe and US."	Manafort, Gates, Kilimnik and [REDACTED]	503	Manafort 4182 Subpoena Return (also have under diff BIDMAS # with Metadata)	Author and Last Save: Manafort
7/3/2012	Manafort memo to [REDACTED] and others regarding "Program to Conduct Briefings of Embassies, Media and NGOS."	Manafort, [REDACTED], and other Ukrainians	505	Manafort 4182 Subpoena Return	NA
10/9/2012	Memo regarding "Observer Group Strategy Team."		517	Manafort 4182 Subpoena Return	NA
2/20/2010	Manafort memo to Yanukovych regarding "Launch of Public Affairs Plan."	Manafort, Yanukovych	532	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Manafort

**False and Misleading Foreign Agents Registration Act Statements in Counts 4 and 5**  
**Documents in Manafort's Possession Beyond DMI's Thirty-Day Retention Policy**

<b>Date</b>	<b>Evidence</b>	<b>Participants</b>	<b>Exhibit</b>	<b>Source</b>	<b>Metadata</b>
6/18/2010	Manafort memo to Yanukovych regarding Update on Key Policy Initiatives.	Manafort, Yanukovych	539	Manafort 4182 Subpoena Return	Author and Last Save: Manafort
3/2/2011	Manafort memo to ██████ regarding "█████ call today - News from Washington."	Manafort, Lyovochkin	543	Manafort 4182 Subpoena Return	NA
10/11/2011	Manafort memo to ██████ regarding consulting payments.	Manafort, ██████	550	Manafort 1B76 (G drive slim) Manafort Condo Search	Last Saved: Manafort
9/24/2012	Manafort memo to Yanukovych regarding "Our Current Washington Strategy and Post Elections Plan."	Manafort, Yanukovych	594	Manafort 1B85 (thumb drive) Manafort Condo Search	Last Saved: Manafort

**False and Misleading Foreign Agents Registration Act Statements in Counts 4 and 5**  
**Documents in Manafort's Possession Beyond DMI's Thirty-Day Retention Policy**

<b>Date</b>	<b>Evidence</b>	<b>Participants</b>	<b>Exhibit</b>	<b>Source</b>	<b>Metadata</b>
1/15/2013	Manafort created memo titled "VY Agenda" with references to "US Update" - [REDACTED] and [REDACTED] back channel.	Manafort	602	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Manafort
2/4/2013	Manafort memo to [REDACTED] regarding "US Government Activity."	Manafort, Yanukovych, Gates	604	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Gates
2/21/2013	Manafort memo to [REDACTED] regarding "Hapsburg – Update" in the U.S.	Manafort, Yanukovych	606	Manafort 1B85 (thumb drive) Manafort Condo Search	Last Saved: Manafort
3/21/2013	Manafort created memo titled "Gates Agenda."	Manafort	613	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Manafort

**False and Misleading Foreign Agents Registration Act Statements in Counts 4 and 5**  
**Documents in Manafort's Possession Beyond DMI's Thirty-Day Retention Policy**

<b>Date</b>	<b>Evidence</b>	<b>Participants</b>	<b>Exhibit</b>	<b>Source</b>	<b>Metadata</b>
4/22/2013	Manafort memo to Yanukovych regarding "US Consultants – Quarterly Report."	Manafort, Yanukovych, Gates	616	Manafort 1B85 (thumb drive) Manafort Condo Search	Last Saved: Manafort
4/25/2013	Manafort memo to ██████████ regarding summary of accounts overdue to include Hapsburg , U.S. lobbying and PR.	Manafort, Yanukovych	617	Manafort 1B96 (iomega portable hard drive) - Manafort Condo Search	Author: Manafort
2/1/2013	Manafort created memo titled "RG TO DO."	Manafort	690	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Manafort
2/24/2013	Manafort memo to ██████████ regarding Hapsburg activity updates in the U.S.	Manafort, ██████████	691	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Manafort

**False and Misleading Foreign Agents Registration Act Statements in Counts 4 and 5**  
**Documents in Manafort's Possession Beyond DMI's Thirty-Day Retention Policy**

<b>Date</b>	<b>Evidence</b>	<b>Participants</b>	<b>Exhibit</b>	<b>Source</b>	<b>Metadata</b>
2/26/2013	Manafort memo to ██████ regarding ██████ US visit" and stated "We need to increase the frequency of key members from the GoU coming to the US."	Manafort, ██████, Gates	692	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Manafort
3/16/2013	Manafort memo to ██████ regarding "████ Trip to Washington- based on an agenda we arranged to continue our strategy of repositioning key political and policy issues between the GoU and the USG."	Manafort, ██████, Gates	694	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Manafort
3/23/2013	Manafort memo to ██████ "US Consultants Activity – Weekly Update."	Manafort, ██████, Gates	695		Last Saved: Manafort

**False and Misleading Foreign Agents Registration Act Statements in Counts 4 and 5**  
**Documents in Manafort's Possession Beyond DMI's Thirty-Day Retention Policy**

<b>Date</b>	<b>Evidence</b>	<b>Participants</b>	<b>Exhibit</b>	<b>Source</b>	<b>Metadata</b>
4/7/2013	Manafort memo to [REDACTED] regarding "Hapsburg – April/May Plan."	Manafort, [REDACTED]	696	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Manafort
4/21/2013	Manafort memo to [REDACTED] regarding "US consultant activity for the week" to include GR and PR.	Manafort, [REDACTED], Gates	697	Manafort 1B85 (thumb drive) Manafort Condo Search	Last Saved: Manafort
5/8/2013	Memo titled Meeting Summaries - [REDACTED].	[REDACTED]	703	Manafort IB78 (Western Digital external hard drive) - Manafort Condo Search	NA



**False and Misleading Foreign Agents Registration Act Statements in Counts 4 and 5**  
**Documents in Manafort's Possession Beyond DMI's Thirty-Day Retention Policy**

<b>Date</b>	<b>Evidence</b>	<b>Participants</b>	<b>Exhibit</b>	<b>Source</b>	<b>Metadata</b>
5/13/2013	Manafort memo to [REDACTED] titled Washington, DC Visits.	Manafort, [REDACTED] and others	705	Manafort IB78 (Western Digital external hard drive) - Manafort Condo Search	Author and Last Save: Gates
6/9/2013	Manafort memo to [REDACTED] titled "[REDACTED] Trip Report."	Manafort, [REDACTED]	706	Manafort 1B85 (thumb drive) Manafort Condo Search	Last Saved: Manafort
6/17/2013	Manafort memo to [REDACTED] titled "Ledger Update."	Manafort, [REDACTED]	707	Manafort IB78 (Western Digital external hard drive) - Manafort Condo Search	Last Saved: Manafort

**False and Misleading Foreign Agents Registration Act Statements in Counts 4 and 5**  
**Documents in Manafort's Possession Beyond DMI's Thirty-Day Retention Policy**

<b>Date</b>	<b>Evidence</b>	<b>Participants</b>	<b>Exhibit</b>	<b>Source</b>	<b>Metadata</b>
7/10/2013	Manafort memo to [REDACTED] titled "Hapsburg and US."	Manafort, [REDACTED]	708	Manafort IB78 (Western Digital external hard drive) - Manafort Condo Search	Last Saved: Manafort
7/22/2014	Manafort memo to [REDACTED] titled "Wire Payments."	Manafort, [REDACTED]	710	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Manafort
4/25/2013	Manafort created memo titled "Kyiv Agenda, Week of April 23."	Manafort	712	Manafort 1B85 (thumb drive) Manafort Condo Search	Author and Last Save: Manafort
No Date	Memo titled PJM Presentation to Weekly Campaign Management Meeting.	Manafort	713	Manafort Storage Locker Search	NA

**False and Misleading Foreign Agents Registration Act Statements in Counts 4 and 5  
Documents in Manafort's Possession Beyond DMI's Thirty-Day Retention Policy**

<b>Date</b>	<b>Evidence</b>	<b>Participants</b>	<b>Exhibit</b>	<b>Source</b>	<b>Metadata</b>
3/5/2013	Calendar invite from [REDACTED] to Manafort for dinner with Congressman [REDACTED] on 3/19/13.	Manafort, [REDACTED], Gates	1486	Manafort [REDACTED] [REDACTED] Search	NA

# **EXHIBIT 441**

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
6/2/2005	C	DMP	From: PJM To: [REDACTED] CC: [REDACTED]	From	Memo summarizing Manafort's meeting with the coordinator of US-Ukraine policy at the National Security Council	National Security Council	500
6/18/2005	P	-	-	Author/Last Saved	Memo titled <i>Basel Presentation</i> , detailing a programmatic strategy based upon a direct mandate provided by [REDACTED]. The three programs identified are political efforts, government lobbying, and legal efforts.	US and European Governments (USG Entities: State Department; White House; National Security Council; Commerce Department; AID; World Bank)	520
6/23/2005	P	[REDACTED]; DMP	From: Paul J. Manafort, [REDACTED] To: [REDACTED] Author/Last Saved: [REDACTED]	From	Memo, with the subject line "Political, Lobbying and Legal Program for CIS", provides an update on the project's success within Ukraine and outlines a strategy for CIS countries	White House; Capitol Hill; US State Department	521
6/25/2005	P	-	-	Author/Last Saved	Memo to [REDACTED]	White House; National Security Council; Office of the VP; State Department; Energy Department; Commerce Department; Interior Department; Congress (bi-partisan outreach to leaders in the House and Senate; outreach to relevant committees)	522

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
8/10/2005	P	-	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Author:</b> [REDACTED]	Last Saved	Memo	National Security Council; State Department; Treasury Department; Commerce Department; SSCI; HPSCI	523
2/16/2010	P; C	DMP	<b>From:</b> PJM <b>To:</b> VFY	Author/Last Saved	Email identifying recipients who received a financial bonus from Manafort, for VFY's consideration for an additional bonus from VFY. One recipient listed is "Main US Lobbyist".	Main US Lobbyist	531
2/20/2010	P; C	DMP	<b>From:</b> Paul J. Manafort <b>To:</b> President Victor Yanukovich	Author	Memo defines a plan to manage the strategy, public relations and international affairs for President Yanukovich. Manafort references previously managing a Government Relations program for VFY, that Manafort personally created and paid for.	Diplomatic and Political Communities within the US	532
4/9/2010	P	DMP	<b>From:</b> PJM <b>To:</b> VFY	From	Memo to VFY regarding VFY's upcoming trip to the US, which includes talking points for a meeting with [REDACTED]	US Presidential Administration; US Treasury; World Bank	536

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
6/18/2010	P; C	DMP	<b>From:</b> Paul J. Manafort <b>To:</b> President Victor Yanukovich	From; Author/Last Saved	Memo to VFY offering thanks for a financial bonus VFY sent, providing updates on Manafort's meetings with USG entities re: IMF deal, and talking points for a future meeting between VFY and [REDACTED]	US Department of Treasury, National Security Council	539
3/2/2011	P	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From	Email providing talking points for a scheduled call between VFY and [REDACTED]	White House Administration	543



## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
9/9/2011	P	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> Paul Manafort <b>Cc:</b> Konstantin Kilimnik, [REDACTED]	To	Arranging a meeting for a Ukrainian delegation with senior-level Hill staffers and foreign policy scholars and editors	[REDACTED] Senior Congressional staffers [REDACTED] former [REDACTED]	1072
10/16/2011	C	-	<b>From:</b> K. Kilimnik <b>To:</b> [REDACTED], two (2) other recipients	Author/Last Saved	Memo from to VFY with a readout of meetings and phone calls Manafort has had regarding Tymoshenko.	"Washington" - entities are not further specified	551

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
3/6/2012	P	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Arranging meetings with the National Security Council for Prime Minister (PM) [REDACTED]'s upcoming visit and identifying other persons of interest for the PM to meet.	[REDACTED] (White House); [REDACTED] (White House); <i>Potential meetings:</i> [REDACTED]	1935
3/13/2012	C	DMP	<b>From:</b> Konstanin Kilimnik <b>To:</b> Paul Manafort <b>Last Saved:</b> Konstantin Kilimnik	Author	Memo to VFY about contact with the European and US government regarding Tymosheno	National Security Council	563

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
4/5/2012	P	Podesta	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	A strategic outline identifying members of Congress for efforts of neutralization or positive engagement regarding policy toward Ukraine	House/Senate Foreign Affairs Committee; [REDACTED]	1581
4/10/2012	P	DMP	<b>From:</b> Konstantin Kilimnik <b>To:</b> Paul Manafort	To	Kilimnik has a called scheduled with [REDACTED] and [REDACTED] has requested weekly updates regarding lobbying, PR, and GR activities.	-	567
4/11/2012	P	DMP	<b>From:</b> Paul Manafort <b>To:</b> K. Kilimnik; Rick Gates	From	Email chain discussing providing an update to [REDACTED] re: [REDACTED] and [REDACTED]. PM provides guidance to include [REDACTED] activities.	-	568

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
4/11/2012	P	[REDACTED] DMP	<b>(Email) From:</b> Konstantin Kilimnik <b>(Email)</b> <b>To:</b> Two (2) other Russian recipients <b>(Memo) From:</b> PJM <b>(Memo) To:</b> VFY <b>Author/Last saved:</b> Rick Gates	From	Update on the public affairs and government relations strategy. There is a proposal for a US Congressional delegation to Ukraine.	US Congressional members	569
4/20/2012	P	[REDACTED] DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates is requesting a strategic plan, to include tactical items, in preparation for a meeting scheduled with "the top guy[.]"	-	1591
4/20/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Memo titled <i>GR Targets</i>	Congress; Administration	1592
5/9/2012	P	[REDACTED] DMP	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] Rick Gates; [REDACTED]	-	Removing ECFMU Facebook content referencing Tymoshenko in order to further engagement with Senate staffers	[REDACTED]	1612

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
5/9/2012	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> Jodi Herman (Senator Menendez's office)	-	Contacted Senator's office and advised ECFMU is a new client.	[REDACTED]	1613
5/10/2012	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Conducted outreach to members of the Senate for prospective meetings with [REDACTED], an LDA client.	[REDACTED]	1616
5/10/2012	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Draft talking points for [REDACTED] in preparation for a meeting with the National Security Council	[REDACTED]	1617
5/10/2012	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Scheduling meetings for [REDACTED], who is "essentially making [a] case for the government",	[REDACTED]	1618
5/10/2012	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Meetings scheduled and coordinated are approved by Rick Gates	[REDACTED]	1619
5/10/2012	P	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Proposed meeting with National Security Council	[REDACTED]	1620
5/10/2012	P	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Outreach to the White House to confirm a formal invitation for Yakunovich to NATO event.	White House; NATO	1621

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
5/11/2012	A	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Coordinating a meeting with [REDACTED] and [REDACTED]	[REDACTED]	1622
5/11/2012	A	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Gates approved meetings are scheduled with two Senators.	[REDACTED]	1623
5/14/2012	A; C	[REDACTED]	-	-	Confirmed schedule and itinerary for [REDACTED]	[REDACTED]	1415
5/15/2012	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED]	-	Scheduled a meeting between [REDACTED] and [REDACTED], noting that [REDACTED] will lead a Congressional delegation to Ukraine	[REDACTED]	1416
5/16/2012	P	[REDACTED]	<b>From:</b> A [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	[REDACTED] requesting a meeting with [REDACTED]. [REDACTED] outreach to NSC to coordinate.	[REDACTED]	1625

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
5/18/2012	P	[REDACTED] DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Scheduling meetings for the Minister of Foreign Affairs	[REDACTED]	1628
5/18/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Scheduling meetings for the [REDACTED] Foreign Minister and state "..but we don't represent the government."	[REDACTED]	1629
5/23/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Distributing materials directly to Rep. Burton's top staffer, to pass along to the Congressional delegation to Ukraine, as opposed to the delegation members directly	[REDACTED]	1633
5/25/2012	C	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates <b>Cc:</b> [REDACTED]	-	Memo regarding Inhofe Resolution and comments regarding congressional office outreach coordination between [REDACTED]	[REDACTED]	1636



## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
5/30/2012	P	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED]	-	Outreach to Congress regarding the Inhofe amendment, following a meeting with Gates discussing Ukraine.	Republican Senators; Republican Representatives; State Department	1638
5/30/2012	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED]	-	Email to Foreign Affairs committee staffer, as a representative of [REDACTED], regarding the Inhofe amendment	[REDACTED]	1639
5/30/2012	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED]	-	Identified contact regarding Inhofe amendment	[REDACTED]	1640

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
5/30/2012	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED] [REDACTED]	-	Email detailing [REDACTED] and State Department's views on the Inhofe amendment	[REDACTED]	1641
5/31/2012	C	[REDACTED] DMP	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates <b>Cc:</b> [REDACTED] [REDACTED]	-	Forwarding information from to Gates regarding Inhofe amendment	[REDACTED]	1644
6/1/2012	P	[REDACTED]	-	-	Memo detailing proposed outreach list for SA Legal Report	Members of the House and Senate; National Security Council; State Department; Department of Justice	1354
6/8/2012	P	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED]	-	Email discussion regarding FARA filing and outreach to Hill staffers	Democratic Hill staffers	1648

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
6/8/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Continued discussions regarding FARA filing and outreach to Hill staffers	Democratic Hill staffers	1649
6/11/2012	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED] <b>Attendees:</b> [REDACTED]	-	Ukraine/ECFMU messaging meeting scheduled and includes the following attached documents: ECFMU Talking Points; UKR Hill Outreach; Centre Q A V2; ECFMU Launches US Allies Project; ECFMU Website Changes	Senate/House Committees on Foreign Affairs	1419
6/12/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Summary of call about Ukraine with Rick Gates, which addresses FARA, meeting with an Ambassador, and outreach for Inhofe/Durbin resolutions	Congress regarding Inhofe and Durbin resolutions	1652
6/13/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Email regarding FARA and identifying Republican staffers	Hill staffers (Republican and Democratic)	1653
6/19/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Coordinating meetings for [REDACTED] and working with Gates to draft an op-ed for the President regarding the EURO 2012 soccer championship.	White House; Capitol Hill	1655
6/22/2012	P	[REDACTED]	<b>r Organizer:</b> [REDACTED]	-	Meeting scheduled re: Inhofe resolution	[REDACTED]	1423

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
6/25/2012	P	[REDACTED] DMP	<b>From:</b> PJM <b>To:</b> RG; KK; [REDACTED] [REDACTED]	From	Memo from Manafort proposing a strategy to go on offense against criticism of the Ukrainian government. Gates will direct the collaborative government relations outreach plan.	"western governments" (entities not specified)	503
6/25/2012	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED] [REDACTED] <b>Attendees:</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED]	-	Meeting scheduled with House staffers as representatives of [REDACTED]	[REDACTED] [REDACTED]	1424
7/2/2012	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED] [REDACTED]	-	Email conversation about a release from ECFMU stating that [REDACTED] provides information to Ukraine's elected officials. [REDACTED] writes, "We do?". [REDACTED] responds, "Definitely. 24-7."	"American government" (entities not specified)	1659
7/8/2012	P	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] [REDACTED]	-	Referring to a letter from Yakunovich to [REDACTED] regarding Tymoshenko, Gates requests to talk to [REDACTED].	White House	1663
7/10/2012	P	DMP	<b>From:</b> Paul Manafort <b>To:</b> Rick Gates	From	Memo outlining key talking points by Ukrainian politician, [REDACTED], during [REDACTED]'s upcoming visit to the US	House; Senate (Both per [REDACTED]'s itinerary)	506

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
7/10/2012	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] (Podesta) <b>Cc:</b> [REDACTED]	-	Email draft, for [REDACTED], providing a summary of [REDACTED]'s 4-day visit, as relayed by Gates and [REDACTED].	[REDACTED]	1665
7/11/2012	P	DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Discussion about approval from Manafort to arrange meetings with the Hill for scheduled Ukrainian delegation's US visit.	Congressional members and/or staffers	1107
7/12/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Email containing a draft 650 word op-ed for US audience and a proposed itinerary of [REDACTED]'s visit to the US	[REDACTED]	1108

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
7/16/2012	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED]	-	Email to [REDACTED] providing a summary of [REDACTED]'s 4-day visit, as relayed by Gates and [REDACTED]	[REDACTED]	1670
7/17/2012	P	[REDACTED]	<b>To:</b> [REDACTED] [REDACTED] [REDACTED]	-	Email summary of meeting between [REDACTED], Gates, and [REDACTED] detailing efforts regarding Ukraine, to include Smith resolution (H. RES. 730)	[REDACTED]	1672
8/5/2012	P	ECFMU; DMP	<b>To:</b> JM [REDACTED] <b>Cc:</b> [REDACTED]	From	Email containining government relations plan	European government entities	508
8/7/2012	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED]	-	Email containing draft summary, "per Rick's requests" of meetings scheduled and work done by [REDACTED] and [REDACTED] in regarding to past US visits by [REDACTED] government officials	Members of the House and Senate; relevant subcommittees	1674

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
8/24/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Email from [REDACTED] to [REDACTED] team on potential strategy and tactics for ECFMU going forward, as requested by Gates.	Senate Leadership; House Leadership; House [REDACTED] [REDACTED] [REDACTED]; Congressional staffers	1677
8/27/2012	P	DMP; [REDACTED]	(Email chain) <b>Participants:</b> Paul Manafort; Rick Gates; [REDACTED]	From	Email chain originating from Manafort to Gates regarding recommendation for [REDACTED] to call [REDACTED] after the [REDACTED]. Manafort requests Gates vet recommendation with [REDACTED].	[REDACTED]	1679
8/30/2012	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Email from Gates to [REDACTED] team requesting facilitation of meetings for [REDACTED]	[REDACTED] or Senior Senator	1682



## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
9/6/2012	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Ambassador [REDACTED] [REDACTED]	-	Podesta arranges meetings for Ambassador [REDACTED] at the [REDACTED]. [REDACTED] meets with [REDACTED].	-	1683
9/10/2012	P	[REDACTED] DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED] [REDACTED]	-	Scheduling meetings for an upcoming visit by [REDACTED]	[REDACTED]	1684
9/11/2012	P; C	[REDACTED] DMP	<b>To:</b> Rick Gates [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	-	Email with itinerary for [REDACTED] [REDACTED]'s visit to DC and a request from Gates with final meeting updates	[REDACTED]	1685

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
9/13/2012	P	[REDACTED] ECFMU;	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] (ECFMU); [REDACTED] (ECFMU) <b>Cc:</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	-	Email containing draft itinerary of scheduled meetings for [REDACTED]'s visit	[REDACTED] Human Rights Commission; Helsinki Commission; Senate Foreign Relations Committee; House Foreign Affairs Committee; Congressional Ukrainian Caucus - Senior Staff	1688
9/13/2012	C	ECFMU; [REDACTED]	<b>From:</b> [REDACTED] (ECFMU) <b>To:</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] (ECFMU)	-	Request for draft itinerary for [REDACTED]'s visit	[REDACTED] Human Rights Commission; Helsinki Commission; Senate Foreign Relations Committee; House Foreign Affairs Committee; Congressional Ukrainian Caucus - Senior Staff	1689
9/14/2012	P	DMP; [REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates; [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED]	-	Email discussing strategy to connect with Senators opposed to the Senate Resolution [REDACTED] (re: release of [REDACTED])	Senate; [REDACTED]	1691
9/14/2012	C	[REDACTED]	[REDACTED] <b>To:</b> [REDACTED]	-	Outreach to Senate staffer regarding Senate Resolution [REDACTED] (re: release of [REDACTED])	[REDACTED]	1692

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
9/15/2012	P	DMP	<b>From:</b> Paul Manafort <b>To:</b> Rick Gates <b>Cc:</b> Konstantin Kilimnik	From; Author/Last Saved	Memo from Manafort advising aggressive short term strategy plan titled <i>Pre-Election Lobby Plan</i>	[REDACTED]; State Department	589
9/17/2012	P	[REDACTED] DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Gates delegates taskings for outreach to House and Senate members regarding Inhofe and Smith resolution	[REDACTED]	1695
9/17/2012	P	[REDACTED]; DMP	(Email chain) <b>Participants:</b> Rick Gates; [REDACTED]	-	Providing Gates updates on House/Senate resolutions against Ukraine in preparation for Manafort's meeting with the President. [REDACTED] confirms clearance to discuss pending report.	[REDACTED]	1696
9/17/2012	C	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates; [REDACTED] <b>Cc:</b> [REDACTED]	-	Email update to Gates on Inhofe/Durbin resolution	[REDACTED] staffers	1697

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
9/17/2012	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Email update with direct feedback regarding Durbin resolution	[REDACTED]	1698
9/18/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Gates requesting email of Congressional contacts made by [REDACTED], and [REDACTED].	Congress	1699
9/19/2012	P	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED] Konstantin Kilimnik	Referenced	Idea proposed by [REDACTED] for further outreach to Senate re: resolution on Tymoshenko's release; mention of PM's work	[REDACTED]	1172
9/19/2012	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Confirmation of contact to Senate re: resolution on Tymoshenko's release	[REDACTED]	1173
9/19/2012	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Email confirmation from [REDACTED] with subject line "am working on USA matter"	[REDACTED]	1174
9/19/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Email detailing follow-up pending regarding Senate contact	[REDACTED]	1175
9/19/2012	C	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates confirms hearing re: resolution on [REDACTED] is finished.	[REDACTED]	1176
9/19/2012	C	[REDACTED]; DMP	(Email chain) <b>Participants:</b> Paul Manafort; Rick Gates; [REDACTED] Konstantin Kilimnik; [REDACTED]	Cc	Manafort directed urgent contact recommendations to Gates regarding Senate resolution on [REDACTED]	[REDACTED]	1308

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
9/19/2012	C	[REDACTED]	(Email chain) Participants: [REDACTED]	-	Email chain discussing disinterest in using email as means of communication, strategies for Senate contact, and confirmation that Senate passed the resolution	[REDACTED]	1702
9/19/2012	C	[REDACTED]	From: [REDACTED] To: Rick Gates	-	Gates requests oral transmission of message from [REDACTED] President [REDACTED] to [REDACTED]. [REDACTED] confirms message delivered as voicemail.	[REDACTED]	1703
9/19/2012	C	[REDACTED]	From: [REDACTED] To: [REDACTED]	-	Contact made with Senate staffer regarding resolution on Ukraine	[REDACTED]	1917
9/20/2012	C	[REDACTED]; DMP	(Email chain) Participants: [REDACTED] Gates; [REDACTED]	-	Email discussing progress of Sen. Res. [REDACTED], Senate procedures, and Senate contacts.	[REDACTED]	1705

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
9/20/2012	P	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates (Email chain) <b>Participants:</b> [REDACTED]	-	Providing Gates an update on Podesta's scheduled call with [REDACTED]	[REDACTED]	1706
9/20/2012	P	[REDACTED]; DMP	[REDACTED]	-	Coordination of outreach after Sen. Res. [REDACTED] has been hotlined	[REDACTED]	1707
9/20/2012	C	[REDACTED]; DMP	(Email chain) <b>Participants:</b> Rick Gates [REDACTED]	-	Gates emails [REDACTED] a document on [REDACTED] noting a Ukranian investor, to give to [REDACTED]. [REDACTED] requests confirmation from [REDACTED] about [REDACTED]'s PAC and West Virginia Senate elections.	[REDACTED]; [REDACTED] Senate	1708
9/20/2012	P	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	Email confirmation of pending call with Senator, request for updates from Gates, and [REDACTED] Senate outreach	[REDACTED]	1709
9/21/2012	C	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates [REDACTED]	-	Providing Gates with an update on Senate resolution	[REDACTED]	1710

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
9/21/2012	C	[REDACTED]; DMP;	(Email chain) <b>Participants:</b> [REDACTED] [REDACTED] Rick Gates [REDACTED] [REDACTED]	-	Email discussing Senate procedures, to include anonymity for Senators requesting resolution hold and schedule for vote on resolution	Senate	1711
9/22/2012	C	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED] [REDACTED] [REDACTED]	-	Email references call between [REDACTED] and [REDACTED] and the Durbin resolution	[REDACTED]	1712
9/22/2012	C	[REDACTED]; DMP	(Email chain) <b>Participants:</b> [REDACTED] Rick Gates, [REDACTED] [REDACTED]	-	Email conversation following vote on Senate resolution. Confirmation received that the resolution was passed.	Senate	1714



## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
9/22/2012	C	[REDACTED]; DMP	(Email chain) <b>Participants:</b> [REDACTED] [REDACTED] Rick Gates	-	Gates confirms that there will be no strategy change despite Sen. Res. [REDACTED] being hotlined.	Email list serv for the Senate	1715
9/22/2012	C	[REDACTED]; DMP	(Email chain) <b>Participants:</b> Tony Podesta (Podesta); Rick Gates, [REDACTED] [REDACTED]	-	Gates sends an OpEd for [REDACTED] to pass along to [REDACTED] confirms call with [REDACTED].	[REDACTED]	1719
9/22/2012	P	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED]	-	Email relays [REDACTED] outreach to speak with [REDACTED] re: Ukraine resolution	[REDACTED]	1720
9/23/2012	P	[REDACTED]; DMP	<b>From:</b> Jonathan [REDACTED] [REDACTED] <b>To:</b> Paul Manafort; Rick Gates; [REDACTED] [REDACTED]	To	[REDACTED] circulates documents and an agenda for H-Club meeting. The agenda includes topic of "International Activity", where "GC" and "USA" are listed.	USA (entity not specified)	1374

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
9/24/2012	C	DMP	<b>From:</b> PJM <b>To:</b> VFY	From; Author/Last Saved	Manafort provides VFY with a strategy update regarding Durbin resolution.	White House; State Department; [REDACTED]	594
9/24/2012	P	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	Gates, after speaking with Manafort, prioritizes a meeting request with SL.	[REDACTED]	1721
9/24/2012	C	[REDACTED]; DMP	(Email chain) <b>Participants:</b> Rick Gates; [REDACTED]	-	Gates forwards update on Tymoshenko's health, for [REDACTED] awareness. [REDACTED] forwards to a contact.	[REDACTED]	1723
9/24/2012	P	[REDACTED]; DMP	(Email chain) <b>Participants:</b> Rick Gates; [REDACTED]	-	Gates requests assistance in arranging meetings for upcoming US visit by Yanukovich's Chief of Staff	[REDACTED]	1724
9/26/2012	P	[REDACTED]; [REDACTED]	[REDACTED]	-	Strategic project map and memo, referencing Ukraine engagement, for Washington, DC consultants	Washington, DC consultants	1377

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
9/27/2012	P	[REDACTED]; [REDACTED]; [REDACTED]; DMP	From: Rick Gates To: [REDACTED]	-	Gates sends a meeting agenda for "DC Consultants" meeting on September 26, 2016 containing "Overview and Comments from Kiev"	[REDACTED]	1726
10/1/2012	P	[REDACTED]	(Email chain) Participants: [REDACTED]	-	Strategy plan by [REDACTED]	[REDACTED] Senators who have resigned, were defeated, or are retiring; Former and current government officials; [REDACTED]	1727

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
10/1/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Conference call scheduled to discuss ECFMU/Ukraine and "Engage" Ukraine project map/matrix	[REDACTED]	1728
10/2/2012	P	DMP: [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates sends [REDACTED] "DC Consultants Plan 9-28-1012.xlsx" and references a prior phone call.	[REDACTED]	1390

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
10/2/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Email requesting a proposal for an intensive, one month government relations outreach effort	Capital Hill; State Department	1602
10/3/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Edits are forwarded from [REDACTED] for the "Ukraine Election Work Plan"	Ukraine Caucus; [REDACTED] [REDACTED] Helsinki Commission; House; Senate; [REDACTED]	1731
10/3/2012	C	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Gates comments [REDACTED] call with [REDACTED] is a breakthrough.	[REDACTED]	1732

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
10/9/2012	P	DMP	-	Author	PM memo titled "Observer Group Strategy Team" regarding dealing with election observers. PM has PJM/AK/Kozhara in charge of overall strategy with [REDACTED] over Europe and RG/[REDACTED] over US.	US delegations to Ukraine	517
10/10/2012	P	[REDACTED]; DMP;	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates emails pre-meeting note highlighting need for a plan to deflect the lies and distortions of the opposition "as the election gets closer and it begins to become apparent that the PoR is going to win..."	References pre-election GR plan (entity is not specified)	1735
10/11/2012	P	ECFMU: [REDACTED] [REDACTED] DMP	<b>From:</b> [REDACTED] (ECFMU) <b>To:</b> [REDACTED] [REDACTED] Rick Gates; [REDACTED] <b>Cc:</b> [REDACTED]	-	[REDACTED] writes asking who from the PoR should visit DC directly after elections.	[REDACTED]	1736

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
10/14/2012	P	DMP	<b>From:</b> Paul Manafort <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED] Rick Gates	From	Manafort emails multiple attachments to Young regarding Ukraine elections, advising Young to draft an additional memo. One attachment contains talking points for Ohkendovsky's US visit	Senate; House	597
10/15/2012	A; C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED] <b>From:</b> [REDACTED] <b>To:</b> Rick Gates <b>Cc:</b> [REDACTED] <b>Fwd:</b> [REDACTED] [REDACTED]	-	Antelo describes no longer receiving calls from State Department contact, suspecting "[they] did some reasearch on [REDACTED] and determined [REDACTED] was on the "other side".	[REDACTED]	1737
10/15/2012	C	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates <b>Cc:</b> [REDACTED] <b>Fwd:</b> [REDACTED] [REDACTED]	-	Contact made with State department following article release suggesting [REDACTED] advocates for Tymoshenko's release.	State Department	1738
10/16/2012	C	[REDACTED]	<b>m:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED]	-	[REDACTED] provides update on Ukrainian Caucus staffers with positive responses for potentially serving as election observers.	[REDACTED]	1739



## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
10/16/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	[REDACTED] forwards an email from Gates, which requests "[completing a] report for each person [they] contact in relation to Ukraine and the election and send these reports to [Gates] DAILY".	Entities, as defined in the pre- and post- election strategy plans	1740
10/17/2012	P	[REDACTED]	-	-	Draft letters addressed to Congressional members on behalf of Ukraine	[REDACTED]	1741
10/17/2012	C	[REDACTED]	-	-	Daily outreach report from [REDACTED]	[REDACTED]	1742
10/17/2012	C	[REDACTED]	-	-	Daily outreach report from [REDACTED]	[REDACTED]	1743
10/18/2012	C	[REDACTED]	-	-	Daily outreach report from [REDACTED] [REDACTED]	[REDACTED]	1431

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
10/18/2012	P; C	[REDACTED]; DMP	(Email chain) <b>Participants:</b> [REDACTED]  Rick Gates; [REDACTED]	-	Email chain coordinating outreach to House/Senate	[REDACTED]	1744
10/19/2012	P; C	DMP	<b>From:</b> Rick Gates <b>To:</b> Rick Gates	-	Gates' email advises the team's efforts "are noticed in Kyiv" and advised to remain aggressive.	Current outreach strategy	1745
10/22/2012	P	-	<b>Individuals:</b> [REDACTED]	-	List of tasks related to the Ukraine project (PDG00018676-15)	Senate; House	1746
10/23/2012	P; C	[REDACTED]	<b>From:</b> [REDACTED]  <b>To:</b> [REDACTED]  <b>Cc:</b> [REDACTED]	-	Update on phone call and delegation of tasks regarding Smith resolution	[REDACTED]	1748
10/23/2012	P	[REDACTED]	<b>From:</b> [REDACTED]  <b>To:</b> [REDACTED]	-	Email from Gates is forwarded by [REDACTED] to obtain strategy plan for outreach re: Durbin and Smith resolution	[REDACTED]	1749
10/29/2012	C	[REDACTED]; DMP	<b>Individuals:</b> [REDACTED] Gates; [REDACTED]	-	[REDACTED] Group sending "contact reports" to Gates and Ina	-	1942

## Government Relations Activity

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10/29/2012	C	[REDACTED]; DMP	<b>Individuals:</b> [REDACTED] <b>Gates:</b> [REDACTED]	-	[REDACTED] sending "contact reports" to Gates and [REDACTED]	-	1943
10/30/2012	P	[REDACTED]; DMP	(Email chain) <b>Participants:</b> Paul Manafort; [REDACTED] [REDACTED] ick Gates;	From	Gates forwards an email from Manafort to [REDACTED] requesting a separate strategy for outreach.	White House; Natonal Security Council	1751
10/31/2012	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Tavlarides forwards a comment from COS for more balanced information on Ukraine.	[REDACTED]	1752
10/31/2012	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Draft daily report perceived as "more balanced" for distribution to contacts	State Department; House; Senate	1753
10/31/2012	C	[REDACTED]	<b>Individuals:</b> [REDACTED]	-	Contact reports sent from Podesta Group to Gates and Kirsch	-	1754
10/31/2012	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	CA sends final version of Hill report (PDG00035025) to [REDACTED] staff on behalf of ECFMU	[REDACTED]	1755

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
11/1/2012	P	[REDACTED]; DMP;	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates emails a request to stop a WH statement on Ukraine elections following negative public statements by State Department and includes VY's perception of the statements.	White House; State Department	1756
11/9/2012	P	[REDACTED]; DMP	(Email chain) <b>Participants:</b> Rick Gates; [REDACTED]  [REDACTED] (ECFMU); [REDACTED]	-	PDG confirms covering Helsinki Commission meetings	Helsinki Commission	1230
11/14/2012	P	[REDACTED]; DMP	(Email chain) <b>Participants:</b> [REDACTED] Rick Gates (Podesta); [REDACTED]	-	Gates wants to know why they were unaware of a call between VP and Yanukovich.	White House Press Office List Serv	1760

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
11/19/2012	P	[REDACTED] ECFMU; DMP; [REDACTED]	<b>Affiliates:</b> [REDACTED] <b>(ECFMU):</b> [REDACTED]	-	Post-election Public Affair Plan through end of 2012 sent from [REDACTED] to ECFMU	White House; National Security Council; State Department; House; Senate	1761
11/20/2012	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED] <b>Attendees:</b> [REDACTED]	-	Calendar invite for internal Ukraine call re: Yefremov visit	[REDACTED]	1439
11/20/2012	P	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates; [REDACTED]	-	Request to Gates for confirmation of arranging meetings for [REDACTED] November visit	Democratic Congressional staff	1762

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
11/26/2012	P	[REDACTED]; DMP	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates	-	[REDACTED] updates strategy guide	[REDACTED]	1397
11/29/2012	C	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	-	[REDACTED] draft response to Gates' request for a recap of the year's includes outreach for the Smith and Durbin resolutions.	Capitol Hill	1764
11/29/2012	P	[REDACTED]; DMP	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates <b>Cc:</b> [REDACTED] [REDACTED] [REDACTED]	-	Gates requests an update on the project for an assessment to brief VFY and characterized as an assessment by Manafort.	Capitol Hill	1766

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
12/6/2012	P	[REDACTED]; DMP; [REDACTED] DMP	(Email chain) <b>Participants:</b> [REDACTED] [REDACTED] Gates; Kilimnik; Manafort	Cc	Documents, including strategy plans, for SA report that have been edited by Manafort	[REDACTED]	1400
12/11/2012	P	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED]	-	Summary of phone call with Gates advising hand-delivered copies of the Skadden report go to Congress.	[REDACTED]	1771

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
12/14/2012	P	[REDACTED]; DMP	From: [REDACTED] To: Rick Gates	Referenced	Email titled "Government Relations Strategy - ECFMU"	Manfort meetings: [REDACTED]	1448
12/14/2012	P	[REDACTED]; DMP	(Email chain) Participants: - [REDACTED] Rick Gates: [REDACTED]		[REDACTED] Engage Ukraine 2013 Strategy	[REDACTED]	1772



## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
12/15/2012	P; C	[REDACTED]; DMP	(Email chain) <b>Participants:</b> [REDACTED] <b>Rick Gates:</b> [REDACTED]	-	Gates confirms sharing the State press briefing in Kiev and advises request for a direct statement from State/WH and arrangement of briefings.	State Department; White House; [REDACTED]	1936
12/19/2012	P	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	List of [REDACTED] as discussed with Gates	[REDACTED]	1450
2013	P	[REDACTED]		-	Document (Strategy Plan - <i>Engage Ukraine 2013</i> )	Congress; Executive Branch	1775
1/16/2013	C	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	(Memo) From	Gates forwards a memo from Manafort to Yakunovich re: US Congressional Resolutions H. Res. 27 and H. Res. 28, describing [REDACTED] work	[REDACTED]	1453
1/21/2013	P	[REDACTED]; DMP	(Email chain) <b>Participants:</b> [REDACTED]	-	Gates proposes lists of contacts to reach out to in anticipation of Tymoshenko's daughter's upcoming visit.	[REDACTED]	1454

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
1/31/2013	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	DC meetings scheduled for Ukrainian MP [REDACTED]	[REDACTED]	1780
2/4/2013	C	DMP	<b>From:</b> PJM <b>To:</b> President VFY	-	Manafort memo to VY summarizes key US activity, including changes in Congress and pending resolutions	[REDACTED]	604
2/13/2013	P	DMP; [REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Gates is requesting updates from the team on their contact with a prioritized list of individuals. Additionally, he is looking for information on the Magnitsky Act.	[REDACTED]	1464

## Government Relations Activity

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2/18/2013	P; C	DMP; [REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	Gates forwards draft document from [REDACTED] and provides list of potential meetings to schedule for [REDACTED] visit	[REDACTED]	1466
2/18/2013	P	DMP; [REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	Gates further directs priorities for meeting arrangements for [REDACTED] visit	House Foreign Affairs Committee; Senate Foreign Relations Committee	1467
2/18/2013	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] Rick Gates <b>Cc:</b> [REDACTED]	-	Wright sends requested updates/contacts to Gates.	[REDACTED]	1784
2/19/2013	C	DMP	M <b>To:</b> President VFY	From; Author/Last Saved	Memo to VFY regarding "actions taken by [the] US consultants team in support of Ukraine's priorities"	Administration; Congress	605

## Government Relations Activity

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2/19/2013	P	[REDACTED]; DMP;	(Email chain) <b>Participants:</b> [REDACTED]	-	Gates organizing [REDACTED] work plan meeting based on "info from Kyiv."	[REDACTED]	1465
2/21/2013	P	DMP	<b>From:</b> PJM <b>To:</b> President VFY	From; Author/Last Saved	PM memo to VY re Hapsburg Update to include plan to deploy to U.S. "By expanding the presence of the Hapsburg team to the US this year...leverage the team's experience, expertise, and network of high profile EU and US officials behind the scenes as much as possible."	Administration officials; [REDACTED]	606
2/21/2013	P	DMP	<b>From:</b> [REDACTED] <b>To:</b> Konstantin Kilimnik	(Memo) From	Manfort memo to VFY re: Engage Ukraine Strategy for 2013	White House; Department of State; Congress	607
2/22/2013	P	DMP	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	[REDACTED] email regarding request for meetings on behalf of [REDACTED] Forwards information sent to Manafort.	White House; Congress	1315
2/23/2013	P	DMP	(Email chain) <b>Participants:</b> [REDACTED] [REDACTED] ick Gates; Paul Manafort	Cc	Email coordinating meetings for [REDACTED]	White House; Congress	1316

## Government Relations Activity

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2/24/2013	P; C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Author/Last Saved	Email update on [REDACTED] and RP's visit/meeting agenda	Congress; Administration officials; [REDACTED]	691
2/25/2013	P	DMP	<b>From:</b> Friedman <b>To:</b> Rick Gates; [REDACTED] [REDACTED]	-	Updated talking points for [REDACTED] [REDACTED] trips that are "more American"	-	1318
2/25/2013	C	DMP; [REDACTED] [REDACTED]	(Email chain) <b>Participants:</b> Rick Gates; [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	-	Outreach for meetings with Kwasniewski	[REDACTED] [REDACTED]	1469
2/26/2013	C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Author/Last Saved	Positive update on [REDACTED] US visit	[REDACTED] [REDACTED]	692
2/27/2013	P	DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED] Paul Manafort	Cc	Gates provides priority meetings for [REDACTED] visit	House; Senate; Senate Foreign Relations Committee	1320
2/27/2013	P	DMP	<b>From:</b> Friedman <b>To:</b> Paul Manafort; [REDACTED] [REDACTED] Konstantin Kilimnik	To	[REDACTED] emails updates from [REDACTED]; mentions [REDACTED] DC trip	political meetings	1321
2/27/2013	P	DMP; [REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates <b>Cc:</b> [REDACTED] [REDACTED]	-	More congressional outreaches for [REDACTED] visit	[REDACTED]	1471
2/28/2013	C	DMP	<b>From:</b> Rick Gates <b>To:</b> Paul Manafort <b>Cc:</b> [REDACTED] [REDACTED]	To	Gates provided talking point to [REDACTED] re: meetings	-	1322

## Government Relations Activity

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3/1/2013	C	DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> Paul Manafort	Cc	Gates sends final meeting agenda for [REDACTED]	-	1324
3/1/2013	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED] <b>Attendees:</b> [REDACTED]	-	Calendar invite detailing [REDACTED] meetings	[REDACTED]	1473
3/2/2013	P; C	DMP	-	Author/Last Saved	Memo from Manafort with updates from previous visits and future meetings/taskings	[REDACTED]	693
3/3/2013	P	DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Meeting letter request from [REDACTED] to [REDACTED]	[REDACTED]	1262
3/3/2013	C	DMP	<b>From:</b> Rick Gates <b>To:</b> Paul Manafort; [REDACTED]	To	Gates provides positive updates on [REDACTED] visit	All scheduled meetings attended	1326

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
3/3/2013	P	DMP; [REDACTED]	From: [REDACTED] [REDACTED] To: Rick Gates Cc: [REDACTED] [REDACTED]	-	Memo sent to Gates re: [REDACTED] to form strategy for out	[REDACTED]	1789
3/4/2013	P	DMP	From: Rick Gates To: [REDACTED]	-	Meeting letter request from [REDACTED] [REDACTED]	[REDACTED]	1263
3/4/2013	P	DMP	From: Friedman To: [REDACTED] Cc: [REDACTED]	-	[REDACTED] sends [REDACTED] draft letter to [REDACTED] advising to send back to get put on letterhead.	[REDACTED]	1264
3/4/2013	P	DMP	From: Rick Gates To: [REDACTED]	-	Gates sends draft letters from [REDACTED] intended for [REDACTED] was unable to meet with while in DC	Congress	1265
3/4/2013	P	DMP	From: Rick Gates To: [REDACTED]	-	Gates advises [REDACTED] draft letter to [REDACTED] can be sent to "our guys in DC" for review	[REDACTED]	1266
3/4/2013	P	DMP	From: Rick Gates To: [REDACTED]	-	Gates provides directions on how to submit letter from [REDACTED] to [REDACTED]	[REDACTED]	1267
3/4/2013	P	DMP; [REDACTED]	From: Rick Gates To: [REDACTED] Cc: [REDACTED] [REDACTED]	-	Arranging Manafort meetings and additional contact	[REDACTED]	1474

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
3/5/2013	P;C	DMP	-	-	PM memo to VY re █████ visit to US and "I (PM) have begun to provide background briefings to the █████ I am using a several key influencers within the State Department to ensure that █████ is prepared upon his arrival to Kyiv."	█████; State Department	609
3/5/2013	P	DMP; █████	<b>From:</b> █████ <b>To:</b> █████ <b>Cc:</b> █████	-	█████ re: Gates Washington, DC visits	-	1270
3/5/2013	P	DMP	<b>From:</b> Rick Gates	-	Gates provides update on █████ scheduled meetings	█████	1271
3/5/2013	P	█████	<b>From:</b> █████ <b>To:</b> █████ <b>Cc:</b> █████	-	Draft letter from █████	█████	1272
3/5/2013	P	DMP; █████	<b>From:</b> Rick Gates <b>To:</b> Paul Manafort; █████	To	█████ anticipated meeting schedule	█████	1327
3/5/2013	P	DMP; █████	(Email chain) <b>Participants:</b> █████	-	Gates priorities for █████ visit	█████	1476



## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
3/6/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Confirmation of additional meeting for [REDACTED]	[REDACTED]	1477
3/7/2013	P	DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates requests draft letter is forwarded to White House officials	[REDACTED]	1273
3/7/2013	P	DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Copy of [REDACTED] draft letter requesting to be forwarded	-	1328
3/7/2013	P	[REDACTED] DMP	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Draft meeting schedule for [REDACTED]'s visit	[REDACTED]	1790
3/8/2013	P	DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates is working on talking points for [REDACTED] Congressional meetings	[REDACTED]	1330

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
3/8/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> Paul Manafort <b>Cc:</b> [REDACTED]	-	Gates emails [REDACTED] agenda, visit PoCs, and a draft speech	[REDACTED]	1331
3/10/2013	P	DMP	<b>From:</b> Rick Gates <b>To:</b> Paul Manafort; [REDACTED]	-	Updated agenda for [REDACTED] visit	[REDACTED];	1333
3/11/2013	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	[REDACTED] visit agenda email [REDACTED] [REDACTED] Secretary Kerry not likely	[REDACTED]	1792

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
3/12/2013	P	DMP	<b>From:</b> Konstantin Kilimnik <b>To:</b> [REDACTED]	-	Kilimnik sends [REDACTED] briefing book with the message (in Russian): this week Paul organized a visit by [REDACTED] to Washington. The briefing book lists [REDACTED] and Gates as author/modified-by.	[REDACTED]	610
3/12/2013	p	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] [REDACTED] Paul Manafort	-	Gates sends a draft briefing book on [REDACTED] visit containing meeting schedules	[REDACTED]	1335
3/12/2013	P	DMP; [REDACTED] [REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates; [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED]	-	[REDACTED] agenda is emailed	[REDACTED]	1478

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
3/13/2013	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	Referenced	[REDACTED] provides first day updates re: [REDACTED] visit and corroboration from Manafort	[REDACTED]	1275
3/13/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Update on [REDACTED] schedule and pending meetings	National Security Council meetings still pending	1479
3/14/2013	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] (ECFMU); Rick Gates <b>Cc:</b> [REDACTED]	-	Update on [REDACTED] meeting with House representative	[REDACTED]	1342
3/14/2013	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED] <b>Attendees:</b> [REDACTED]	-	Calendar invite detailing meeting w/ [REDACTED], provides his background information, and highlights [REDACTED] policy on areas of interest (Ukraine/Russia)	[REDACTED]	1481

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
3/14/2013	P	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates; Paul Manafort <b>Cc:</b> [REDACTED] [REDACTED]	To	Calendar update for meeting changes between Manafort and Congress	[REDACTED]	1482
3/14/2013	P	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED] [REDACTED]	-	Target list for [REDACTED]'s upcoming visit includes outreach to Congress	[REDACTED] State Department	1793
3/15/2013	C	DMP	<b>To:</b> Paul Manafort <b>Cc:</b> Rick Gates; Konstantin Kilimnik	To	Sager sends memo summarizing [REDACTED]'s trip to DC	-	1343
3/16/2013	C	DMP	<b>From:</b> Konstantin Kilimnik <b>To:</b> [REDACTED]	-	Kilimnik confirms opening [REDACTED]'s memo re: [REDACTED]'s visit	-	611
3/16/2013	C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From	Memo on [REDACTED]'s visit discusses bi-lateral meetings	[REDACTED]	694

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
3/17/2013	C	[REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Gates emails [REDACTED] requesting a readout on interviews from [REDACTED]'s trip, but highlights the success of the GR meetings.	-	1794
3/18/2013	C	DMP; [REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> Paul Manafort	To	Memo to PM re: upcoming briefings, Q&A about ECFMU and a question about FARA.	[REDACTED]	1484
3/18/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	Referenced	Update on Paul Manafort's scheduled DC meetings	[REDACTED]	1485
3/18/2013	P	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates <b>Cc:</b> [REDACTED]	-	Talking points for the President are sent to Gates, address Congressional sanctions	Congress	1795
3/18/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates	-	Gates request talking points for the President's meeting with [REDACTED]	[REDACTED]	1797
3/19/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	Referenced	Read message confirmation for subject [REDACTED].."	[REDACTED]	1488
3/21/2013	P	DMP	-	Author/Last Saved	Gates Agenda for 3/21/13; Discusses GR and PR in US	[REDACTED]	613

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
3/23/2013	P	DMP	<b>From:</b> PJM <b>To:</b> SL	Last Saved	Memo on US Consultants weekly activities	[REDACTED]	695
3/25/2013	P	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] (ECFMU)	-	[REDACTED] memo to [REDACTED] regarding [REDACTED] [REDACTED] visit to DC; congressional and press outreach	[REDACTED]	1800
3/27/2013	C	[REDACTED]; DMP; ECFMU	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates; [REDACTED] (ECFMU) <b>Cc:</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	-	Readout on [REDACTED] meeting with [REDACTED]	[REDACTED]	1801

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
3/28/2013	C	[REDACTED]; DMP; ECFMU	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates; [REDACTED] (ECFMU) <b>Cc:</b> [REDACTED]	-	Readout on [REDACTED] meeting with State Department	[REDACTED]	1803
4/6/2013	P	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	Proposed GR strategy plan by PDG and M/CW	[REDACTED]	1805
4/7/2013	P	DMP	<b>From:</b> PJM <b>To:</b> VY	From; Author/Last Saved	Memo from Manafort re: Hapsburg update - April/May plan. "This phase centers around a high-level and intense private effort at back-channel diplomacy focused on senior U.S. and European officials."	-	696



## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
4/8/2013	P	DMP; ██████████	From: Rick Gates To: ██████████	-	Gates email containing document strategy re: ██████████ that has been "submitted to Kyiv and approved"	██████████	1806
4/15/2013	P	DMP; ██████████	From: ██████████ To: ██████████ Cc: ██████████; Rick Gates	-	Email from Kirsch detailing ██████████ interest in meeting with identified contacts during US trip	██████████	1809
4/19/2013	P	██████████; DMP	From: ██████████ To: Rick Gates (Email chain)	-	Update on ██████████ work	██████████	1492
4/19/2013	P	██████████; DMP	Participants: Rick Gates; ██████████	-	Ukraine Quarterly update sent to Gates for highlights to go to Manafort	██████████	1810

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
4/21/2013	C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Last Saved	US Consultants Activity - Weekly Update	White House; Senate; House; State Department	697
4/22/2013	C	DMP	<b>From:</b> PJM <b>To:</b> President VFY	From; Last Saved	Manfort memo re: Quarterly Report on US Consultants activity	White House; Senate; House; State Department	616
4/25/2013	C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Author/Last Saved	Manfort sends an updated ledger of summary of accounts overdue and writes "I have paid out all of Hapsburg and all but one month of the US operations out of my pocket."	US Lobbying	617
4/25/2013	P	DMP	-	Author/Last Saved	Outline from Manafort detailing GR outreach	[REDACTED]	699
4/25/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates details taskings after Manafort's meeting with the Minister	[REDACTED]	712
4/25/2013	P	DMP; [REDACTED]	<b>Calendar Organizer:</b> [REDACTED]	-	Subject: Call Rick Gates	[REDACTED]; State Department	1939
4/26/2013	P	DMP; [REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	Email coordination to schedule meetings	[REDACTED]	1493

Government Relations Activity							
Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
4/26/2013	P	[REDACTED]	From: [REDACTED] To: [REDACTED]	-	[REDACTED] confirms outreach task	[REDACTED]	1811
5/1/2013	P	DMP; [REDACTED]	(Email chain) Participants: [REDACTED]	-	[REDACTED] confirms he requested meetings for [REDACTED]	[REDACTED]	1813
5/2/2013	P	[REDACTED]; DMP; [REDACTED]	From: [REDACTED] To: Rick Gates; [REDACTED]	-	Meeting confirmation for [REDACTED] and Manafort	[REDACTED]	1814
5/6/2013	P	[REDACTED]	From: [REDACTED] To: [REDACTED] Cc: [REDACTED]	-	Confirmation of [REDACTED] meetings	[REDACTED]	1815
5/7/2013	P	-	-	Last Saved	Agenda for [REDACTED] DC visit	[REDACTED]	700
5/7/2013	P	[REDACTED]	From: [REDACTED] To: [REDACTED] Cc: [REDACTED]	-	[REDACTED] contact w/ House re: shale gas and Ukraine reserves	[REDACTED]	1496

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
5/8/2013	P	-	-	-	Agenda for [REDACTED] Visit	[REDACTED]	701
5/8/2013	P	-	-	-	Agenda for [REDACTED] Visit	[REDACTED]	702
5/8/2013	C	-	-	-	Meeting summaries for [REDACTED] visit	[REDACTED]	703

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
5/8/2013	P	-	-	-	Meeting agenda and talking points for [REDACTED] visit	[REDACTED]	1497
5/10/2013	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED]	-	Phone call scheduled for [REDACTED] to discuss meeting with [REDACTED]	[REDACTED]	1498
5/11/2013	P	[REDACTED]	<b>From:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Email draft summary of [REDACTED] meeting	[REDACTED]	1821
5/12/2013	P	[REDACTED]	<b>From:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Email discussion to coordinate summary of meeting	[REDACTED]	1499
5/12/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Coordinating call for [REDACTED]	[REDACTED]	1822
5/13/2013	C	DMP	-	-	Meeting summaries May 13, 2013 - [REDACTED] to include read outs of each meeting with GR (Congress and DoS) and PR.	Congress	704

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
5/14/2013	C	DMP	-	-	PM memo to ██████████ re Washington DC visits - ██████████ and ██████████ which outline GR/PR meetings in DC and discuss need for continued briefing to Congress.	Congress	705
5/17/2013	C	DMP; ██████████	<b>From:</b> ██████████ <b>To:</b> Paul Manafort	Manafort Updated	██████████ accompanied ██████████ to ██████████ and official luncheon for meetings with ██████████ discussed Ukraine with ██████████	██████████	852
5/17/2013	C	DMP; ██████████	<b>From:</b> ██████████ <b>To:</b> Paul Manafort <b>cc:</b> Rick Gates; Konstantin Kilimnik	Manafort Updated	██████████ discussed the U.S. engaging the Ukraine with ██████████	██████████	853
5/21/2013	P	DMP; ██████████	<b>From:</b> Rick Gates <b>To:</b> ██████████ ██████████;	-	Gates emails ██████████ to arrange congressional staff meetings for ██████████	██████████	1417
5/22/2013	P	DMP; ██████████	(Email chain) <b>Participants:</b> ██████████ ██████████ Rick Gates; ██████████	-	E-mail discussion of visit strategy for ██████████ in June 2013, including congressional meetings	██████████	1500
5/22/2013	P	DMP; ██████████	(Email chain) <b>Participants:</b> ██████████ ██████████ Rick Gates; ██████████	-	Email regarding ██████████ visit	██████████	1501

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
5/28/2013	P	[REDACTED]; DMP;	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates <b>Cc:</b> [REDACTED] [REDACTED]	-	Agenda for [REDACTED] visit	[REDACTED]	1824
5/29/2013	P	[REDACTED]	<b>Organizer:</b> [REDACTED] [REDACTED] <b>Attendees:</b> [REDACTED] [REDACTED]	-	Meeting to discuss meeting with [REDACTED]	[REDACTED]	1503
5/30/2013	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates; [REDACTED] (ECFMU) <b>Cc:</b> [REDACTED] [REDACTED]	-	Email update from [REDACTED] about meeting	[REDACTED]	1826

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
6/4/2013	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED] <b>Attendees</b> [REDACTED]	-	Meeting scheduled	[REDACTED]	1504
6/4/2013	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED] <b>Attendees</b> [REDACTED]	-	Meeting scheduled	[REDACTED]	1505
6/4/2013	P	[REDACTED]; DMP	(Email chain) [REDACTED]; Rick Gates: [REDACTED]	-	[REDACTED] meeting schedules and update from [REDACTED] office	[REDACTED]	1509
6/4/2013	P	[REDACTED]; DMP;	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Briefing book corresponding to [REDACTED] scheduled meetings and visit	[REDACTED]	1827



## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
6/5/2013	P	██████████; ██████████; DMP	(Email chain) <b>Participants:</b> ██████████ ██████████ ██████████ ██████████	-	Additional correspondence on ██████████ visit. Gates sends briefing book, which is later updated.	-	621
6/5/2013	P	██████████; DMP	(Email chain) <b>Participants:</b> ██████████ ██████████ ██████████ ██████████ ██████████ ██████████ ██████████ ██████████	-	██████████ arranges meeting between ██████████ and ██████████ “re Ukraine.” After a rescheduling issue, ██████████ suggests rescheduling a later meeting to accommodate ██████████ rescheduled meeting with ██████████	██████████ ██████████ ██████████	622
6/6/2013	P	██████████	<b>Calendar Organizer:</b> ██████████ <b>Attendees:</b> ██████████ ██████████ ██████████ ██████████	-	Calendar meeting for ██████████ and ██████████ House; includes Representatives background information.	██████████	1507

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
6/6/2013	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED] <b>Attendees:</b> [REDACTED]	-	Calendar meeting for [REDACTED] and House; includes Representatives background information.	[REDACTED]	1508

**Government Relations Activity**

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
6/7/2013	C	[REDACTED]	From: [REDACTED] To: Rick Gates	-	Document summarizing outreach and contact made on behalf of [REDACTED]'s visit	[REDACTED]	1510

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
6/9/2013	C	-	<b>From:</b> PJM <b>To:</b> [REDACTED]	Last Saved	Summary report from Manafort on [REDACTED] trip	[REDACTED]	706
6/12/2013	C	[REDACTED]; DMP;	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates; [REDACTED]	-	[REDACTED] sends Gates a memo with an overview of the Durbin resolution, as requested by Gates	House; Senate	1830
6/17/2013	C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	Last Saved	PM memo to SL stating "I have been financing operations by a personal loan...I have new obligations to Hapsburg and the US Consultants...The work is at a peak level of impact in the US... and with selected media."	-	707

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
6/18/2013	C	[REDACTED]; DMP; ECFMU	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates; [REDACTED]	-	[REDACTED] updates Gates and [REDACTED] on recent meeting	[REDACTED]	1831
6/25/2013	P	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates suggests a Senate outreach	[REDACTED]	1835
6/25/2013	P	[REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates asks for review of memo re: Durbin resolution that may need to be used with Kyiv	[REDACTED]	1836
6/26/2013	C	DMP	<b>From:</b> Konstantin Kilimnik <b>To:</b> [REDACTED]	-	Memo from PM to SL is sent Kilimnik re: Durbin resolution	Senate; House; State Department	624

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
6/26/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates requests Mercury assessment on [REDACTED] position on the Durbin resolution.	[REDACTED]	1514
7/10/2013	P	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Last Saved	PM memo to SL details strategy is to deploy the Hapsburg team to make calls to specific members of US Congress. Advises team's reluctance to move forward until the contractual issues are resolved.	Congress	708
7/11/2013	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Gates wants to identify contacts to lobby Senator re: Durbin resolution.	[REDACTED]	1838
7/11/2013	P	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	Contacts identified with gas interests to lobby Senator re: Durbin resolution	[REDACTED]	1839
7/25/2013	P	[REDACTED]; DMP	(Email chain) <b>Participants:</b> [REDACTED] [REDACTED]; Rick Gates	-	Email proposing discussions with Senator re: Durbin resolution	[REDACTED]	1840

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
8/5/2013	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates <b>Cc:</b> [REDACTED] [REDACTED] <b>Additional email copy sent to</b> [REDACTED]	-	Main accomplishments over past seven months re: Engage Ukraine strategy	[REDACTED]	1841
8/8/2013	P	[REDACTED] ECFMU;	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] (ECFMU) <b>Cc:</b> [REDACTED] [REDACTED]	-	Phone call summary re: [REDACTED] travel plans and coordination with Congressional sessions	Congress	1842
8/8/2013	P	[REDACTED] ECFMU;	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] (ECFMU) <b>Cc:</b> [REDACTED] [REDACTED]	-	Phone call summary re: [REDACTED] travel plans and coordination with Congressional sessions	Congress	1843
9/3/2013	P; C	[REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] [REDACTED]	-	Gates emails out taskings and notes Durbin resolution. [REDACTED] confirms past work that has been done, without payment.	House; Senate	1847

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
9/4/2013	P	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED]	-	[REDACTED] sends draft resolution language re: Tymoshenko	House; Senate	1849
9/25/2013	P	[REDACTED]	[REDACTED] (hain) <b>Participants:</b> [REDACTED]	-	[REDACTED] replies to 9/24 e-mail advising RG requested effort to identify contacts to oppose the legislation calling for Tymoshenko's release in districts with strong Ukr-American presence; [REDACTED] questions feasibility and requests clarification on the identification of districts and fundraisers	House; Senate	1852
9/30/2013	P	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] [REDACTED] <b>Cc:</b> [REDACTED]	-	[REDACTED] receives an update from [REDACTED]. [REDACTED] advises not to pass along to "client".	[REDACTED]	1853



## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
10/8/2013	C	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	Email chain with internal discussion about lack of payment, as well as an update from a contact at the House.	[REDACTED]	1856
10/9/2013	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Question from House staffer re: funder for ECFMU	[REDACTED]	1857
10/17/2013	P	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates requests call to [REDACTED] advising call with [REDACTED] who "is in the loop".	[REDACTED]	1860

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
11/19/2013	P	[REDACTED] ECFMU	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> [REDACTED] (ECFMU); Rick Gates <b>Cc:</b> [REDACTED] [REDACTED] [REDACTED]	-	Outline for [REDACTED] visit	[REDACTED]	1868
11/19/2013	C	[REDACTED]	<b>From:</b> [REDACTED] [REDACTED] <b>To:</b> Rick Gates <b>Cc:</b> [REDACTED] [REDACTED]	-	[REDACTED] forwards Senator statements to Gates	[REDACTED]	1937
11/20/2013	C	[REDACTED]	(E-mail chain) <b>Participants:</b> [REDACTED] [REDACTED] [REDACTED]	-	Outreach to House re: resolution language to speak directly with the Chairman	[REDACTED]	1531
11/23/2013	P	DMP; [REDACTED]	(E-mail chain) <b>Participants:</b> Rick Gates; [REDACTED] [REDACTED] [REDACTED]	-	Email regarding readout of [REDACTED] and President Yanukovich and request for outreach from Gates	International Monetary Fund	1870

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
11/26/2013	P; C	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	Email re: call with [REDACTED] upcoming trip, and proposed meetings	[REDACTED]	1534
1/17/2014	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Outreach by [REDACTED] to House regarding [REDACTED] per Gates	[REDACTED]	1544
1/24/2014	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Email confirming [REDACTED] is an advisor to PM and suggest phone call and meetings with House Representative	[REDACTED]	1538
1/28/2014	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED] <b>Attendees:</b> [REDACTED]	-	Calendar invite for phone call between [REDACTED] [REDACTED]	[REDACTED]	1539
1/28/2014	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	-	Confirmation of Congressional outreach re: HR 447	[REDACTED]	1881

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
2/3/2014	P	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates looking to arrange meetings for [REDACTED] [REDACTED]	[REDACTED]	1542
2/6/2014	P	[REDACTED] ECFMU; DMP	(Email chain) <b>Participants:</b> Rick Gates, [REDACTED] [REDACTED] (ECFMU); [REDACTED] [REDACTED]	-	Email conversation about article re: [REDACTED] call; discussion of meetings	[REDACTED]	1885
2/11/2014	P	[REDACTED]; DMP	(Email chain) Participants: Rick Gates; [REDACTED] [REDACTED]	-	Email discussion about guest list for dinner with Sergei Lyvochin	[REDACTED]	1886

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
2/11/2014	P	[REDACTED]; DMP	(Email chain) <b>Participants:</b> [REDACTED]	-	Email between [REDACTED] discussing attendees for dinner with Sergei Lyvochkin (former CoS to Yanukovich and then current presidential adviser)	[REDACTED]	1887
2/18/2014	P	[REDACTED]; DMP;	(Email chain) <b>Participants:</b> [REDACTED] Rick	-	Gates emails about [REDACTED] draft language and discusses outreach. [REDACTED] responds.	[REDACTED]	1545
2/18/2014	P	[REDACTED]; DMP;	Gates (Email chain) <b>Participants:</b> [REDACTED]	-	Discussion of outreach on the [REDACTED] bill and whether the co-sponsor [REDACTED] had turned because of "Bad ECFMU stories"	[REDACTED]	1546
2/18/2014	P	[REDACTED]; DMP;	Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Gates emails about [REDACTED] draft language and discusses outreach.	[REDACTED]	1888

## Government Relations Activity

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/ Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
4/21/2014	C	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	-	Gates emails about Yulia Tymo's trip to DC and negative blog reports about Congressional meetings	Congress	1907
5/7/2014	P	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]	-	Email of QFRs for the Ukraine HFAC hearing	Discusses State Department's role	1909
6/26/2016	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	-	Itinerary detailing [REDACTED] scheduled meetings on the Hill	[REDACTED] Senate	1656
6/27/2017	C	DMP	<b>es:</b> Paul Manafort; Richard Gates	Signed Registrant	NSD/FARA Registration	[REDACTED]	928
2/28/2018	C	DMP; [REDACTED]	(Chat) <b>Participants:</b> Konstantin Kilimnik; [REDACTED]	-	Discussion about lobbying	-	1346
2/28/2018	C	DMP; [REDACTED]	(Chat) <b>Participants:</b> Konstantin Kilimnik; [REDACTED]	-	Discussion about lobbying	-	1347

## Government Relations Activity

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/ Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
10/18/2018	P	[REDACTED] ECFMU;	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED] (ECFMU); <b>Cc:</b> [REDACTED] [REDACTED] Rick Gates	-	Proposed itemerary prepared by [REDACTED] [REDACTED] for the visit by [REDACTED] - October 29-31, 2013. Both members of the Party of Regions. ECFMU	[REDACTED]	1859

## Government Relations Activity: Paul Manafort

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/Recipient(s) )</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
6/2/2005	C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED] <b>CC:</b> [REDACTED]	From	Memo summarizing Manafort's meeting with the coordinator of US-Ukraine policy at the National Security Council	National Security Council	500
6/25/2012	P	[REDACTED]; DMP	<b>From:</b> PJM <b>To:</b> RG; KK; [REDACTED] <b>CC:</b> [REDACTED]	From	Memo from Manafort proposing a strategy to go on offense against criticism of the Ukrainian government. Gates will direct the collaborative government relations outreach plan.	"western governments" (entities not specified)	503
7/10/2012	P	DMP	<b>From:</b> Paul Manafort <b>To:</b> Rick Gates	From	Memo outlining key talking points by Ukrainian politician, [REDACTED], during Ohkendovsky's upcoming visit to the US	House; Senate (Both per [REDACTED] itinerary)	506
8/5/2012	P	ECFMU; DMP	<b>From:</b> PJM <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	From	Email containining government relations plan	European government entities	508
10/9/2012	P	DMP	-	Author	PM memo titled "Observer Group Strategy Team" regarding dealing with election observers. PM has PJM [REDACTED] in charge of overall strategy with [REDACTED] over Europe and [REDACTED]	US delegations to Ukraine	517



## Government Relations Activity: Paul Manafort

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/Recipient(s) )	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
6/18/2005	P	-	-	Author/Last Saved	Memo titled <i>Basel Presentation</i> , detailing a programmatic strategy based upon a direct mandate provided by [REDACTED]. The three programs identified are political efforts, government lobbying, and legal efforts.	US and European Governments (USG Entities: State Department; White House; National Security Council; Commerce Department; AID; World Bank)	520
6/23/2005	P	[REDACTED]; DMP	<b>From:</b> Paul J. Manafort, Richard Davis <b>To:</b> [REDACTED] Author/Last Saved: [REDACTED]	From	Memo, with the subject line "Political, Lobbying and Legal Program for CIS", provides an update on the project's success within Ukraine and outlines a strategy for CIS countries	White House; Capitol Hill; US State Department	521
6/25/2005	P	-	-	Author/Last Saved	Memo to [REDACTED]	White House; National Security Council; Office of the VP; State Department; Energy Department; Commerce Department; Interior Department; Congress [REDACTED] [REDACTED]	522
8/10/2005	P	-	<b>From:</b> DM <b>To:</b> [REDACTED] <b>Author:</b> [REDACTED] [REDACTED]	Last Saved	Memo	National Security Council; State Department; Treasury Department; Commerce Department; [REDACTED] [REDACTED]	523

## Government Relations Activity: Paul Manafort

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/Recipient(s) )</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
2/16/2010	P; C	DMP	<b>From:</b> PJM <b>To:</b> VFY	Author/Last Saved	Email identifying recipients who received a financial bonus from Manafort, for VFY's consideration for an additional bonus from VFY. One recipient listed is "Main US Lobbyist".	Main US Lobbyist	531
2/20/2010	P; C	DMP	<b>From:</b> Paul J. Manafort <b>To:</b> President Victor Yanukovich	Author	Memo defines a plan to manage the strategy, public relations and international affairs for President Yanukovich. Manafort references previously managing a Government Relations program for VFY, that Manafort personally created and paid for.	Diplomatic and Political Communities within the US	532
4/9/2010	P	DMP	<b>From:</b> PJM <b>To:</b> VFY	From	Memo to VFY regarding VFY's upcoming trip to the US, which includes talking points for a meeting with [REDACTED]	US Presidential Administration; US Treasury; World Bank	536
6/18/2010	P; C	DMP	<b>From:</b> Paul J. Manafort <b>To:</b> President Victor Yanukovich	From; Author/Last Saved	Memo to VFY offering thanks for a financial bonus VFY sent, providing updates on Manafort's meetings with USG entities re: IMF deal, and talking points for a future meeting between VFY and [REDACTED]	US Department of Treasury, National Security Council	539

## Government Relations Activity: Paul Manafort

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3/2/2011	P	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From	Email providing talking points for a scheduled call between VFY and [REDACTED]	White House Administration	543
10/16/2011	C	-	<b>From:</b> K. Kilimnik <b>To:</b> [REDACTED], two (2) other recipients	Author/Last Saved	Memo from to VFY with a readout of meetings and phone calls Manafort has had regarding Tymoshenko.	"Washington" - entities are not further specified	551
3/13/2012	C	DMP	<b>From:</b> Konstanin Kilimnik <b>To:</b> Paul Manafort Last Saved: Konstantin Kilimnik	Author	Memo to VFY about contact with the European and US government regarding Tymosheno	National Security Council	563
4/10/2012	P	DMP	<b>From:</b> Konstantin Kilimnik <b>To:</b> Paul Manafort	To	Kilimnik has a called scheduled with [REDACTED] and SL has requested weekly updates regarding lobbying, PR, and GR activities.	-	567
4/11/2012	P	DMP	<b>From:</b> Paul Manafort <b>To:</b> K. Kilimnik; Rick Gates	From	Email chain discussing providing an update to BG re: [REDACTED] and Skadden. PM provides guidance to include [REDACTED] activities.	-	568

## Government Relations Activity: Paul Manafort

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4/11/2012	P	[REDACTED]; DMP	<b>(Email) From:</b> Konstantin Kilimnik <b>(Email) To:</b> Two (2) other Russian recipients <b>(Memo) From:</b> PJM <b>(Memo) To:</b> VFY Author/Last saved: Rick Gates	From	Update on the public affairs and government relations strategy. There is a proposal for a US Congressional delegation to Ukraine.	US Congressional members	569
9/15/2012	P	DMP	<b>From:</b> Paul Manafort <b>To:</b> Rick Gates <b>Cc:</b> Konstantin Kilimnik	From; Author/Last Saved	Memo from Manafort advising aggressive short term strategy plan titled <i>Pre-Election Lobby Plan</i>	[REDACTED]	589
9/24/2012	C	DMP	<b>From:</b> PJM <b>To:</b> VFY	From; Author/Last Saved	Manafort provides VFY with a strategy update regarding Durbin resolution.	White House; State Department; [REDACTED]	594
10/14/2012	P	DMP	<b>From:</b> Paul Manafort <b>To:</b> [REDACTED] <b>Cc:</b> Konstantin Kilimnik; Rick Gates	From	Manafort emails multiple attachments to [REDACTED] regarding Ukraine elections, advising [REDACTED] draft an additional memo. One attachment contains talking points for [REDACTED] US visit	Senate; House	597

## Government Relations Activity: Paul Manafort

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2/19/2013	C	DMP	<b>From:</b> PJM <b>To:</b> President VFY	From; Author/Last Saved	Memo to VFY regarding "actions taken by [the] US consultants team in support of Ukraine's priorities"	Administration; Congress	605
2/21/2013	P	DMP	<b>From:</b> PJM <b>To:</b> President VFT	From; Author/Last Saved	PM memo to VY re Hapsburg Update to include plan to deploy to U.S. "By expanding the presence of the Hapsburg team to the US this year...leverage the team's experience, expertise, and network of high profile EU and US officials behind the scenes as much as possible."	Administration officials; [REDACTED]	606
2/21/2013	P	DMP	<b>From:</b> Stepanov <b>To:</b> Konstantin Kilimnik	(Memo) From	Manfort memo to VFY re: Engage Ukraine Strategy for 2013	White House; Department of State; Congress	607
3/21/2013	P	DMP	-	Author/Last Saved	Gates Agenda for 3/21/13; Discusses GR and PR in US	[REDACTED]; [REDACTED]	613
4/22/2013	C	DMP	<b>From:</b> PJM <b>To:</b> President VFY	From; Last Saved	Manfort memo re: Quarterly Report on US Consultants activity	White House; Senate; House; State Department	616
4/25/2013	C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Author/Last Saved	Manfort sends an updated ledger of summary of accounts overdue and writes "I have paid out all of Hapsburg and all but one month of the US operations out of my pocket."	US Lobbying	617

## Government Relations Activity: Paul Manafort

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2/24/2013	P; C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Author/Last Saved	Email update on Kwasniewski and RP's visit/meeting agenda	Congress; Administration officials; [REDACTED]	691
2/26/2013	C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Author/Last Saved	Positive update on Portnov's US visit	[REDACTED]	692
3/2/2013	P; C	DMP	-	Author/Last Saved	Memo from Manafort with updates from previous visits and future meetings/taskings	[REDACTED]	693
3/16/2013	C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From	Memo on Prodi's visit discusses bi- lateral meetings	[REDACTED]	694
3/23/2013	P	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	Last Saved	Memo on US Consultants weekly activities	[REDACTED]	695
4/7/2013	P	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Author/Last Saved	Memo from Manafort re: Hapsburg update - April/May plan. "This phase centers around a high-level and intense private effort at back-channel diplomacy focused on senior U.S. and European officials."	-	696
4/21/2013	C	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Last Saved	US Consultants Activity - Weekly Update	White House; Senate; House; State Department	697

## Government Relations Activity: Paul Manafort

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4/25/2013	P	DMP	-	Author/Last Saved	Outline from Manafort detailing GR outreach	Congressman w/ shale gas field interests	699
5/7/2013	P	-	-	Last Saved	Agenda for [REDACTED] DC visit	[REDACTED]	700
6/9/2013	C	-	<b>From:</b> PJM <b>To:</b> SL	Last Saved	Summary report from Manafort on [REDACTED] trip	[REDACTED]	706
6/17/2013	C	DMP	<b>From:</b> PJM <b>To:</b> SL	Last Saved	PM memo to SL stating "I have been financing operations by a personal loan...I have new obligations to Hapsburg and the US Consultants...The work is at a peak level of impact in the US... and with selected media."	-	707
7/10/2013	P	DMP	<b>From:</b> PJM <b>To:</b> [REDACTED]	From; Last Saved	PM memo to SL details strategy is to deploy the Hapsburg team to make calls to specific members of US Congress. Advises team's reluctance to move forward until the contractual issues are resolved.	Congress	708

## Government Relations Activity: Paul Manafort

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10/9/2012	P	DMP	From: Paul Manafort To: Richard Gates	From	PM asks RG "I want to see a report from the US and Europe on what each PR firm is specifically doing on the pre-election GR plans/including work product...The report should highlight who is being briefed, importance of person, expectations, leave behinds. The more detail the better..."		834
10/26/2012	P	DMP	From: Paul Manafort To: [REDACTED]	From	PM tells [REDACTED] "The new goal is to leverage this all into a [REDACTED] call to VY on Monday congratulating him on having a good election. State will oppose this but State is on one side now with [REDACTED] endorsement of the anti Jewish coalition." PM outlines aspects of strategy and tells [REDACTED] to coordinate with Rick Gates.	US Presidential Administration	840
10/28/2012	C	DMP	From: [REDACTED] To: Paul Manafort	To	PM suggests talking points for [REDACTED] to the [REDACTED] campaign in order to encourage him to call President Yanukovich over Ukraine elections. [REDACTED] confirms he reached out. "I just sent something to Chicago that will be going to [REDACTED]..."	US Presidential Administration	841



## Government Relations Activity: Paul Manafort

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5/17/2013	C	██████████	<b>From:</b> ██████████ <b>To:</b> Paul Manafort	To	██████████ provides PM a readout of Hapsburg Group member ██████████ meetings with members of US Presidential Administration including ██████████, and discussions with them regarding Ukraine.	US Presidential Administration	852
5/17/2013	C	██████████	<b>From:</b> ██████████ <b>To:</b> Paul Manafort	To	██████████ provides PM readout of Hapsburg Group member ██████████ meetings with members of Congress, and discussions regarding Ukraine.	Members of Congress	853
9/6/2013	P	██████████	<b>From:</b> Paul Manafort <b>To:</b> ██████████	From	PM tasks ██████████ and Gates to brief key members of Congress regarding Tymoshenko's appeal in Ukraine. "Rick you should use the ██████████ channel to make certain that things are understood properly."	US Congressional members	860
12/29/2013	P	DMP	<b>From:</b> Paul Manafort <b>To:</b> ██████████ ██████████; Rick Gates	From	PM e-mails article re Euromaidan protestors and tells ██████████ "This ought to be pushed hard, especially with ██████████"	US Congressional members; US State Department	869
6/27/2017	C	DMP	<b>Signatures:</b> Paul Manafort; Richard Gates	Signed Registrant	NSD/FARA Registration	-	928

## Government Relations Activity: Paul Manafort

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/Recipient(s)</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
9/9/2011	P	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> Paul Manafort <b>Cc:</b> [REDACTED]	To	Arranging a meeting for a Ukrainian delegation with senior-level Hill staffers and foreign policy scholars and editors	[REDACTED]	1072
9/19/2012	P	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED] [REDACTED] Konstantin Kilimnik	Referenced	Email from [REDACTED] discussing outreach to re: Senate resolution on Tymoshenko's release and writes "Paul works through his channels and is sending the same messages."	unidentified "channels"	1172
3/13/2013	C	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> [REDACTED]	Referenced	Manafort received two calls from the Hill re: [REDACTED] visit.	Congress	1275
9/19/2012	C	[REDACTED]; DMP	(Email chain) <b>Participants:</b> Paul Manafort; Rick Gates; [REDACTED] [REDACTED]; Konstantin Kilimnik; [REDACTED]	Cc	Manafort directed urgent contact recommendations to Gates regarding Senate resolution on Tymoshenko	[REDACTED]	1308

## Government Relations Activity: Paul Manafort

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2/23/2013	P	DMP	(Email chain) <b>Participants:</b> [REDACTED] [REDACTED]; Rick Gates; Paul Manafort	Cc	Email coordinating meetings for [REDACTED]	White House; Congress	1316
2/27/2013	P	DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]; Paul Manafort	Cc	Gates provides priority meetings for [REDACTED] visit	House; Senate; Senate Foreign Relations Committee	1320
2/27/2013	P	DMP	<b>From:</b> Friedman <b>To:</b> Paul Manafort; [REDACTED] [REDACTED] Konstantin Kilimnik	To	[REDACTED] emails updates from [REDACTED] a; mentions [REDACTED] DC trip	political meetings	1321
2/28/2013	C	DMP	<b>From:</b> Rick Gates <b>To:</b> Paul Manafort <b>Cc:</b> [REDACTED]	To	Gates provided talking point to [REDACTED] re: meetings	-	1322
3/1/2013	C	DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] [REDACTED] <b>Cc:</b> Paul Manafort	Cc	Gates sends final meeting agenda for [REDACTED]	-	1324
3/3/2013	C	DMP	<b>From:</b> Rick Gates <b>To:</b> Paul Manafort; [REDACTED] [REDACTED]	To	Gates provides positive updates on [REDACTED] visit	All scheduled meetings attended	1326

## Government Relations Activity: Paul Manafort

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/Recipient(s) )	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
3/5/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> Paul Manafort; [REDACTED] [REDACTED]	To	[REDACTED] anticipated meeting schedule	[REDACTED]	1327
3/15/2013	C	DMP	<b>From:</b> [REDACTED] <b>To:</b> Paul Manafort <b>Cc:</b> Rick Gates; Konstantin Kilimnik	To	Sager sends memo summarizing [REDACTED] trip to DC	-	1343
9/23/2012	P	[REDACTED] DMP	<b>From:</b> [REDACTED] <b>To:</b> Paul Manafort; Rick Gates; [REDACTED] [REDACTED]	To	[REDACTED] circulates documents and an agenda for H-Club meeting. The agenda includes topic of "International Activity", where "GC" and "USA" are listed.	USA (entity not specified)	1374
12/6/2012	P	[REDACTED]; DMP; [REDACTED]; DMP	(Email chain) <b>Participants:</b> [REDACTED] [REDACTED] Gates; Kilimnik; Manafort	Cc	Documents, including strategy plans, for SA report that have been edited by Manafort	-	1400

## Government Relations Activity: Paul Manafort

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/Recipient(s) )	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
12/14/2012	P	[REDACTED]; DMP	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates	Referenced	Email titled "Government Relations Strategy - ECFMU)	[REDACTED] <i>Other primary targets are identified</i>	1448
1/16/2013	C	[REDACTED]; DMP	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	(Memo) From	Gates forwards a memo from Manafort to Yakunovich re: US Congressional Resolutions H. Res. 27 and H. Res. 28, describing [REDACTED] work	[REDACTED]	1453
3/14/2013	P	[REDACTED]	<b>From:</b> [REDACTED] <b>To:</b> Rick Gates; Paul Manafort <b>Cc:</b> [REDACTED]	To	Calendar update for meeting changes between Manafort and Congress	[REDACTED]	1482
3/18/2013	C	DMP	<b>From:</b> [REDACTED] <b>To:</b> Paul Manafort	To	Memo to PM re: upcoming briefings, Q&A about ECFMU and a question about FARA.	[REDACTED]	1484

## Government Relations Activity: Paul Manafort

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/Recipient(s) )</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
3/18/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]	Referenced	Additional proposed DC meetings for Manafort	[REDACTED]	1485
3/19/2013	P	DMP; [REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED]	Referenced	Read message confirmation for subject "Dinner/Manafort, [REDACTED]"	[REDACTED]	1488
6/4/2013	P	[REDACTED]	<b>Calendar Organizer:</b> [REDACTED] <b>Attendees:</b> [REDACTED]		Meeting scheduled	[REDACTED]	1505
8/27/2012	P	DMP; [REDACTED]	(Email chain) <b>Participants:</b> Paul Manafort; Rick Gates; [REDACTED]	From	Email chain originating from Manafort to Gates regarding recommendation for VY to call [REDACTED] after the DNC. Manafort requests Gates vet recommendation with [REDACTED]	[REDACTED]	1679

## Government Relations Activity: Paul Manafort

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Sender(s)/Recipient(s) ( )</b>	<b>Manafort's Participation</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
10/30/2012	P	[REDACTED]; DMP	(Email chain) <b>Participants:</b> Paul Manafort; [REDACTED] Rick Gates; [REDACTED]	From	Gates forwards an email from Manafort to [REDACTED] requesting a separate strategy for outreach.	White House; Natonal Security Council	1751
4/6/2013	P	[REDACTED]	(Email chain) <b>Participants:</b> [REDACTED]		Proposed GR strategy plan by [REDACTED]	[REDACTED] State Department; White House National Security Council	1805

## Government Relations Activity: Paul Manafort

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Sender(s)/Recipient(s)	Manafort's Participation	Political Activity	Lobbied Entity	Exhibit
3/6/2012	P	[REDACTED]	<b>From:</b> Rick Gates <b>To:</b> [REDACTED] <b>Cc:</b> [REDACTED]		Arranging meetings with the National Security Council for Prime Minister (PM) [REDACTED] upcoming visit and identifying other persons of interest for the PM to meet.	[REDACTED]	1935



# **EXHIBIT 442**

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
5/31/2007	Completed			Article RE: Yanukovych	Wall Street Journal	1018	Placed Article
5/15/2011	Proposed			Interview RE: Ukraine	CNBC	1029	
7/20/2011	Proposed			Set up blogs	Unspecified	1046	Recipient
7/21/2011	Proposed			Blog RE: Ukraine	CXSSR	547	
7/22/2011	Attempted			Online Commentary RE: Ukraine	Topix	1049	
7/22/2011	Proposed			Online Commentary RE: Ukraine	National Review	1049	
7/22/2011	Proposed			Online Commentary RE: Ukraine	Red State	1049	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Manafort Involvement</b>			
		<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	
8/15/2011	Proposed	Op-Ed RE: rule of law / judicial reform in Ukraine	New York Times	1062	
8/24/2011	Attempted	Op-Ed RE: Ukraine	Wall Street Journal	1065	
8/24/2011	Completed	Op-Ed of Yanukovych	Wall Street Journal	1068	Recipient
9/6/2011	Proposed	Op-Ed RE: Tymoschenko	Wall Street Journal	1070	Author
9/11/2011	Attempted	Interview of [REDACTED]	Wall Street Journal	1066	Author
9/11/2011	Proposed	Interview of [REDACTED]	Wall Street Journal	1067	CC'd; Referenced

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
9/18/2011	Proposed			Outreach RE: Ukraine	Time Magazine	1073	Recipient
9/18/2011	Proposed			Outreach RE: EU relations and energy	Wall Street Journal	1073	Recipient
9/18/2011	Proposed			Op-Ed RE: Tymoschenko	Unspecified	1073	Recipient
9/20/2011	Proposed			Outreach RE: Ukraine	Wall Street Journal	1074	Approver
9/21/2011	Attempted			Article RE: Ukraine	Wall Street Journal	549	
10/12/2011	Attempted			Interview of [REDACTED]	Wall Street Journal	1075	Recipient
10/19/2011	Proposed			Interview of [REDACTED]	Washington Times	1076	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
10/19/2011	Proposed			Interview of [REDACTED]	Foreign Policy	1076	
10/19/2011	Proposed			Interview of [REDACTED]	Bloomberg BNA	1076	
10/22/2011	Completed			Outreach RE: Tymoschenko	Wall Street Journal	1077	Recipient
12/17/2011	Proposed			Interview of [REDACTED]	Bloomberg Television	1081	Recipient (intended)
12/23/2011	Completed			Article RE: Ukraine	Red State	1082	Recipient
1/5/2012	Proposed			Interview of [REDACTED]	Wall Street Journal	1083	
1/14/2012	Proposed			Blog RE: Ukraine	CXSSR	1084	Recipient

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
2/3/2012	Proposed			Interview RE: Ukraine	Wall Street Journal	1088	Recipient
3/12/2012	Proposed			Interview of [REDACTED]	Bloomberg	610	
3/13/2012	Attempted			Article RE: Ukraine	Daily Caller	1091	
3/13/2012	Proposed			Article RE: Ukraine	Red State	1091	
3/13/2012	Attempted			Article RE: Ukraine	Red State	1091	
4/8/2012	Proposed			Public Affairs Campaign in the US and Europe	US media	569	Author
4/11/2012	Proposed			PR for [REDACTED] in Europe and US	US media	570	Author
5/10/2012	Attempted			Outreach RE: Ukraine	New York Times	1616	

## Public Relations Activity

Date	Proposed, Attempted, or Completed	Company	Lobbyist	Political Activity	Media Entity	Exhibit	Manafort Involvement
5/10/2012	Attempted			Outreach RE: Ukraine	Washington Post	1616	
5/10/2012	Attempted			Outreach RE: Ukraine	Foreign Policy	1616	
5/10/2012	Attempted			Outreach RE: Ukraine	NPR	1616	
5/10/2012	Attempted			Outreach RE: Ukraine	Bloomberg	1616	
5/10/2012	Attempted			Outreach RE: Ukraine	Reuters	1616	
5/10/2012	Attempted			Outreach RE: Ukraine	Christian Science Monitor	1616	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
5/10/2012	Attempted			Outreach RE: Ukraine	Associated Press	1616	
5/17/2012	Proposed			Outreach RE: [REDACTED]	Washington Times	1099	
5/19/2012	Attempted			Interview RE: Ukraine	Washington Times	578	
5/28/2012	Completed			Interview of [REDACTED]	Bloomberg	581	
5/28/2012	Completed			Article RE: Ukraine	Washington Times	581	



**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
5/29/2012	Attempted			Outreach RE: [REDACTED]	Washington Times	1100	
5/29/2012	Attempted			Interview of [REDACTED]	Bloomberg Television	1100	
6/6/2012	Completed			Outreach RE: Skadden Report	CQ Roll Call	1645	
6/20/2012	Completed			Blog RE: Ukraine	CXSSR	1103	
6/26/2012	Proposed			Outreach RE: [REDACTED] Visit	NPR	1656	
6/26/2012	Proposed			Outreach RE: [REDACTED] Visit	National Journal	1656	
6/26/2012	Proposed			Outreach RE: [REDACTED] Visit	Washington Post	1656	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
6/26/2012	Proposed			Outreach RE: [REDACTED] Visit	Wall Street Journal	1656	
6/26/2012	Proposed			Outreach RE: [REDACTED] Visit	Atlantic	1656	
6/26/2012	Proposed			Outreach RE: [REDACTED] Visit	Foreign Policy	1656	
6/26/2012	Proposed			Outreach RE: [REDACTED] Visit	New Republic	1656	
7/11/2012	Proposed			Op-Ed from [REDACTED]	Wall Street Journal	1107	
7/11/2012	Proposed			Op-Ed from [REDACTED]	Washington Times	1107	
7/12/2012	Proposed			Op-Ed from [REDACTED]	"US political and biz establishment"	1110	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
7/17/2012	Proposed			Interview of [REDACTED]	Bloomberg	1111	
7/18/2012	Proposed			Outreach RE: Skadden Report	Foreign Policy	2062	
7/18/2012	Proposed			Outreach RE: Skadden Report	New York Times	2062	
7/20/2012	Proposed			Op-Ed from [REDACTED]	(seeking placement)	1114	
7/29/2012	Proposed			Op-Ed from [REDACTED]	Wall Street Journal	1123	
7/30/2012	Proposed			Op-Ed from [REDACTED]	Wall Street Journal	1124	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
7/30/2012	Proposed			Op-Ed from [REDACTED]	Washington Post or CQ Roll Call	1125	
7/30/2012	Proposed			Interview of [REDACTED]	Bloomberg Television	1126	
7/30/2012	Completed			Op-Ed from [REDACTED]	CQ Roll Call	1128	
7/30/2012	Completed			Op-Ed from [REDACTED]	CQ Roll Call	1130	
7/30/2012	Proposed			Interview of [REDACTED]	Bloomberg Television	1130	
7/30/2012	Proposed			Interview of [REDACTED]	Reuters	1130	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
7/31/2012	Completed			Op-Ed from [REDACTED]	CQ Roll Call	1131	
7/31/2012	Proposed			Interview of [REDACTED]	Bloomberg Television	1131	
7/31/2012	Proposed			Interview of [REDACTED]	Reuters	1131	
7/31/2012	Attempted			Interview of [REDACTED]	Bloomberg Television	1132	CC'd
7/31/2012	Completed			Interview of [REDACTED]	Reuters	1132	CC'd
7/31/2012	Completed			Op-Ed from [REDACTED]	CQ Roll Call	1134	
7/31/2012	Proposed			Interview of [REDACTED]	Bloomberg Television	1136	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
7/31/2012	Proposed			Interview of [REDACTED]	Reuters	1136	
8/3/2012	Proposed			Interview of [REDACTED]	Bloomberg	1141	
8/7/2012	Completed			Interview with [REDACTED]	New York Times	1674	
8/7/2012	Completed			Interview with [REDACTED]	Wall Street Journal	1674	
8/7/2012	Completed			Interview with [REDACTED]	Foreign Policy	1674	
8/7/2012	Completed			Interview with [REDACTED]	Time Magazine	1674	
8/7/2012	Completed			Op-Ed of [REDACTED]	Washington Post	1674	
8/7/2012	Completed			Interview with [REDACTED]	Bloomberg	1674	

## Public Relations Activity

Date	Proposed, Attempted, or Completed	Company	Lobbyist	Political Activity	Media Entity	Exhibit	Manafort Involvement
8/7/2012	Completed			Interview with [REDACTED]	Reuters	1674	
8/7/2012	Completed			Op-Ed for [REDACTED]	CQ Roll Call	1674	
8/30/2012	Proposed			Interview with [REDACTED]	Wall Street Journal	1682	
8/30/2012	Proposed			Interview with [REDACTED]	New York Times	1682	
8/30/2012	Proposed			Interview with [REDACTED]	Washington Post	1682	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
9/11/2012	Proposed			Interview with [REDACTED]	Bloomberg	1685	
9/22/2012	Attempted			Interview of [REDACTED]	Wall Street Journal	590	CC
9/26/2012	Proposed			Outreach RE: Skadden Report	Washington Post	1390	
9/26/2012	Proposed			Outreach RE: Skadden Report	The Weekly Standard	1390	
9/26/2012	Proposed			Outreach RE: Skadden Report	National Review	1390	
9/29/2012	Completed			Article RE: engagement with [REDACTED]	CXSSR	1181	
10/2/2012	Proposed			US Media Outreach RE: Skadden Report	Bloomberg	515	Author



**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
10/2/2012	Completed			Outreach RE: Skadden Report	New York Times	2102	
10/15/2012	Attempted			Article RE: Ukraine	Associated Press	519	Author
10/15/2012	Completed			Op-Ed from Hapsburg figure	Wall Street Journal	835	Editor
10/18/2012	Attempted			Op-Ed by [REDACTED]	Wall Street Journal	1206	
10/24/2012	Proposed			Op-Ed from Hapsburg figure	New York Times	837	Proposes Article
10/24/2012	Attempted			Article RE: Ukraine and Clinton	New York Post; Blogs	838	Placed Article
10/24/2012	Completed			Outreach RE: Ukraine	Diplomatic Courier	1433	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
10/24/2012	Completed			Outreach RE: Ukraine	Christian Science Monitor	1433	
10/24/2012	Completed			Outreach RE: Ukraine	National Journal	1433	
10/24/2012	Completed			Outreach RE: Ukraine	Forbes	1433	
10/25/2012	Proposed			Outreach RE: Ukraine	Washington Times	839	Recipient
10/27/2012	Proposed			Meeting RE: Ukraine	Washington Times	598	
11/20/2012	Proposed			Outreach RE: [REDACTED] visit	Wall Street Journal	1439	
11/20/2012	Proposed			Outreach RE: [REDACTED] visit	Foreign Policy	1439	

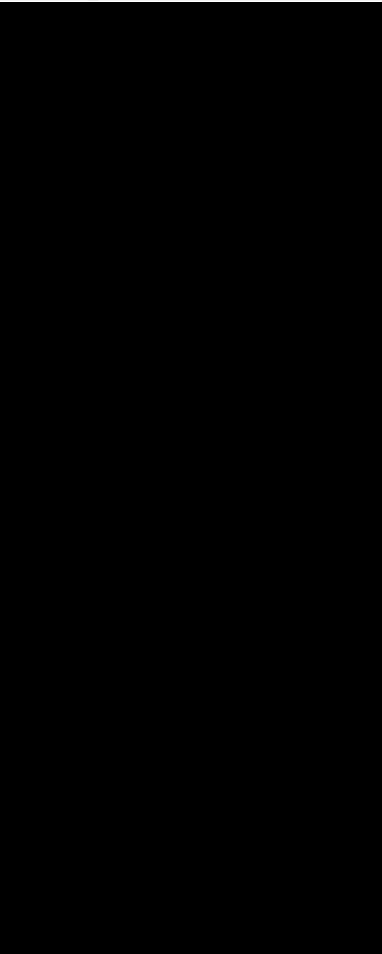
**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
11/20/2012	Proposed			Outreach RE: [REDACTED] visit	Bloomberg	1439	
11/26/2012	Attempted			Op-Ed for [REDACTED]	The Hill	1759	
12/6/2012	Proposed			Outreach RE: Skadden Report	New York Times	1402	
12/7/2012	Attempted			Article RE: Ukraine	Wall Street Journal	1245	
12/8/2012	Proposed			Conference RE: Ukraine	Red State	1246	
12/10/2012	Attempted			Outreach RE: Skadden Report	New York Times	1403	
12/11/2012	Attempted			Outreach RE: Skadden Report	New York Times	1404	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>						<b>Manafort Involvement</b>
		<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	
12/11/2012	Completed			Outreach RE: Skadden Report	New York Times	2108	
12/11/2012	Completed			Outreach RE: Skadden Report	New York Times	2109	
12/11/2012	Completed			Outreach RE: Skadden Report	New York Times	2110	
12/11/2012	Completed			Outreach RE: Skadden Report	New York Times	2111	
12/11/2012	Completed			Outreach RE: Skadden Report	New York Times	2112	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
12/12/2012	Completed			Outreach RE: Skadden Report	New York Times	2116	
12/12/2012	Completed			Outreach RE: Skadden Report	New York Times	2117	
12/12/2012	Completed			Outreach RE: Skadden Report	New York Times	2118	
12/13/2012	Proposed			Outreach RE: Skadden Report	New York Times	1398	
12/14/2012	Proposed			Outreach RE: Skadden Report	Bloomberg	1772	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
12/14/2012	Proposed			Op-Ed RE: Skadden Report	Wall Street Journal	1772	
12/14/2012	Proposed			Op-Ed RE: Ukraine	New York Times or Foreign Policy	1772	
2/20/2013	Proposed			Article RE: Ukraine	CXSSR	1312	
2/21/2013	Completed			Article RE: Ukraine	CXSSR	1314	Recipient
2/22/2013	Proposed			Interview of [REDACTED]	Fox or CNN	1315	
2/24/2013	Proposed			Op-Ed from [REDACTED]	Unspecified	691	Author

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
3/1/2013	Proposed			Op-Ed for [REDACTED]	The Hill	1323	Provides feedback
3/1/2013	Proposed			Op-Ed for [REDACTED]	The Hill	1324	CC'd

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
3/5/2013	Proposed			Interview of [REDACTED]	CXSSR	1329	
3/10/2013	Proposed			Op-Ed for [REDACTED]		1334	Recipient
3/12/2013	Attempted			Op-Ed RE: Ukraine	Wall Street Journal	1274	
3/12/2013	Attempted			Interview of [REDACTED]	Bloomberg	1478	
3/14/2013	Proposed			Interview of [REDACTED]	Bloomberg	1333	Recipient
3/14/2013	Attempted			Interview of [REDACTED]	Time Magazine	1339	Recipient; "Thanks for update"
3/16/2013	Completed			Interview of [REDACTED]	Bloomberg Television	694	Author
3/16/2013	Completed			Interview of [REDACTED]	Bloomberg Print	694	Author



**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
3/16/2013	Completed			Interview of [REDACTED]	Time Magazine	694	Author
3/19/2013	Completed			Article RE: [REDACTED]	Bloomberg	1344	
3/20/2013	Proposed			Op-Ed for [REDACTED]	Politico, Roll Call, The Hill or National Journal	1798	

### Public Relations Activity

Date	Proposed, Attempted, or Completed	Company	Lobbyist	Political Activity	Media Entity	Exhibit	Manafort Involvement
3/20/2013	Proposed	[REDACTED]		Interview with [REDACTED]	Wall Street Journal	1798	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
3/20/2013	Proposed			Interview with [REDACTED]	Christian Science Monitor	1798	
3/20/2013	Proposed			Outreach RE: [REDACTED] visit	Daily Caller, Red State	1798	
3/20/2013	Completed			Interview with [REDACTED]	The Hill	1798	
3/20/2013	Completed			Interview with [REDACTED]	Foreign Policy	1798	

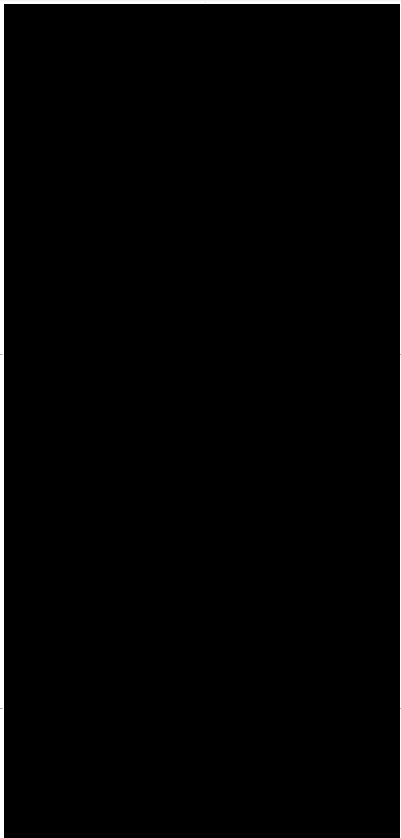

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
3/20/2013	Completed			Interview with [REDACTED]	Time Magazine	1798	
3/20/2013	Completed			Op-Ed for [REDACTED]	Christian Science	1798	
3/26/2013	Attempted			Op-Ed by [REDACTED]	Christian Science	1277	
4/5/2013	Proposed			Op-Ed from Ukraine Government	Washington Post	846	Author
4/9/2013	Attempted			Op-Ed for [REDACTED]	Unspecified	1808	
4/19/2013	Proposed			Interview RE: Ukraine	Bloomberg	615	

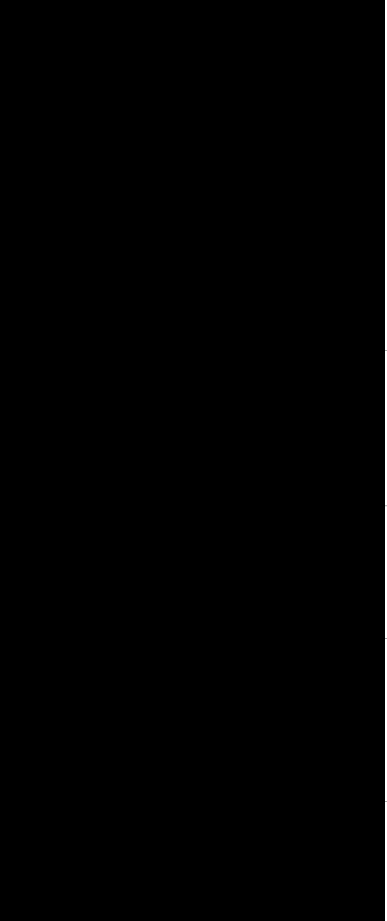
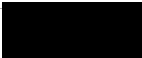
**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
4/19/2013	Proposed	[REDACTED]	[REDACTED]	Interview RE: Ukraine	CNBC	615	
4/19/2013	Proposed			Interview RE: Ukraine	Wall Street Journal	615	
4/19/2013	Completed			Op-Ed for [REDACTED]	The Hill	1810	

## Public Relations Activity

Date	Proposed, Attempted, or Completed	Company	Lobbyist	Political Activity	Media Entity	Exhibit	Manafort Involvement
4/19/2013	Completed			Op-Ed for 	Christian Science Monitor	1810	
4/19/2013	Completed			Outreach RE: Ukraine	Washington Post	1810	
4/19/2013	Completed			Outreach RE: Ukraine	Wall Street Journal	1810	

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
4/19/2013	Completed			Outreach RE: Ukraine	New York Times	1810	
4/19/2013	Proposed			Op-Ed for 	Unspecified	1810	
4/19/2013	Proposed			Outreach RE: Ukraine Energy	Washington Post	1810	
4/19/2013	Proposed			Outreach RE: Ukraine Energy	Wall Street Journal	1810	
4/19/2013	Proposed			Op-Ed by "retired US Navy Admiral"	Unspecified	1810	

**Public Relations Activity**

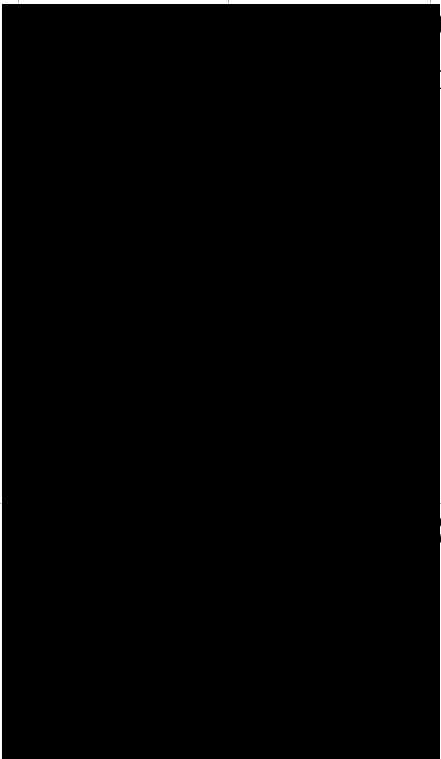
<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
4/22/2013	Completed			Op-Ed from [REDACTED] [REDACTED]	"a significant publication in Washington DC"	616	Author
4/22/2013	Completed			Op-Ed from [REDACTED] [REDACTED]	Christian Science Monitor	616	Author
4/22/2013	Completed			Messaging RE: Ukraine	Washington Post	616	Author
4/22/2013	Completed			Messaging RE: Ukraine	Wall Street Journal	616	Author
4/22/2013	Completed			Messaging RE: Ukraine	New York Times	616	Author



**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
4/22/2013	Completed			Messaging RE: Ukraine	Bloggers	616	Author
4/22/2013	Proposed			Op-Ed from [REDACTED]	Influential newspaper	616	Author
4/22/2013	Proposed			Op-Ed from a retired US Navy Admiral	Unspecified	616	Author
4/25/2013	Proposed			Op-Eds and Interviews RE: Intellectual Property Rights	Unspecified	698	Author

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
4/25/2013	Completed			Op-Eds from Hapsburg figures	Unspecified	712	Author
4/25/2013	Completed			Set up blogs	Unspecified	712	Author

<b>Public Relations Activity</b>							
<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
5/8/2013	Proposed			Meeting RE: Energy	Wall Street Journal	700	(last saved)
5/8/2013	Completed			Meeting RE: Energy	Wall Street Journal	703	
5/9/2013	Completed			Interview of	New York Times	704	
5/10/2013	Attempted			Interview of Ukraine Finance Minister	New York Times	1819	
5/16/2013	Proposed			Article RE: Tymoschenko	US media	851	Proposes Article
6/14/2013	Proposed			Article RE: US Congressman and Ukraine	US media	854	Proposes Article

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
8/16/2013	Proposed			Outreach RE: Ukraine	US media	858	Proposes Article
9/18/2013	Proposed			Outreach RE: Ukraine	CNN; NY Times	862	Proposes Articles
1/29/2014	Attempted			Op-Ed by	New York Times	1281	
1/31/2014	Attempted			Op-Ed by	New York Times	1280	Document incorporates some of PM's
2/4/2014	Attempted			Op-Ed by	New York Times	1284	"Send back to RG and PM"
2/4/2014	Attempted			Op-Ed by	New York Times	1285	"Still waiting for PJM approval"

## Public Relations Activity

Date	Proposed, Attempted, or Completed	Company	Lobbyist	Political Activity	Media Entity	Exhibit	Manafort Involvement
2/5/2014	Attempted			Op-Ed by	New York Times	1287	Additional paragraph was "an attempt to include some
2/7/2014	Attempted			Op-Ed by	New York Times	1288	
2/18/2014	Attempted			Op-Ed by	New York Times	1289	
2/20/2014	Completed			Op-Ed by	New York Times	1291	Recipient
5/19/2018	Attempted			Interview RE: Ukraine	CXSSR	578	
9/22/2018	Attempted			Yanukovich Statement RE: Resolution	Unspecified	591	Author

**Public Relations Activity**

<b>Date</b>	<b>Proposed, Attempted, or Completed</b>	<b>Company</b>	<b>Lobbyist</b>	<b>Political Activity</b>	<b>Media Entity</b>	<b>Exhibit</b>	<b>Manafort Involvement</b>
9/23/2018	Proposed			Interview of [REDACTED]	Wall Street Journal	592	
12/15/2018	Proposed			Interview of [REDACTED]	Bloomberg Television	1080	Recipient
12/15/2018	Proposed			Interview RE: Ukraine	Wall Street Journal	1080	Recipient
12/15/2018	Proposed			Online Commentary RE: Ukraine	Major DC Political Site	1080	Recipient
12/15/2018	Proposed			Set up blog	CXSSR	1080	Recipient
12/15/2018	Completed			Article RE: [REDACTED]	Red State	1080	Recipient

## Public Relations Activity

Date	Proposed, Attempted, or Completed	Company	Lobbyist	Political Activity	Media Entity	Exhibit	Manafort Involvement
7/1/2007 - 8/31/2007	Proposed			Outreach RE: Ukraine	New York Times	1019	
7/1/2007 - 8/31/2007	Proposed			Outreach RE: Ukraine	Wall Street Journal	1019	
7/1/2007 - 8/31/2007	Proposed			Outreach RE: Ukraine	Washington Post	1019	
7/1/2007 - 8/31/2007	Proposed			Outreach RE: Ukraine	Forbes	1019	
7/1/2007 - 8/31/2007	Proposed			Outreach RE: Ukraine	Fortune	1019	
7/1/2007 - 8/31/2007	Proposed			Outreach RE: Ukraine	Time Magazine	1019	
7/1/2007 - 8/31/2007	Proposed			Outreach RE: Ukraine	CNN	1019	

# **EXHIBIT 443**



### Outreach to Congressman Rohrabacher

Date	Event	Summary	Exhibit
<b>Pre Manafort/Weber/Rohrabacher Dinner Meeting</b>			
1/16/2013	Manafort memo to Yanukovych regarding US Congressional Resolutions - H.R. 27 and H.R. 28	"[w]e have reached out to [REDACTED] [REDACTED] . . We will brief his office and staff on the resolutions and ensure that they are not considered.	1453
1/24/2013	Email chain between the Office of [REDACTED] and Paul Manafort's office; Subject: RE: Meeting with [REDACTED]	Gates writes to [REDACTED] - "Paul wants to setup a dinner among you, he and [REDACTED] . . ." [REDACTED] office responds, cc Paul Manafort, "[REDACTED] spoke to [REDACTED] [REDACTED] . and he agreed to a dinner with Paul and [REDACTED]	1455
2/18/2013	Email from Gates to [REDACTED] and [REDACTED] Subject: Re: Deliverables	Gates states to [REDACTED] "[REDACTED] and Staff ([REDACTED] need to discuss with you - need you to meet regardless of the scheduled dinner)."	1784

443

GOVERNMENT  
EXHIBIT  
U.S. v. MANAFORT, 1:17-cr-201 (A.B.J.)

### Outreach to Congressman Rohrabacher

Date	Event	Summary	Exhibit
2/19/2013	Manafort memo to Yanukovych regarding US Government Update	"The key subcommittee for Ukraine is the House Foreign Affairs Subcommittee on Europe, Eurasia and Emerging Threats. The new [REDACTED] is Congressman [REDACTED] (a [REDACTED])."	605
2/25/2013	Email chain between Gates and the [REDACTED]; Subject: Re: [REDACTED] Visit to US	Adjusting to [REDACTED] schedule for [REDACTED] visit; [REDACTED] and [REDACTED] included.	1469
2/28/2013	Email chain between Gates, [REDACTED]; Subject: Meeting	[REDACTED] and Gates discussing setting up meeting for [REDACTED] with [REDACTED]	1946
4/27/2013	Email chain between Gates and [REDACTED] Subject: Re: [REDACTED] Update	[REDACTED] states "We have circled back with Rep. [REDACTED] office and the Congressman is unable to meet with [REDACTED] before he departs. . ."	1471

### Outreach to Congressman Rohrabacher

Date	Event	Summary	Exhibit
3/6/2013	Email chain between Gates, the [REDACTED]; Subject: Re: [REDACTED] Visit	Gates coordinating [REDACTED] visit.	1477
3/14/2013	Email chain between Manafort, Gates and [REDACTED] Subject: FW: Manafort [REDACTED] meetings on 19th	[REDACTED] rearranging schedule for Manafort's meetings in DC which included a meeting with Congressman [REDACTED]	1482
3/18/2013	[REDACTED] memo to Manafort; Subject: Briefs for March 19 Meetings	March 19 - 7:00pm dinner with Congressman [REDACTED], National Republican Club of Capitol Hill.	1484
3/18/2013	Email chain between Gates and [REDACTED] Subject: Briefing Materials for Paul	[REDACTED] arranged meetings for Manafort to include Congressman [REDACTED]	1485
3/19/2013	Calendar; Subject: Dinner / Manafort, [REDACTED] & [REDACTED] reservation under [REDACTED]	Dinner with Manafort, [REDACTED] and [REDACTED] at National Republican Club of Capitol Hill.	1486

### Outreach to Congressman Rohrabacher

Date	Event	Summary	Exhibit
<b>Post Manafort/Rohrabacher/Weber Dinner</b>			
3/23/2013	Memo; Subject: US Consultants Activity – Weekly Update	"The meeting with Cong [REDACTED] went well. He and I are building a plan to create a framework to promote positive interactions between the Govt of Ukraine and [REDACTED] [REDACTED]	695
4/5/2013	Email chain between Gates and [REDACTED] Subject: Re: EU Updates	Email to Gates that states "[REDACTED] piece went out to: [REDACTED], [REDACTED] .."	1947
4/19/2013	Email chain between Gates, the [REDACTED] and [REDACTED] Subject: Re: Report	Gates states "Paul is meeting with the President on Monday of next week. We need to put together a quarterly report with all highlights. . . Include key progress made, all relevant meetings ([REDACTED] etc).	1810

### Outreach to Congressman Rohrabacher

Date	Event	Summary	Exhibit
4/21/2013	Manafort memo [REDACTED] Subject: US Consultants Activity - Weekly Update	"Key members of the USG and their staff that were briefed directly include: [REDACTED] . ."	697
4/25/2013	Email chain between Gates, the [REDACTED] Subject: Update	Gates states "We need to add meetings with [REDACTED], please take [REDACTED] . ."	1939
4/26/2013	[REDACTED] Calendar; Subject: Call Rick Gates [REDACTED] - two things see notes	"Rick now wants us to check with [REDACTED] to see if he would be available for meeting with [REDACTED] on the 8th as well. . ."	1493
4/26/2013	Email chain between Gates, the [REDACTED] Subject: Re: Schedule Update	Gates states "Go ahead and reach out to the offices for [REDACTED] . ."	1811

### Outreach to Congressman Rohrabacher

Date	Event	Summary	Exhibit
5/10/2013	[REDACTED] Calendar; Subject: Congressman [REDACTED] he asks if you could give him a call Friday	"Appears he met with Ukraine FM and we asked for his thoughts after the meeting, etc..."	1498
5/12/2013	Email chain between Gates and [REDACTED] Subject: Re: [REDACTED]	Gates asks if "Did we have anyone covering the [REDACTED] meeting with [REDACTED] I cannot remember but have no notes from it." [REDACTED] responds "I spoke to [REDACTED] after his meeting. Will discuss."	1499
5/14/2013	Manafort memo to PM [REDACTED] Subject: Washington, DC Visits – [REDACTED]	"Meeting with Congressman [REDACTED] . . . [REDACTED] Actions. . . Visit two Congressional districts at the request of the members - [REDACTED] . . . Build an agenda to invite [REDACTED] and other [REDACTED] to come to Ukraine in the next 6 months."	705

### Outreach to Congressman Rohrabacher

Date	Event	Summary	Exhibit
5/21/2013	Email chain between Gates and [REDACTED] Subject: Re: [REDACTED] - [REDACTED]	Gates asks [REDACTED] to set up meeting in DC for [REDACTED], President of the [REDACTED] in Ukraine. Gates states "Ideally, we get him in with staff from [REDACTED]..."	1417
6/7/2013	Email chain between Gates, [REDACTED] [REDACTED] [REDACTED] and the [REDACTED]; Subject: Re: Next [REDACTED] visit	Gates asks [REDACTED] if [REDACTED] wants to meet with [REDACTED] and states "[REDACTED] is very important to Ukraine." [REDACTED] replies that [REDACTED] would be very interested.	721
2/6/2014	[REDACTED] Calendar; Subject: ECFMU Meeting with [REDACTED] [REDACTED]	[REDACTED] appointment to meet [REDACTED] [REDACTED]	1945

# **EXHIBIT 444**



Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
5/16/2012	P		Outreach	E-mail		625
5/16/2012	P		Outreach	E-mail		625
5/18/2012	P		Outreach	Presentation	US media	1351
6/1/2012	P		Outreach	Memo	Associated Press -	1354; 2059
6/1/2012	P		Outreach	Memo	Reuters -	1354; 2059
6/1/2012	P		Outreach	Memo		1354; 2059
6/1/2012	P		Outreach	Memo	Radio Free Europe -	1354; 2059
6/1/2012	P		Outreach	Memo		1354; 2059

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
6/1/2012	P	████	Outreach	Memo	National Journal - █████	1354; 2059
6/1/2012	P	████	Outreach	Memo	New York Times - Moscow Bureau	1354; 2059
6/1/2012	P	████	Outreach	Memo	Washington Post (Moscow) - ████	1354; 2059
6/1/2012	P	████	Outreach	Memo	Bloomberg (Moscow) - ████	1354; 2059
6/1/2012; 7/2/2012; 11/26/2012	P	████ Gates	Outreach	Memo	Director of Eastern and Strategic European Affairs at the NSC - ████	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	████ Gates	Outreach	Memo	████████████████████	354; 2059; 1397

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo	█	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo	█	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo	█	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo		1354; 2059; 1397

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
6/1/2012; 7/2/2012; 11/26/2012	P	████ Gates	Outreach	Memo	Congressman █████	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	████ Gates	Outreach	Memo	Congressman █████	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	████ Gates	Outreach	Memo	Congressman █████	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	████ Gates	Outreach	Memo	Senator █████	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	████ Gates	Outreach	Memo	Senator █████	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	████ Gates	Outreach	Memo	Senator █████	1354; 2059; 1397

Skadden Report Rollout						
<b>Date</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Nature of Document</b>	<b>Entity Contacted</b>	<b>Exhibit</b>
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo	Senator █	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo	Senator █	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo	Senator █	1354; 2059; 1397
6/1/2012; 7/2/2012; 11/26/2012	P	█ Gates	Outreach	Memo	Senator █	1354; 2059; 1397

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
6/1/2012; 7/2/2012; 7/18/2012	P	████	Outreach	Memo	New York Times - █████	1354; 2059; 2062
6/1/2012; 7/2/2012; 7/18/2012; 11/26/2012	P	████ Gates	Outreach	Memo	████████████████████	1354; 2059; 1397
7/2/2012	P	████	Outreach	Memo	████████████████████	2059
7/18/2012	P	████	Briefing/General Outreach	Strategy Memo	US Media (5 outlets)	2062
7/27/2012; 7/28/2012; 8/27/2012	P	████ Skadden	Briefing/General Outreach	Strategy Memo	US Media	2065; 2066; 2074



Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
8/30/2012	P	[REDACTED]	Briefing	Strategy Memo	[REDACTED]	1365
8/30/2012	P	[REDACTED]	Briefing	Strategy Memo		1365
9/21/2012; 9/23/2012	P	[REDACTED] Skadden	Outreach	Strategy Memo		2094; 1374
9/22/2012	P	[REDACTED]	Outreach	Strategy Memo	US media	830
9/27/2012	P	[REDACTED]	Outreach	Strategy Memo	Members of Senate and House	1726
10/2/2012	P	[REDACTED]	Briefing	Outline	Bloomberg News	515
10/2/2012	P	[REDACTED]	Outreach	Strategy Memo	Eurasia Foundation	1387
10/2/2012	P	[REDACTED] Gates	Briefing	Strategy Outline	Bloomberg News	1390
10/2/2012	P	[REDACTED] Gates	Briefing	Strategy Outline	[REDACTED] - Heritage Foundation	1390

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
10/3/2012	P		Outreach	Strategy Memo	New York Times - [REDACTED]	1977
10/3/2012	P		Outreach	Strategy Memo	Bloomberg - [REDACTED]	1977
10/3/2012	P		Outreach	Strategy Memo	NPR - [REDACTED]	1977
10/3/2012	P		Outreach	Strategy Memo	National Journal - [REDACTED]	1977
10/3/2012	P		Outreach	Strategy Memo	[REDACTED]	1977
10/3/2012	P		Outreach	Strategy Memo		1977
10/3/2012	P		Outreach	Strategy Memo		1977
10/3/2012	P		Outreach	Strategy Memo		1977
10/3/2012	P		Outreach	Strategy Memo		1977

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
10/3/2012	P		Outreach	Strategy Memo		977
10/3/2012	P		Outreach	Strategy Memo		977
10/3/2012	P		Outreach	Strategy Memo		977
10/3/2012	P		Outreach	Strategy Memo		977
10/3/2012	P		Outreach	Strategy Memo		977
10/3/2012	P		Outreach	Strategy Memo		977
10/3/2012	P		Outreach	Strategy Memo		977
10/3/2012	P		Outreach	Strategy Memo		977

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
11/26/2012	P	■ Gates	Briefing	Strategy Outline	US Journalists	1397
11/26/2012	P	■ Gates	Briefing	Strategy Outline	Bloomberg News	1397
11/26/2012	P	■ Gates	Outreach	Strategy Outline	■	397
11/26/2012	P	■ Gates	Outreach	Strategy Outline		397
11/26/2012	P	■ Gates	Outreach	Strategy Outline		397
11/26/2012	P	■ Gates	Outreach	Strategy Outline		397
11/26/2012	P	■ Gates	Outreach	Strategy Outline		397
11/26/2012	P	■ Gates	Outreach	Strategy Outline		397

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
11/26/2012	P	█ Gates	Outreach	Strategy Outline	█	1397
11/26/2012	P	█ Gates	Outreach	Strategy Outline		1397
11/26/2012	P	█ Gates	Outreach	Strategy Outline		1397
11/26/2012	P	█ Gates	Outreach	Strategy Outline	Politico	1397
11/26/2012	P	█ Gates	Outreach	Strategy Outline	Breitbart	1397
11/26/2012	P	█ Gates	Outreach	Strategy Outline	Daily Caller	1397
11/26/2012	P	█ Gates	Outreach	Strategy Outline	Washington Times	1397
11/26/2012	P	█ Gates	Outreach	Strategy Outline	Townhall	1397
11/26/2012	P	█ Gates	Outreach	Strategy Outline	American Spectator	1397
11/26/2012	P	█ Gates	Outreach	Strategy Outline	United Liberty	1397

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
11/26/2012	P	[REDACTED]	Outreach	Strategy Outline	Red State	1397
12/5/2012	C	Skadden	Outreach	Strategy Outline	[REDACTED]	1398
12/5/2012	C	Skadden	Outreach	Strategy Outline		1398
12/5/2012	C	Skadden	Outreach	Strategy Outline		1398
12/5/2012	C	[REDACTED] Skadden	Outreach	Strategy Outline		1398
12/5/2012	C	[REDACTED] Skadden	Outreach	Strategy Outline		1398

[illegible]

Skadden Report Rollout						
Date	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Nature of Document	Entity Contacted	Exhibit
12/5/2012	C	Skadden	Outreach	Strategy Outline		1398
12/5/2012	C	Skadden	Outreach	Strategy Outline		1398
12/11/2012	P		Outreach	E-mail		1771
12/12/2012	C	Skadden	Briefing	E-mail		2117
12/10/2012; 12/11/2012; 12/12/2012; 12/12/2012	C	Skadden	Outreach; Briefing	Phone Call; E-mail		1403; 2108; 2109; 2110; 2111; 2112; 1251; 2116; 2119; 1405
12/5/2012; 12/6/2012	C	Skadden	Interview	Strategy Outline		1398; 1402



# **EXHIBIT 448**

Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Legislation			
		Company	Political Activity	Lobbied Entity	Exhibit
5/25/2012	C	[REDACTED]	Meeting (Inhofe Resolution)	Senate	1635
5/25/2012	P	[REDACTED]	Outreach (Inhofe Resolution)	Congress	1636
5/30/2012	C	[REDACTED]	Meeting (Inhofe Resolution)	Senate	1638
5/30/2012	C		Outreach (Inhofe Resolution)	[REDACTED] (Senator [REDACTED] Office)	1639

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
5/30/2012	C	[REDACTED]	Outreach (Inhofe Resolution)	Senate	1640
5/30/2012	C	[REDACTED]	Outreach (Inhofe Resolution)	[REDACTED] (Senator [REDACTED] Office)	1644
7/17/2012	P	[REDACTED] Gates	Outreach (Smith Resolution)	US Congress	1672
9/14/2012	P	[REDACTED]	Outreach (Durbin Resolution)	[REDACTED] (Senator [REDACTED] Office)	1691

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
9/14/2012	P	[REDACTED]	Outreach (Durbin Resolution)	US Senators on Senate Foreign Relations Committee	1691
9/17/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Roll Call	1169
9/17/2012	A	[REDACTED]	Outreach (Inhofe Resolution)	Republican House Leadership	1695
9/17/2012	A	[REDACTED]	Outreach (Smith Resolution)	Congress	1695

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
9/17/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1695
9/17/2012	P	[REDACTED]	Outreach (Durbin Resolution)	[REDACTED] (Senator [REDACTED] Office)	1695
9/17/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1695
9/17/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1695

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
9/17/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1695
9/17/2012	P	[REDACTED]	Outreach (Smith Resolution)	Congressman [REDACTED]	1695
9/17/2012	C	[REDACTED]	Outreach (Durbin Resolution)	Senate Foreign Relations Majority Staff	1697
9/17/2012	C	[REDACTED]	Outreach (Durbin Resolution)	[REDACTED] (Senator [REDACTED] Office)	1698



<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
9/19/2012	P	██████████	Outreach (Durbin Resolution)	Senator ██████████	1172
9/19/2012	C	██████████	Outreach (Durbin Resolution)	Senator ██████████	1173; 1175
9/19/2012	C	██████████ Gates	Outreach (Durbin Resolution)	Senator ██████████ Chief of Staff	1308
9/19/2012	P	Skadden ██████████ ██████████	Outreach (Durbin Resolution)	Senator ██████████	1308

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
9/19/2012	A	█████ Gates	Outreach (Durbin Resolution)	Senator █████	1308; 1703
9/19/2012	P	██████████	Outreach (Durbin Resolution)	Senator ██████████	1702
9/19/2012	P	██████████	E-mail (Durbin Resolution)	State Department	1702
9/20/2012	P	██████████ █████	Outreach (Durbin Resolution)	Senator ██████████	1708



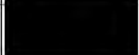
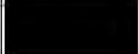


<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
9/20/2012	A	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1706; 1709
9/21/2012	C	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1712; 1713; 1718; 1719; 1723
9/22/2012	P	[REDACTED] Gates	Outreach (Durbin Resolution)	Senator [REDACTED]	1719
9/22/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1712





<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
9/22/2012	C	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1723
10/3/2012	C	[REDACTED] Gates	Outreach (Durbin Resolution)	Senator [REDACTED]	1732
10/18/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1744
10/18/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1744





<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
10/18/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1744
10/18/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1744
10/18/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1744
10/18/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1744

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
10/18/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1744
10/18/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1744
10/18/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1744
10/18/2012	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1744

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
10/18/2012	C		Outreach (Durbin Resolution)	House Foreign Affairs Committee - Democratic Staff Members	1744
10/18/2012	C		Outreach (Durbin Resolution)	Senate Foreign Relations Committee - Democratic Staff	1744
10/23/2012	P		Outreach (Smith Resolution)	House Foreign Affairs Committee - All Members	1748
10/23/2012	P		Outreach (Smith Resolution)	Senate Foreign Relations Committee - All Members	1748



<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
10/23/2012	P		Outreach (Smith Resolution)	Senate Leadership	1749
10/23/2012	P		Outreach (Smith Resolution)	House Leadership	1749
10/23/2012	P		Outreach (Smith Resolution)	Helsinki Commission Members - Congress	1749
10/23/2012	P		Outreach (Smith Resolution)	Helsinki Commission Members - US Government	1749

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
10/23/2012	P		Outreach (Durbin Resolution)	Senate Leadership	1749
10/23/2012	P		Outreach (Durbin Resolution)	House Leadership	1749
10/23/2012	P		Outreach (Durbin Resolution)	Helsinki Commission Members - Congress	1749
10/23/2012	P		Outreach (Durbin Resolution)	Helsinki Commission Members - US Government	1749

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
11/19/2012	C	[REDACTED]	Outreach (Smith Resolution)	Congressman [REDACTED]	1761; 1448
11/19/2012	P	[REDACTED]	Outreach (Smith Resolution)	[REDACTED]	1761; 1448
11/19/2012	P	[REDACTED]	Outreach (Smith Resolution)	[REDACTED]	1761; 1448
11/19/2012	C	[REDACTED]	Outreach (Smith Resolution)	House Foreign Affairs Committee Members	1761



<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
12/14/2012	P	[REDACTED]	Outreach (Smith Resolution)	Congressman [REDACTED]	1448
12/14/2012	C	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1448
12/14/2012	C	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1448
1/16/2013	C	[REDACTED]	Outreach (Kaptur Resolution)	Congressman [REDACTED]	1453

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
1/16/2013	C	[REDACTED]	Outreach (Kaptur Resolution)	Congressman [REDACTED]	1453
2/13/2013	P	[REDACTED]	Outreach (Kaptur Resolution)	Congressman [REDACTED] - Staff	1464
2/13/2013	P	[REDACTED]	Outreach (Kaptur Resolution)	Congressman [REDACTED] - Staff	1464
2/13/2013	P	[REDACTED]	Outreach (Kaptur Resolution)	Senator [REDACTED] Staff	1464

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
2/13/2013	P	[REDACTED]	Outreach (Kaptur Resolution)	House Foreign Affairs Committee - Staff	1464
6/18/2013; 8/5/2013	C	[REDACTED]	Meeting (Durbin Resolution)	Senator [REDACTED]	1831; 1841
6/25/2013	P	[REDACTED] Gates	Outreach (Durbin Resolution)	Senator [REDACTED]	1835
6/25/2013	C	[REDACTED]	Meeting (Durbin Resolution)	Senator [REDACTED]	1836; 624; 720

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
6/25/2013	C	[REDACTED]	Meeting (Durbin Resolution)	State Department	1836; 624
6/26/2013	P	[REDACTED]	Outreach (Durbin Resolution)	Senator [REDACTED]	1514
7/10/2013	P	[REDACTED]	Outreach (Durbin Resolution)	Congress	708
7/11/2013	P	[REDACTED] Gates	Outreach (Durbin Resolution)	Senator [REDACTED]	1838; 1839

<b>Date(s)</b>	<b>Proposed, Attempted, or Completed (P, A, C)*</b>	<b>Company</b>	<b>Political Activity</b>	<b>Lobbied Entity</b>	<b>Exhibit</b>
7/25/2013	P	[REDACTED] Gates	Outreach (Durbin Resolution)	Senator [REDACTED]	1840
9/25/2013	P	[REDACTED]	Outreach (Durbin Resolution)	Congress	1852
9/30/2013	C	[REDACTED]	Meeting (Durbin Resolution)	Senator [REDACTED]	1853
10/8/2013	C	[REDACTED]	Meeting (Engel Resolution)	Congressman [REDACTED] - Staff	1856



Date(s)	Proposed, Attempted, or Completed (P, A, C)*	Company	Political Activity	Lobbied Entity	Exhibit
11/20/2013	C	[REDACTED]	Outreach (Durbin Resolution)	Congressional Staff [REDACTED]	1531
2/18/2014	A	[REDACTED]	Outreach (Menendez Resolution)	Senator [REDACTED] - Staff	1545; 1546

# **EXHIBIT 449**

		Legislation: [REDACTED] Resolution	
Date	Person/Company(ies) Involved	Summary of Contact	Exhibit
9/14/2012	[REDACTED] Gates	Gates to [REDACTED]: "Has anyone talked with [REDACTED] at the Committee?" [REDACTED] employee writes "[W]e need to find members opposed to moving the resolution through the express lane - and being hot-lined... A colleague of mine has been reaching into the committee to get intel."	1691
9/17/2012	[REDACTED]	[REDACTED] to [REDACTED] "With all due respect you too often question our requests by double-checking with Paul. You know I take of Yulia's case for bull-shit but I'm not sure the Bug [sic] Guy shares my view. Let's be frank, if Paul could stop [REDACTED] resolution on his own we wouldn't have asked you to do something like this."	1167
9/17/2012	[REDACTED]	[REDACTED]: "The Big Guy has given an instruction" to get reporting that Tymoshenko's alleged involvement in a murder be in "any paper that is read on the Hill...It can be the Roll Bell...It must influence the future of [REDACTED] Resolution..." [REDACTED] response to [REDACTED] "very bad idea."	1169





Date	Person/Company(ies) Involved	Summary of Contact	Exhibit
9/17/2012	[REDACTED]; Gates	Gates to [REDACTED]: "Paul is meeting with President at 800am US time this morning. I need anything we have as updates regarding any resolution against [REDACTED] including House/Senate schedules... I need [REDACTED] to cover [REDACTED] and [REDACTED]...to ask for the measure to [sic] carried over to the next meeting." Gates adds "We need to cover this base and think about lining up several [REDACTED] who will put a hold on the measure."	1695
9/17/2012	[REDACTED] [REDACTED]	[REDACTED] employee e-mails [REDACTED], and Gates about discussion with [REDACTED]: "I didn't have the opportunity to bring up the report as frankly I thought it too would be viewed as another stall tactic." [REDACTED] employee forwards e-mail from [REDACTED] on [REDACTED] re the resolution	1697; 169
9/19/2012	[REDACTED]	[REDACTED] to [REDACTED] "Would it be possible to reach out to [REDACTED] and ask him to make an early morning call to [REDACTED] regarding the [REDACTED] noted "Paul works through his channels and is sending the same messages."	1172
9/19/2012	[REDACTED]	[REDACTED] to [REDACTED] and [REDACTED] "[REDACTED] already spoke with [REDACTED]	1173; 117

Date	Person/Company(ies) Involved	Summary of Contact	Exhibit
9/19/2012	[REDACTED] Manafort; Gates	Manafort e-mails Gates and [REDACTED] regarding talking points to share with [REDACTED] re Tymoshenko case. Gates to [REDACTED] and Manafort: "Message was delivered to [REDACTED] and he is now aware." [REDACTED] to Manafort: "[REDACTED] is delighted to speak to [REDACTED] [sic] and try to calm things down." Friedman adds: "[REDACTED] ALSO happy to speak to [REDACTED] and ask hm [sic] to delay or tone down or stop the resolution".	1308
9/19/2012	[REDACTED] Gates	Gates to [REDACTED] "Please call [REDACTED] office and pass along the notes below verbally. Let me know when you make contact." [REDACTED] to Gates: "Left this message on his vmail asked him to call me back."	1703
9/19/2012	[REDACTED] Manafort; Gates	Manafort to Gates: "Is [REDACTED] calling [REDACTED] Gates to Manafort: "He was supposed to talk with [REDACTED] yesterday but I have not heard back. Trying to reach him. I will brief him on the other items and see if he can call [REDACTED] as well."	1308
9/19/2012	[REDACTED]; Gates	[REDACTED] employee to Gates: "Rick, Just heard again from [REDACTED] office that [REDACTED] and [REDACTED] intend to move the resolution. [REDACTED] does not advise this but will NOT block it." [REDACTED] to Gates: "Plan is and was find a senator who will put hold on it... Seeing [REDACTED]." [REDACTED] adds: "[REDACTED] has signed off on resolution."	1702

Date	Person/Company(ies) Involved	Summary of Contact	Exhibit
9/20/2012	[REDACTED] Gates	[REDACTED] employee to Gates: "[REDACTED] has a call into [REDACTED] - don't think they have connected, yet."	1706
9/20/2012	[REDACTED]; Gates	[REDACTED]: "We just got off the phone with Rick, who asked taht I check with you re: possible conversation with [REDACTED] He was wondering if you had anything worth sharing/reporting. Mentioned [REDACTED] diaspora in [REDACTED] Next steps: [REDACTED] reaching out to [REDACTED] again." [REDACTED] replies: "Have call into [REDACTED]"	1709
9/20/2012	[REDACTED] Gates	Gates e-mails [REDACTED] with subject line "United Coal": "[REDACTED] Here is the document on United Coal. Please get to [REDACTED] The United operations are very big in [REDACTED] and represent many jobs (I know not Ukrainian) but the investor is and he is making significant investments into the operations." [REDACTED] asks "Do they have a pac. Have they done [REDACTED]?"	1708
9/21/2012	[REDACTED]	[REDACTED] staff discusses [REDACTED] outreach to [REDACTED] between 9/21 - 9/22. [REDACTED] employee writes: "[REDACTED] released the hold. [REDACTED] told me: 'That's why he called your boss back. [REDACTED] was going to make us object on the floor and was taking it really personally, so we let it go.'" [REDACTED]	1712
9/22/2012	[REDACTED]	[REDACTED] to Gates, [REDACTED] employees: "Spoke with [REDACTED] 10 times tonight[.] Keep [REDACTED] strong."	1719

Date	Person/Company(ies) Involved	Summary of Contact	Exhibit
9/22/2012	[REDACTED] Gates	[REDACTED] employees dicuss call with Rick Gates: "Nothing really discussed except that Rick will prepare alternative language in case we can't kill and are being asked what is acceptable to them."	1717
9/22/2012	[REDACTED] Gates	Gates to [REDACTED] "Here is an OpEd from two days ago written by former [REDACTED] and former [REDACTED] [REDACTED] You may want to pass it along to Sen. [REDACTED]." In reference to op-ed, [REDACTED] replies to [REDACTED] "Not sure [] would have swayed [REDACTED] making an enemy out of [REDACTED]"	1713
9/22/2012	[REDACTED]; Gates	[REDACTED] employee to Gates: "Rick. [REDACTED] resolution] just passed."	1714
9/22/2012	[REDACTED] Gates	Gates to [REDACTED] and [REDACTED] "Any update on [REDACTED] [REDACTED] to Gates and [REDACTED] "[REDACTED] would not go to war with [REDACTED] over this at last minute without a full understanding of facts and history."	1718

Date	Person/Company(ies) Involved	Summary of Contact	Exhibit
9/24/2012	[REDACTED]; Gates	Gates to [REDACTED]: "Despite the outcome I want to thank you again for your assistance last week in attempting to defeat the resolution... On a separate issue, I have the [REDACTED] to [REDACTED] coming down to DC for the day tomorrow [and] would like to setup two or three meetings for him." Gates suggests "[REDACTED]" and "any of the [REDACTED]."	1724
9/25/2013	[REDACTED] Gates	Regarding another [REDACTED] Resolution in 2013, [REDACTED] employee states: "Rick wants us and [REDACTED] team to find key fundraisers in Congressional districts where there a lot [sic] of [REDACTED] Americans to press the Members to come out against [REDACTED] and oppose legislation calling for her release. His argument is that if you support her you are forcing [REDACTED] into the hands of the [REDACTED]"	1852

# **EXHIBIT 504**

CONFIDENTIAL: EYES ONLY

**CREATION OF A SUPER VIP GROUP OF FORMER EUROPEAN HEADS OF GOVERNMENTS  
AND VIP OFFICIALS TO ENGAGE IN PROMOTION OF VR ELECTION RESULTS AND  
UKRAINE INTEGRATION INTO EUROPE**

**1. Purpose**

To assemble a small group of high-level European highly influential champions and politically credible friends who can act informally and without any visible relationship with the Government of Ukraine.

The engagement of this group will be in two stages. The first stage is 2012 and will be informal in nature. The work in 2012 will primarily focus on the promotion of the importance of Ukraine to Europe, to push for the acceleration of integration of Ukraine and to engage in the process to ensure the recognition of the results of the 2012 VR elections.

The second stage in 2013 would channel this group into an independent NGO whose mission would be to work with the EU, European governments, NGOs and the government of Ukraine to hasten the integration of Ukraine into Europe.

The uniqueness of this group is in its composition of members who have the ability to engage at the highest levels and speak with authority in the media.

**2. Mission**

The principal mission of this group in 2012 will be to serve as a bridge between the main international election observer groups, OSCE and PACE, and the government of Ukraine. They would engage as ad hoc observers of the VR election process and could perform pre-election oversight of Ukraine compliance with the main conditions demanded by the European Groups to ensure a free and fair election. They can perform this work in a manner similar to the audit performed by Skadden, Arps.

Additionally, the members of the group, at our quiet direction, will provide commentary in the European media. write and publish occasional op-eds and appear at select conferences we will stage in Rome, Berlin, Paris, London or Brussels before and after the election.

**3. Key Participants**

The intention is to begin with a group of about 5 senior members. They would be approached by Chancellor [REDACTED] and would work informally at his direction, in co-ordination with me, during the remaining 6 months of 2012. The list of potential members include:

- [REDACTED] Chancellor [REDACTED]  
[REDACTED] He will be the co-ordinator.
- [REDACTED] Former Prime Minister [REDACTED], or former [REDACTED] Minister [REDACTED]
- [REDACTED] Judge [REDACTED] veteran and respected center-right member of [REDACTED] A legal expert who has served previously on [REDACTED] we think we could engage him on a spot basis.

- [REDACTED] Former European troubleshooter, [REDACTED] minister to [REDACTED] Head of the [REDACTED] supervisor of the [REDACTED] (see links below)
- [REDACTED] and [REDACTED] respected man for all seasons in Europe. Friend of [REDACTED]
- [REDACTED] will select someone from France but precisely who will be determined by who does not become a part of the Hollande Administration.
- not that the Government is being organized.
- Although his appointment as [REDACTED] [REDACTED] would prevent [REDACTED] from any formal activity, [REDACTED] will meet him June 29th and will discuss with him the idea of [REDACTED] joining a more formal Advisory Panel in 2013. He is confident that this is very likely and believes that some informal and covert interaction is possible in 2012.

#### 4. Structure and Fees

Led by former Chancellor [REDACTED] the other former leaders from [REDACTED] would act as an informal, independent group in 2012 and would form or associate with an existing NGO in 2013. The creation of this entity in 2013 would publicly be connected to the informal work that they did in 2012.

The informal and ultimately formal project will be managed by Chancellor [REDACTED] in co-ordination with me.

The budget for the 6 months of 2012 would be E1,500,000. This would include travel expenses, administrative overhead, and retainer fees to all of the key individuals, speakers fees to VIPs who will appear at the conferences and election observer fees.

The budget for conferences will be created based on the purpose and logistics of the events. It is anticipated that we would do at least 2-3 such conferences in 2012 to promote the objectives of integration and election recognition. It is anticipated that a typical budget for a conference will be in the range of Euro20,000.

#### 5. Next Steps

Chancellor [REDACTED] is speaking with former President [REDACTED] on Sunday at the Euro 2012 football game in Warsaw. They will agree on their plan of action.

Upon approval of the project by Ukraine, they will commence work this week. This work will result in the outreach to the officials listed above and others. Once the group is organized, the specifics of a work plan will be created by the Chancellor and us.

ACTION: Approve and fund project by July 1.



# **EXHIBIT 505**

To: [REDACTED]  
From: PJM  
Re: Program to Conduct Briefings of Embassies, Media and NGOS  
Date: July 3, 2012

As we begin the formal election process it is important that we keep the international community briefed on the important election updates.

The opposition is already planting the seeds to claim that the election is unfair. Through regular briefings of the Embassy staffs, NGO offices and international media they are claiming that the PoR is using administrative resources to "steal the election".

We must get into these same channels to promote our positions and to listen to any of their criticisms to make it look as if we are being responsive to their concerns.

There are several types of briefings that we should organize. This memo seeks to identify these briefings, outline the types of issues which should be discussed and who should be meeting with the international community.

#### **Administration of Election – CEC**

The CEC should conduct a series of private briefings to update the international community on the progress of the election process. These briefings should be in addition to the regular public briefings of the CEC.

The private briefings should be directed at the key NGOs and Embassies in Kyiv.

Similar to the European tour that [REDACTED] is making, these briefings would update the audience on the implementation of the election law. The details of the management of candidate applications, organizations of DEC's, PECs and oversight of the election day activities should comprise the agenda.

Someone from the CEC should be designated to do these briefings in order to maintain consistency in reporting. The briefings will be very time consuming so the person designated should have the time to commit to this important function. Given that [REDACTED] is conducting briefings in Europe, he may be the best one but that is a decision that should be taken quickly.

The goal is to ensure that the audiences understand the election complaints as they are occurring and witness the solutions in real time. In this way, when the opposition approaches these same people to complain about certain violations, the audience is already educated and knowledgeable. This will allow correct assessments to occur in real time.



### **Management of the Election Process – PoR**

The explanation of why the PoR is going to win and how we are managing the campaign process is very important to communicate.

It is important that we maintain a frequent briefing schedule with the key embassies and opinion-makers (like AMCHAM, European Business Association, Kyiv offices of OSCE, World Bank, IMF, EBRD etc) on the election process. Each of the target audiences should be briefed at least twice a month.

Because these briefings need to be personal in nature to be effective, it is important that the person briefing be a part of the campaign leadership. Such people are [REDACTED] [REDACTED] The campaign should organize who of the 3 is best to brief what embassy or NGO or organization. Once the assignments are made, they should remain for the entire campaign.

There are 3 important components to these briefings.

First is the strength of our organization. By regularly demonstrating the growth of our local organizations, we must show how we are the only real political party and why we are confident that this organization can deliver the vote if among disillusioned former PoR voters. Without giving away secrets, we can and must flex our organizational advantages to these audiences.

Second is the rationale for why we are going to win. Again, without giving away campaign secrets, we must demonstrate a confidence in our winning the election. Through the use of public and private polls, we can demonstrate in a clear and convincing way how we expect to win control of the next VR. While some may not believe we are correct, the more that they hear it in private conversations, the more it will blunt some of the absurd rhetoric being promoted by the opposition.

Third is to use these meetings to raise our concerns about opposition abuses and violations.

Additionally, through these regular, private briefings we will hear complaints or concerns from the Embassies. Where possible, we should commit to addressing the complaints. Then we should follow through with correcting the mistakes where they are more mistakes of omission than commission.

There will be some issues, like access to media, that we should prepare statistics to refute at the appropriate time.

### **Co-ordination with the International Observer Groups - MFA**

The Observer groups are a unique organizations. They need to be managed on a formal basis and occasionally on an informal basis.

The formal basis focuses on the invitations, registration and management of the observers. This role should be done by the MFA.

In many respects, the MFA is already interacting with the key organizations. We need to expand the interaction to being some subtle lobbying in addition to the formal registration roles.

One person should be assigned to deal regularly with OSCE, ODIHR, PACE and other key election groups. The agenda should be disguised as informative and administrative. But, in addition to these functions, we should be communicating important information demonstrating the fairness and transparency of the process.

Where there are issues which are raised, the MFA should send them to the appropriate place to be answered or fixed. Being competent and engaged will overcome many minor issues which, if left alone, might combine to create impressions that often are not true.

#### **International Community**

In addition to the audiences in Ukraine, it is important that we deal with the target countries in their capitals. The Brussels NGO that we have formed and their consultants are already engaged in the process.

As briefing materials are created for the domestic briefings they need to be transmitted to the international community for use.

#### **Issues to Prepare for Briefings**

The political briefings by the PoR should be prepared to include a number of topics in addition to the organizational advantages and reasons to expect victory.

The PoR briefers must be prepared to deal with issues such as the following:

- i. access to media equal for all parties – show proof
- ii. harassment of officials – prepare cases of opposition activity
- iii. difficulty to vote/pressure on voters or system
- iv. denying all parties equal access
- v. code of conduct to govern behavior of PoR organization in the VR Election process

The CEC and MFA should be prepared to brief on issues such as

- vi. implementation of the law without prejudice
- vii. organization of SMDs fairly
- viii. creation of PECs, DEC
- ix. processing and approval of candidacy applications
- x. protection of ballot

**Conclusion**

These roles and schedule should be organized immediately.

This master program must be organized and implemented by July 15.

A command and control center should be set up to manage all of these pieces in a coherent way.

Regular meetings of the key briefers for all groups should occur weekly to compare notes, identify issues and organize follow-up.

# **EXHIBIT 569**

## небольш просьба

---

**From:** Константин Килимник [REDACTED]  
**To:** [REDACTED]  
**Date:** Wed, 11 Apr 2012 05:17:55 -0400  
**Attachments:** ac update 4-9-2012.docx (113.97 kB)

---

Прив

Можешь это быстренько на русском сделать?

Спасибище

К



## MEMORANDUM

**To:** VFY  
**From:** PJM  
**Subject:** AC Project – Update  
**Date:** April 8, 2012

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This document provides an update on the public affairs activity that has occurred since the inception of the project a few weeks ago. It is my intention to provide you with a weekly update moving forward.

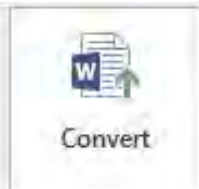
- The structure of the team has been finalized and the firms have already begun work in Europe and the US.
- We are using [REDACTED] to cover Europe (Brussels, London, Paris and Berlin) and the US (Washington DC and New York)
- The firms have begun both political and media audits in Europe and the US
- Two key and time sensitive projects are underway
  1. VR Commission Report – Interviews and roundtables throughout Europe over the next two weeks
  2. CPC – public affairs campaign underway for releasing critical information on this reform. Press release going out as soon as legislation is passed evidencing that it is in line with European standards
- Other projects being worked on include a US congressional delegation to Ukraine in May, Euro 2012 media strategy for Ukraine, and work for the elections in October (international observers)
- Digital and Social Media Campaign – this is underway with content being developed to reach more key audiences. New and enhanced websites are being developed as part of the campaign.
- Strategic Plans – the consultants are finalizing their strategic plans for the next 6-months. This accounts for key decision makers in the EU and EC, and a global media campaign.
- Also, we now have in place daily news monitoring in all major cities in Europe and the US
- Kick-off meetings have taken place in Europe and the US the last week of March



# **EXHIBIT 695**

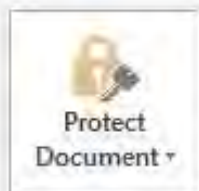
# Info

ad\_tmp\_VFY weekly activity memo 3-23-13\_fabb7407-4fc7-44d1-aa79-efa7f149bcb7



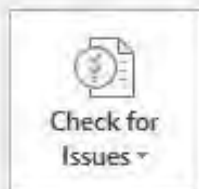
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Some new features are disabled to prevent problems when working with previous versions of Office. Converting this file will enable these features, but may result in layout changes.



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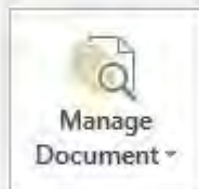
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GOVERNMENT

EXHIBIT

U.S. v. MANAFORT, 1:17-cr-201 (A.B.J.)

695

## MEMORANDUM

To: [REDACTED]  
From: PJM  
Subject: US Consultants Activity – Weekly Update  
Date: March 23, 2013

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There are a number of key events this week, most notably the IMF delegation travelling to Kyiv. Our efforts in the last week have focused on a number of themes that have played well in the US and in Europe.

### IMF Meetings

Our consultants were able to gather important intelligence from the IMF and the US State Department, which is working in coordination with the IMF. The meetings were initiated on the part of the IMF, with the hope that another stand-by arrangement could be negotiated.

- Most importantly, the IMF is going into the meetings next week under no illusion that the GoU is going to reduce the consumer gas tariffs. From the IMF perspective it is still an open issue and will be raised in that context.
- The meetings are primarily a follow-up to their late January/early February visit during which they were "somewhat encouraged" by those discussions about what Ukraine is willing to do re: economic reform.
- Next week's visit is to determine what specific steps Ukraine is willing to take to reach another "Standby Agreement" with the IMF. All options are on the table and it is meant to be a dialogue on how to reach consensus if possible.
- Among other items, the IMF argues that gas prices need to be "more realistic" (given how heavily subsidized they currently are). It is an important part of what Ukraine needs to do and it will be raised again in the discussions.
- Ukraine must also devalue its currency and this will be raised as well.
- Bottom-line is the IMF hopes to see if the GoU is serious about making some long-term economic reforms – their concern is that the previous two agreements were suspended because of a "lack of follow-through" on the Ukrainian's part.

[REDACTED]

This meeting was important for several reasons and it came at a crucial time. My sources in the USG tell me that the meeting was construed as positive, and progress has been made in Ukraine but there is more work to do.

- The reforms on judicial reform have been noted and this is an area where the USG has made progress. Obviously, the US is not pleased (in their view) with the issue of selective justice in regards to VT and YL.
- However, it was clear that in sending [REDACTED] to Kyiv, the US wants to engage Ukraine.
- She clearly stated that the US opposes sanctions with Ukraine, and that the only way to move relations forward is to engage the GoU.
- One of the primary purposes of the meeting with VFY was to pave the way for an official meeting with [REDACTED] and [REDACTED]. This is a positive development.



- In addition, VFY did a good job of framing the importance of EU integration, which the US fully supports and will promote through its resources.

#### Meeting with Congressman [REDACTED]

The meeting with Cong [REDACTED] went well. He and I are building a plan to create a framework to promote positive interactions between the Govt of Ukraine and [REDACTED]

Cong [REDACTED] is open minded on Ukraine. He is prepared to visit Ukr to gain more understanding. He is opposed to sanctions and said he would not let the [REDACTED] entertain any proposed legislation regarding sanctions for Ukraine.

#### Meeting with [REDACTED]

[REDACTED] is willing to open doors with the Disapora and NGOs to assist in the development of broader knowledge of what is happening.

It was suggested by both [REDACTED] that the promised funding by the Govt of Ukraine for the Holodiar Memorial in Washington DC would be a big deal to the Disapora.

#### News Articles

This week we directed the efforts of a number of positive news articles that appeared in several prominent publications and in the digital media space. These articles were done in tandem with key efforts we have been focusing on to emphasize the positive progress Ukraine has made on several key issues.

Below is the title of the article and which media outlets published the stories. The links to the full article's are also below for reference.

#### ***"International Finance Corporation Making Ukraine Better for Businesses, Says Yanukovych" – March 22nd***

Story on the positive meeting between VFY and the IFC's CEO in Kyiv this week.

Major Publications: Wall Street Journal, Bloomberg, Reuters, Boston Globe, San Francisco Chronicle, Deutsche Presse Agentur, and Yahoo News.

<http://www.marketwatch.com/story/international-finance-corporation-making-ukraine-better-for-businesses-says-yanukovych-2013-03-22>

#### ***"Ukraine Opposition Surprises Supporters by Denouncing Gay Marriage" – March 19th***

Story on demeaning statements by opposition leader Arseniy Yatsenyuk regarding homosexuality.

Major Publications: Wall Street Journal, Bloomberg, Boston Globe, and Business Journal.

[http://finance.boston.com/boston/news/read/23725338/ukraine\\_opposition\\_surprises\\_supporters\\_by\\_denouncing\\_gay\\_marriage](http://finance.boston.com/boston/news/read/23725338/ukraine_opposition_surprises_supporters_by_denouncing_gay_marriage)

#### ***"European Praise For Kiev's Integration Efforts While Ukraine Opposition Earns A Rebuke" – March 15th***

Story on Commissioner for EU Enlargement Stefan Fulle's plenary session speech in Strasbourg

supporting Ukraine's quest for EU integration.

Major Publications: Reuters, Wall Street Journal, MSN Money, the Business Journal and Bloomberg.

<http://investing.businessweek.com/research/markets/news/article.asp?docKey=600-201303150500PR NEWS EURO ND enUK201303147175 Publ-1>

***"US and Ukraine arm in arm on nuclear non-proliferation and EU Integration" – March 21***

Story following the meeting between VFY and US of State Wendy Sherman highlighting successes of the meeting.

Major Publications: Google News (#1 story globally), Yahoo News (#3 story globally)

<http://www.prnewschannel.com/2013/03/21/us-and-ukraine-arm-in-arm-on-nuclear-nonproliferation-and-eu-integration/>

***"Ukraine Stands with Israel on Iran Nuclear Crisis" – March 19<sup>th</sup>***

Story highlighting the positive relationship between Ukraine and Israel - article was published on the eve of President Obama arriving for his trip to Israel.

Major Publications: Google News (#1 globally within 7 minutes of release), WSJ, Bloomberg, WP, and Reuters.

<http://www.prnewschannel.com/2013/03/19/ukraine-stands-with-israel-on-iran-nuclear-crisis/>

# **EXHIBIT 833**

**From:** [REDACTED]  
**Sent:** Fri, 28 Sep 2012 08:22:59 -0400 (EDT)  
**To:** [REDACTED]  
**Subject:** Fw: eyes only  
**Attachments:** VY Memo - [REDACTED]

---

You never saw this

— Forwarded Message —

**From:** Paul Manafort [REDACTED]  
**To:** [REDACTED]  
**Sent:** Friday, 28 September 2012, 13:52  
**Subject:** eyes only

Here is the result of my meeting yesterday. Pls keep to yourself only. don't circulate to anyone

GOVERNMENT  
EXHIBIT  
U.S. v. MANAFORT, 1:17-cr-201 (A.B.J.)  
**833**



EYES ONLY

To: VFY  
From: PJM  
Re: Meeting in NYC with [REDACTED]  
Date: September 28, 12

Last night I met with [REDACTED] for 2 hours to review both the contents of the Skadden Report and the report to [REDACTED] that he will make on Oct 2. In this memo, I summarize our conversation and present some ideas based on the conversation.

**Summary of Meeting**

***1. Skadden Discussion***

I presented the key findings of the Skadden Report and focused on 2 points.

The first is that the Report states clearly that from a legal standpoint Tymo has not made the case against the President of selective prosecution and in fact her conviction was based on the factual record created in the trial.

Second, I indicated that most of the Due Process violations that she claims are rejected by the Skadden Report, and even the one issue where Skadden finds some merit (the 3 day period when Tymo was without counsel while witnesses testified), the root of the problem was caused by Tymo's behavior that would be found unacceptable in a Western Court.

[REDACTED] seemed satisfied with the analysis and conclusions. He thought that the report would be a good foundation for the Report he was preparing which focused more on the political and humanitarian aspects of the situation.

***2. [REDACTED] Report Discussion***

[REDACTED] said his report will be a neutral report. He also said that he would ask [REDACTED] to allow he and [REDACTED] to continue working on the matter until the end of 2012. He felt that [REDACTED] would agree and the [REDACTED] would approve.

The contents of his interim report are divided into 3 sections.

Humanitarian	This section deals with the medical treatment and conditions on imprisonment. The findings in this report are neutral to positive. The access to medical treatment, access to doctors and outsiders are all positively presented.
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Legal	This part of the report focuses on the changes Ukraine has made to westernize its legal framework, especially the new CPC and the work on the Law of Prosecutors. The Report will indicate much has been done but more needs to be done and that the EP should assist Ukraine in this transition from a Soviet style of law to a western rule of law society.
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[REDACTED]



Selective  
Prosecution

This is the more political aspect of the Report and the one that is still in flux. The Report will say that Ukraine is making some progress but there is still more to be accomplished. The Ivaneschenko matter will be positively referred to but the question of arbitrariness of the police will be highlighted

### Next Steps

After we discussed the 2 reports, [REDACTED] said that from his standpoint the critical timeframe is the period from Oct 28 to Nov 19. He stated several times that if there was going to be a solution this is when it must occur.

He highlighted this timeframe based of his understanding that when the new CPC comes into effect, almost 50% of people in prison today (and not tried yet) will be released pending resolution of their cases. His point was that this is the period when VY should provide a pardon to Tymoshenko that frees her but doesn't remove the conviction, thereby prohibiting her to run for political office.

I made the argument that she would never accept such a pardon and that Europe would not see it as a solution. He disagreed. He said he felt that he and [REDACTED] and others could prevail on [REDACTED] who has her own issues and wants to get Ukraine [REDACTED]

When I asked what pre-conditions could be put in place, he was vague. It was clear to me that, at this point, this is his idea and that he does not have authority to negotiate from [REDACTED] or others yet.

I made it clear that the Tymoshenko trial was not based on fear of her political standing and that in fact she was at 15% when the matter started and in the latest polls she is still at 15%. I also pointed out that every time VY makes a concession to Europe they "move the goal posts" and ask for more. *I made the point that from my personal view, if VY is going to make a humanitarian gesture that supersedes the conviction, there must be a "greater good for Ukraine", meaning a breakthrough on the matters under consideration with Europe.*

We dealt with these points for a while. [REDACTED] said that he believed a part of the solution could be the implementation of the visa policy, rescheduling the EU-Ukr summit and prioritizing a number of bilateral issues.

To [REDACTED] this approach and this timeframe offered VY a road back to Europe on a timetable that would enhance his Presidential re-election prospects. He was anxious to pursue the opportunity and we agreed to be in communication after his report is released next week. He expects to be back in Ukraine in about 2 weeks.

### Conclusions

[REDACTED] wants to help.

[REDACTED]

He believes that there is a path to a solution and based on what VY said to him, he believes that VY wants his help to find the solution.

He wants to meet with Andrey Portnov, based on VY statement that Porntov can help [REDACTED] figure out the legal part of the pardon.

Beyond that he is looking for a sign from VY that he should put his prestige into forcing EU leaders to seek a solution based on a TYMO pardon but no political participation.

In the meantime, he agreed to help me sell the Skadden Report to the EU leadership. I asked him to stress the fact that the Skadden Report presents a legal analysis and that this analysis should be given weight. Furthermore, I indicated that if the Europeans embraced the findings it would make his "political" task more doable in that the mark against VY would be removed. He agreed to help.



# **EXHIBIT 852**

**From:** [REDACTED]  
**Sent:** Fri, 17 May 2013 04:13:01 -0400 (EDT)  
**To:** "Paul Manafort" [REDACTED]  
**Subject:** DC notes  
**Attachments:** May 16th late .doc

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Here ya go.

**GOVERNMENT  
EXHIBIT**  
U.S. v. MANAFORT, 1:17-cr-201 (A.B.J.)  
**852**

EYES ONLY

For: PIM

From: [REDACTED]

Subject: [REDACTED] on May 16<sup>th</sup>

1. Our friend [REDACTED] accompanied his Prime Minister during the [REDACTED] meeting on May 16<sup>th</sup>, as well as at the official luncheon. The twin-message from our friend to the U.S. officials he spoke with was "Don't Let the Russians Steal Ukraine From the West Cause it has Geopolitical and Strategic Value, and Don't Let One Legal Case Prevent Ukraine From Deeper European Integration."
2. Although protocol prevented the U subject from being inserted inside the more formal discussion at the [REDACTED] [REDACTED] was very pleased and called "very successful" his conversations on U with [REDACTED] with Senators and Congressmen (names to come) and with [REDACTED] who he sat next to at lunch.
3. "We had very good meetings with [REDACTED] and discussed many issues," said [REDACTED] who added that "during the lunch I had a long talk about U with the [REDACTED] and I made the points about not allowing this Tymoshenko case to damage the very valuable strategic and geopolitical of from getting U closer to Europe than to Russia. [REDACTED] took detailed notes of what I was telling him, and seemed to agree with me on this."
4. "I had a very good talk with [REDACTED] and we discussed how valuable U is for our regional security, and how wrong it would be to try and isolate this country because of one issue, and [REDACTED] said to me "I absolutely agree. You are right." And we talked about what could be achieved through "engagement rather than isolation" and again he told me he fully agreed.."
5. Since [REDACTED] was rushing, but will be in NY today (Friday) we agreed to speak again today, so happy to go over more details with him.

[REDACTED]

# **EXHIBIT 910**

Black, Manafort, Stone and Kelly  
Public Affairs Company  
Registration #3600  
Section 5 Inspection  
July ~~1986~~ 1986  
August, 1986  
September, 1986

GOVERNMENT  
EXHIBIT

U.S. v. MANAFORT, 1:17-cr-201 (A.B.J.)

910



## Memorandum



Subject  
 Black, Manafort, Stone & Kelly,  
 Public Affairs Company  
 Registration No. 3600  
 Section 5 Inspection

Date  
 JEC:JB:HHH:ELP:TAR:djs  
 149-139-16  
 Typed: 12/3/86

To

From

TAR  
 SM

During the months of July, August and September, 1986 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] conducted a Section 5 inspection of the Black Manafort and Stone registrations pursuant to the Foreign Agents Registration Act of 1938, as amended (hereinafter referred to as FARA or the Act). These inspections included four registrations; Black, Manafort and Stone, Inc. (#3415), Black, Manafort, Stone & Kelly Public Affairs Company (#3600), Paul J. Manafort (#3594), and Black, Manafort, Stone & Atwater, Inc. (#3710).

This inspection report concerns itself with Black, Manafort, Stone & Kelly Public Affairs Company (#3600) (hereinafter referred to as BMSKPA). The inspection was conducted in order to verify that adequate disclosure has been made by the registrant pursuant to the disclosure requirements of FARA.

✓CHRONO



- 2 -

BMSKPA is a public relations company which provides general public affairs and legislative counsel to its clients. BMSKPA initially registered under FARA on June 14, 1984 and at the present time it remains an active registration. The following list indicates the various foreign principals for which BMSKPA has been registered and is currently registered:

	Registered	Terminated
1) The News Corporation, Ltd.	June 14, 1984	May 30, 1985 2)
Government of the Bahamas	April 9, 1985	Active
3) Government of Barbados	May 6, 1985	May 13, 1985
4) Government of St. Lucia	May 6, 1985	December 18, 1985
5) Government of the Dominican Republic	May 6, 1985	July 3, 1986
6) Government of Peru	September 16, 1985	June 30, 1986
7) UNITA	October 16, 1985	Active
8) Government of Nigeria	October 30, 1985	Active
9) Chamber of Philippine Manufacturers, Exporters and Tourism Association	November 25, 1985	February 24, 1986
10) Institute for Financial and Fiscal Studies of Curacao	April 18, 1986	Active

INSPECTION

The inspection consisted of a review of the correspondence, office memoranda and financial records of the registrant and it encompassed the period of June 14, 1984 to the present. A review of the material revealed several deficiencies which must be amended, as well as many questions, some of which were resolved in the meetings of September 9, 1986 and September 12, 1986 between the inspection team and [REDACTED]

AUSTRALIA

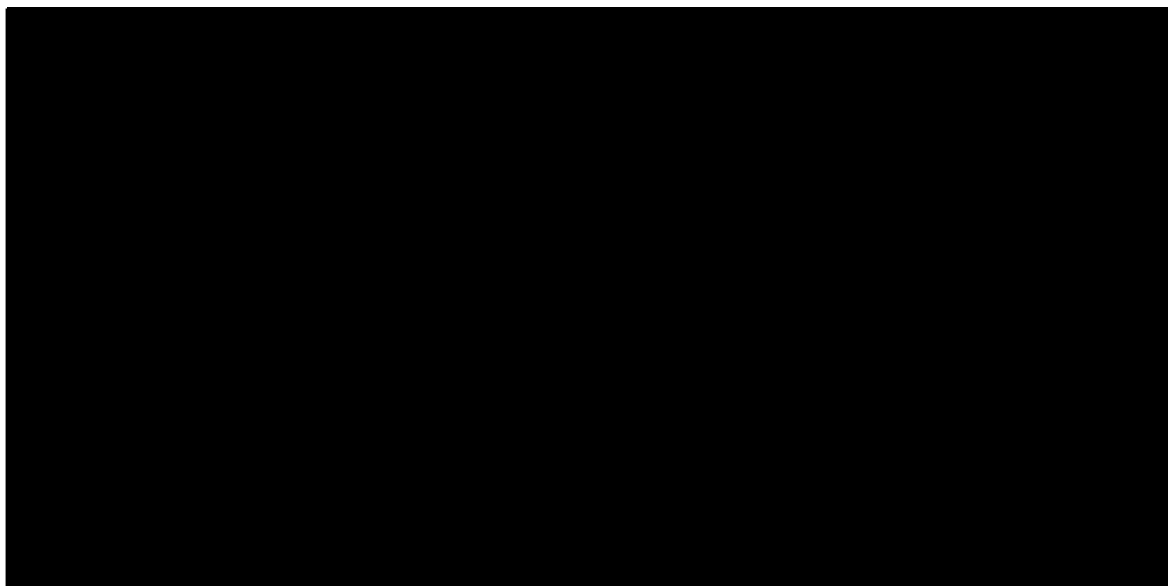
(NEWS CORPORATION LIMITED)

A letter dated April 26, 1984 to [REDACTED]  
[REDACTED] from Charlie Black, proposed that the registrant would provide a plan and make arrangements for meetings and activities in Washington which would bring the foreign principal into contact with leaders of the Congress and the executive branch on a private basis, in order to increase their knowledge of [REDACTED] and his organization. This activity was not mentioned on the letter of agreement dated June 1, 1984 which was filed with the Exhibit B, nor was this activity reported on the supplemental statements for the periods ending December 14, 1984 and June 14, 1985.

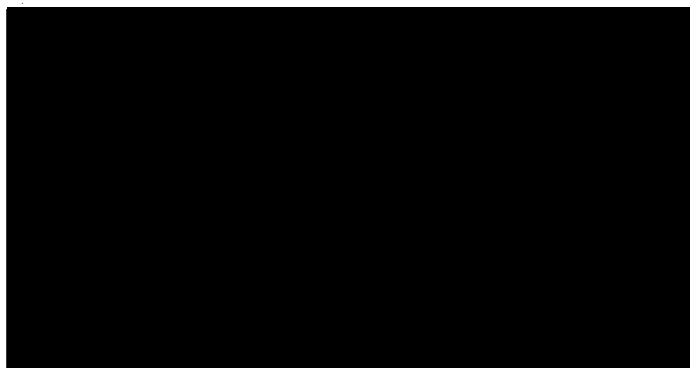
The following correspondence to [REDACTED] from Charles Black, Roger Stone and [REDACTED] indicates that the registrant planned for meetings and activities in Washington, D.C. which would bring the foreign principal into contact with U.S. Government officials.

1- A letter dated July 2, 1984 to [REDACTED] from Charlie Black, proposed meetings between [REDACTED] and [REDACTED] [REDACTED] (to schedule the meetings they weren't able to do on June 28).

2- A memorandum dated May 23, 1984 to [REDACTED] from Charlie Black and Roger Stone stated "Suggested Washington Opinion Leaders for you to meet in social setting"



"Suggested Reporters for you to meet in a social setting"



[REDACTED]

3- A memorandum dated December 3, 1984 to Charlie Black and [REDACTED]  
[REDACTED] from Roger Stone regarding status of [REDACTED] assignments  
stated "[REDACTED] will visit Washington January 18, 19, 20, 21 and 22,  
1984. We should attempt to set up meetings as follows:

[REDACTED]

4- A memorandum dated March 11, 1985 to [REDACTED] from Charlie  
Black, Roger Stone and [REDACTED] regarding update on  
communications issues stated "We are very anxious to get a day of your  
time . . . . to schedule more meetings with leaders in Washington.

[REDACTED]

5- A memorandum dated April 15, 1985 to [REDACTED] from Charlie Black, Roger Stone and [REDACTED] regarding update on communications legislative activity stated "We are also anxious to get a date on your schedule to arrange another round of meetings in Washington."

If the registrant did arrange for the foreign principal to meet with U.S. Government officials, and if they accompanied the foreign principal to the meetings which they arranged, the response to Item 12 of the supplemental statements for the periods ending December 14, 1984 and June 14, 1985 should be amended to report such activity. (We were advised during our meeting on September 30, 1986 with [REDACTED] that only two meetings with U.S. Government officials actually took place. The registrant's participation in the meetings involved only introductions. [REDACTED] explained that the proposed meetings with the foreign principal did not take place because Rupert Murdoch was very hard to contact.)

#### BAHAMAS

1- A memorandum dated August 8, 1985 to [REDACTED] from Roger Stone and [REDACTED] regarding Managing Information for Positive Press Stories stated "Our involvement will be to collect, assimilate and make useable materials that the Government of the Bahamas provides to the "right" press individuals." If BMSKPA provided materials to press individuals, its response to Items 11 and/or 12 of the June 14, 1986 supplemental statement should be amended to report this activity.

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2- A memorandum dated October 4, 1985 to [REDACTED] from Roger Stone and [REDACTED], regarding Press Strategy for the Commonwealth Conference October 16-22, 1985 stated "Structure a press interview schedule for the [REDACTED] and [REDACTED] Bahamian officials . . . . Conduct informal meetings with press to explain key Bahamian issues." If BMSKPA conducted meetings with the press to explain key Bahamian issues, its response to Item 11 of the December 14, 1985 supplemental statement should be amended to report this activity. [REDACTED] indicated during our 9/30/86 meeting that BMS&K did not conduct informal meetings with the press.)

3- If BMSKPA prepared or disseminated the press release dated November 13, 1985 entitled "Narcotics Control in the Americas", regarding November 20-22, 1985 First International Drug Symposium hosted by the Commonwealth of the Bahamas in Nassau, its response to Item 11 and/or Item 12 of the December 14, 1985 supplemental statement should be amended to report this activity. Dissemination report(s) should also be filed, if appropriate.

4- A memorandum dated November 19, 1985 to [REDACTED] from P. Manafort and [REDACTED] regarding U.S. Press Coverage of the First International Drug Symposium (11/20-22, 1985) indicated BMSKPA instituted a media plan involving the production of a press package and the dissemination of this material to selected U.S. media. If BMSKPA produced and disseminated the press package, its response to Item 11 of the December 14, 1985 supplemental statement should be

amended to report this activity. Dissemination report(s) should also be filed, if appropriate. [REDACTED] indicated during our 9/30/86 meeting that BMSKPA was involved in this activity.)

5- A memorandum dated December 30, 1985 from [REDACTED] to [REDACTED] regarding Public Relations Strategy stated "BMSKPA will work with the government of the Bahamas to prepare and disseminate information concerning the Bahamas-Haiti Repatriation Treaty. Our plan is to alert the U.S. press and U.S. government to the Bahamian position and plan of action . . . . We will prepare two separate information packets: one for the U.S. press and one for the U.S. government . . . . materials to be disseminated to the press from a central contact point in the Bahamian government and that the government packets be distributed by [REDACTED] [REDACTED] If BMSKPA prepared and/or disseminated this information, its response to Item 11 and/or 12 of the June 14, 1986 supplemental statement should be amended to report this activity. Dissemination report(s) should also be filed, if appropriate.

6- A memorandum dated January 27, 1986 to [REDACTED] regarding Public Relations Strategy Bahamas - Haitian Repatriation stated "Black, Manafort, Stone and Kelly would work with BIS [Bahamas Information Service] to prepare the press release and press kits . . . . we would work with BIS to invite and recruit the Bahamian and Florida-based journalists . . . . to continue to relay the Bahamian perspective to the U.S. public we would work with BIS to identify and screen media teams for visits to the Bahamas." If BMSKPA prepared the

press release and press kits and identified and screened media teams for visits to the Bahamas, its response to Item 11 of the June 14, 1986 supplemental statement should be amended to report such activities. [REDACTED] indicated during our meeting on September 30, 1986 that BMSKPA did not engage in this activity, BIS did.)

7- A memorandum dated February 13, 1986 to [REDACTED] from [REDACTED] regarding Public Relations Strategy - Bahamas-Haitian Repatriation stated "We are presently working with [REDACTED] to ensure the Bahamian position is understood on the Aerostat Balloon. In this regard, we are drafting a statement to be entered in the Congressional Record of the February 6 Hearing of the House Subcommittee on Government Information Justice and Agriculture, which has legislative jurisdiction over the Aerostat Balloon . . . . . We are also working with [REDACTED] to prepare a statement for the Caribbean Basin Initiative Oversight Hearing this month." If BMSKPA drafted these statements, its response to Item 12 of the June 14, 1986 supplemental statement should be amended to report these activities. [REDACTED] indicated during our September 30, 1986 meeting that BMSKPA did not draft statements to be entered in the Congressional Record.)

8- A memorandum dated February 13, 1986 to [REDACTED] from [REDACTED] regarding Public Relations Strategy, Bahamas-Haitian Repatriation stated "Last month with the help of [REDACTED] [REDACTED] we arranged for Channel 7 of Miami, an NBC affiliate, to



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visit the Bahamas. We understand the trip was a most productive one. The news special will be aired in March . . . . . a national network news program called [REDACTED] plans to visit Haiti within the next few weeks. We have discussed with them the possibility of detouring to the Bahamas . . . . If approved, Black, Manafort Stone & Kelly would work with [REDACTED] to craft the documentary". If BMSKPA arranged for Channel 7 of Miami to visit the Bahamas and arranged for [REDACTED] to craft a documentary concerning the Bahamas, its response to Item 11 of the June 14, 1986 supplemental statement should be amended to report these activities. [REDACTED] indicated during our meeting on September 30, 1986 that Channel 7 inquiries were referred to [REDACTED] and [REDACTED] documentary never happened.)

9- A memorandum dated February 21, 1986 to [REDACTED] from BMSKPA regarding Activity Update - Legislative strategy targeted at the key subcommittees with oversight of Bahamian programs stated "We drafted a statement to be entered into the Congressional Records of the House Government Operations Subcommittee on Information that explains the Bahamian position on the second aerostat. We plan to meet with members of the committee next month and provide them with additional statistical information which emphasizes the value of a second and third aerostat . . . . We are presently working with [REDACTED] [REDACTED] to prepare a statement that will define the Bahamas' position and the need to allow compromise depending upon the internal realities of each beneficiary nation . . . . . " If BMSKPA drafted these statements and provided the members of

the committee with information, its response to Item 12 of the June 14, 1986 supplemental statement should be amended to report these activities.

10- A memorandum dated March 3, 1986 to [REDACTED] from P. Manafort, [REDACTED] [REDACTED] regarding Bahamas-Haitian Repatriation Treaty stated "Black, Manafort, Stone & Kelly is presently working with the Ministry of National Security Affairs to craft a statement for local TV and radio. The statement will explain the Government's legal rights and obligations to enforce the Treaty . . . . Proceeding the announcement, Black, Manafort, Stone & Kelly will schedule carefully screened U.S. media teams to visit the Bahamas. We will arrange for the U.S. journalists to meet with both [REDACTED] [REDACTED] If BMSKPA drafted the statement for TV and radio, scheduled U.S. media teams to visit the Bahamas and meet with Bahamian Government officials, its response to Item 11 of the June 14, 1986 supplemental statement should be amended to report these activities. [REDACTED] indicated during our September 30, 1986 meeting that Bahamas Information Office engaged in this activity.)

11- A memorandum dated March 3, 1986 to [REDACTED] from P. Manafort, [REDACTED] [REDACTED] also stated " . . . will ensure that the needs, efforts and accomplishments of the [REDACTED] do not go unnoticed with the U.S. Government . . . . One tactic we have begun to employ is submitting official policy statements into the U.S. Congressional Record as with the aerostat balloon. . . . . Our

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first step will be to enter the position of the Bahamas into the Congressional Records of the CBI hearings of the House Ways and Means Oversight Subcommittee." If BMSKPA submitted official policy statements into the U.S. Congressional Record, its response to Item 12 of the June 14, 1986 supplemental statement should be amended to report this activity.

12- A memorandum dated March 19, 1986 to [REDACTED] from Paul Manafort and [REDACTED] stated " . . . . We are currently securing approval from the Times to prepare a piece for the commentary section of the paper. The piece will detail the efforts of the Bahamas in narcotics interdictions and control, and emphasize the cooperative activity between the U.S. and the Bahamas. . . . Black, Manafort, Stone & Kelly worked with [REDACTED] to draft the letter [letter to the [REDACTED] and to place it on the [REDACTED] [REDACTED] If BMSKPA prepared the piece for the commentary section of the [REDACTED] and drafted [REDACTED] letter to the [REDACTED] its response to Item 11 of th June 14, 1986 supplemental statement should be amended to report these activities.

13- A memorandum dated March 24, 1986 to [REDACTED] from P. Manafort and [REDACTED] regarding visit April 14-16, 1986 stated "To prompt such a declaration, [declaration of the Bahamas as North American Territory for the purpose of convention tax deductibility] we would arrange meetings for yourself with [REDACTED] [REDACTED]

[REDACTED] If these meetings were arranged, the registrant's response to Item 12 of the June 14, 1986 supplemental statement should be amended to report such activity.

14- A memorandum dated March 24, 1986 to [REDACTED] from Manafort and [REDACTED] regarding Haitian Repatriation stated "This document was sent to pertinent U.S. Government officials in both the Executive and Legislative branches to brief them on the Bahamian position. Specific constituencies targeted include [REDACTED] [REDACTED] U.S. Customs, State Department, Department of Immigration, and the White House. Enclosure: "Illegal Immigrants in the Bahamas". If the registrant disseminated this document, its response to Item 12 of the June 14, 1986 supplemental statement should be amended to report such activity and a dissemination report should be filed.

15- A memorandum dated March 27, 1986 to P. Manafort from [REDACTED] regarding recent activity in the Bahamas account stated ". . . [REDACTED] and I have arranged for [REDACTED] to invite the [REDACTED] to Washington." If BMSKPA arranged for [REDACTED] [REDACTED] to invite [REDACTED] to Washington, its response to Item 12 of the June 14, 1986 supplemental statement should be amended to report this activity.

16- A memorandum dated April 9, 1986 to P. Manafort from [REDACTED] [REDACTED] regarding Talking Points for call to Bahamas stated "Black, Manafort, Stone & Kelly has arranged a special congressional hearing

to provide the Bahamas with the opportunity to demonstrate its interest in continuing and improving joint U.S./Bahamian drug interdiction programs." (Although activities mentioned in notations 15 and 16 above are not specifically reported in Items 11 and 12 of the June 14, 1986 supplemental statement, these activities appear to be connected to contacts with [REDACTED]

[REDACTED], which are reported in Item 12.) If BMSKPA engaged in activities to arrange the congressional hearing, its response to Item 12 of the June 14, 1986 supplemental statement should be amended to report such activities.

17- A letter dated April 11, 1986 to [REDACTED]  
[REDACTED] references a meeting regarding possibility of getting the [REDACTED] more involved with the joint U.S./Bahamian drug interdiction program, encloses background piece, and legislative update regarding funding for the aerostat balloon program. (A letter dated April 29, 1986 was reported being sent to [REDACTED] however, this contact does not appear to have been reported.) If BMSKPA contacted [REDACTED] by letter dated April 11, 1986, its response to Item 12 of the June 14, 1986 supplemental statement should be amended to report this activity.

18- A memorandum dated May 19, 1986 to Paul from [REDACTED] regarding Status of Aerostat Legislation stated ". . . . In preparation for your meeting with [REDACTED] this evening, you should be aware of the status of the potential legislative vehicles for the aerostat." If this meeting took place, the registrant's response to Item 12 of

the June 14, 1986 supplemental statement should be amended to report this activity.

19- A "Dear Colleague" letter dated June 6, 1986 from [REDACTED] [REDACTED] attached a draft letter to House and Senate Appropriations and Armed Services Committees (Chairmen and ranking minority members on each). If the registrant drafted this letter, the registrant's response to Item 12 of th June 14, 1986 supplemental statement should be amended to report such activity.

20- A memorandum dated June 11, 1986 to [REDACTED] from BMSKPA regarding National Security Directive stated "We plan to travel to the Bahamas the second week in July to discuss with you and your Administration the status of our Washington initiatives. During this same time period, we will be accompanied by the key Congressional staffers who are overseeing the Bahamas' programs in the Congress."

21- A memorandum dated June 17, 1986 to [REDACTED] from [REDACTED] [REDACTED] regarding Visit to Nassau stated "Black, Manafort, Stone & Kelly will be accompanied by congressional delegation comprised of key House and Senate staff members who oversee Bahamas Programs in Congress -

[REDACTED]

[REDACTED]

If the registrant arranged for the trip of these key House and Senate staff members, its response to Item 12 of the June 14, 1986 supplemental statement should be amended to report such activity.

22- In the supplemental statement for the period ending June 14, 1986 and the dissemination report filed on June 11, 1986, it was reported that on June 10, 1986 the registrant sent a typed statement regarding compromise on drug interdiction air wing, and three newspaper articles regarding drug trafficking and drug interdiction to four public officials. The registrant should amend its response to Item 12 of the supplemental statement to disclose the names and titles of the public officials who were sent the above referenced materials.

BARBADOS

BMSKPA adequately disclosed the activities it engaged in on behalf of the Government of Barbados. No amendments are required to be filed for this foreign principal.

CURACAO

BMSKPA must provide this Unit with an explanation as to why [REDACTED]

[REDACTED] did not file a timely short form registration statement.

The BMSKPA supplemental statement for the period ending June 14, 1986 shows [REDACTED] working directly on behalf of the foreign principal on April 10, 1986 however, a short form registration statement was not filed until July 29, 1986.

2- A April 18, 1986 note stating "[A]ttached is a draft of the proposed committee report language in connection with the branch profits tax, as we discussed. I am simultaneously giving this to [REDACTED] [REDACTED] for any comments or suggestions they may have. . . ." BMSKPA must disclose in item 12 its role in the committee report language regarding no treaty override for branch profits tax in its supplemental statement for the period ending June 14, 1986.

3- April 24, 1986 letters from [REDACTED] with attachments regarding the tax bill were sent to [REDACTED]  
[REDACTED] BMSKPA must report this on its supplemental statement for the period ending June 14, 1986. Furthermore, rather than a Section 4(e) label, this material should have had a Section 4(b) label and dissemination reports should have been filed with this Unit along with two copies of the material if it was disseminated.

4- A June 4, 1986 letter to [REDACTED] staff from [REDACTED] stated [e]nclosed is the material concerning the Treaty Override Provisions of the Senate Finance Committee Bill and the interests of our client. . . ." This contact should be reported



in BMSKPA's supplemental statement for the period ending June 14, 1986.

DOMINICAN REPUBLIC

1- The following correspondence between the registrant and the foreign principal indicates that the registrant's services to the foreign principal may have included the drafting of letters to be sent to U.S. Government officials by the foreign principal, and also the drafting of letters for U.S. Government officials to send to other U.S. Government officials concerning matters of interest to the foreign principal.

(a) A letter dated May 23, 1985 was sent to [REDACTED] from [REDACTED] regarding the draft of a letter to [REDACTED] concerning the Dominican sugar proposal.

(b) A letter dated September 17, 1985 to [REDACTED] [REDACTED] stated "I will prepare a draft letter for your signature." [REDACTED] and [REDACTED] expressing support for retaining 18% loan levels.)

(c) A letter dated October 22, 1985 to [REDACTED] [REDACTED] [REDACTED] stated "I have enclosed for your review a suggested draft letter which

[REDACTED]

[REDACTED] may wish to send to [REDACTED] and

[REDACTED] The draft letter was regarding possessions tax credit (IRC Sec. 936) urging the committee to give consideration to adoption of a complimentary proposal that would allow presently idle funds on deposit in Puerto Rico financial institutions to be loaned for new investment and trade related purposes in the Caribbean region.

- d) an undated (possibly October 31, 1985) draft letter to [REDACTED] extended an invitation to visit the Dominican Republic in the fall of 1985 or early 1986.
- e) Dear Colleague letter dated October 15, 1985, regarding sugar quota allocations.
- f) Undated draft letter to Mr. Chairman and Mr. Secretary from the Ambassadors of Caribbean countries to the U.S. concerning tax policy question of Sec. 936 of the U.S. Internal Revenue Code.

The registrant should amend its response to Item 11 and/or 12 of the supplemental statement for the period ending December 14, 1985 to report that they assisted the Government of the Dominican Republic in

its efforts to obtain additional foreign aid assistance by drafting letters to be sent to U.S. Government officials by the foreign principal, and by drafting letters for U.S. Government officials to send to other U.S. Government officials.

2- The following correspondence between the registrant and the foreign principal indicates that the registrant's services to the foreign principal included the following contact with a U.S. Government official which does not appear to have been reported.

a- A letter dated September 17, 1985 to [REDACTED] [REDACTED] stated "I had a conversation today with [REDACTED] [REDACTED] is extremely concerned about the amendment on sugar that will be offered by [REDACTED] If the registrant contacted this U.S. Government official, its response to Item 12 of the supplemental statement for the period ending December 14, 1985 should be amended to report the contact with [REDACTED] on September 17, 1985.

NIGERIA

1 - BMSKPA must disclose their role in the October 23, 1985 letter to [REDACTED]  
[REDACTED]

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This should be disclosed in item 12 of the supplemental statement for the period ending December 14, 1985.

2 - An October 29, 1985 memorandum to [REDACTED] [REDACTED] does not have a short-form registration statement on file in the BMSKPA (#3600) registration, but [REDACTED] indicated that [REDACTED] had nothing at all to do with the memorandum even though his name appeared on it. This memorandum constitutes political activity and thus [REDACTED] should have a short form under this particular registration.

3 - A November 1, 1985 memorandum to [REDACTED] indicated that BMSKPA possibly engaged [REDACTED] as a consultant to assist them in connection with their representation of the Government of Nigeria. A Nov. 12, 1985 memorandum suggests that [REDACTED] did work and possibly is working on behalf of Nigeria and therefore should be registered under the Act. According to [REDACTED] and [REDACTED] arranged initial contact, but did nothing else. He only arranged to establish the contract.

4 - A November 11, 1985 memorandum to [REDACTED] from [REDACTED] indicated the following

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meetings/activities which should be reported in the December 14, 1985 supplemental statement.

a) [REDACTED] met with [REDACTED]  
[REDACTED] on October 29 to discuss the Nigerian Peace Initiative, as well as P.L. 480 and the grant/purchase of wheat. The memorandum also stated that [REDACTED] have continued their contacts with [REDACTED]. All such contacts should be reported in item 12 of the statement.

b) [REDACTED]  
[REDACTED] on the floor of the U.S. Senate" on October 30, 1985. This contact as well as the subject matter should be disclosed in item 12 of the statement.

c) Meeting between [REDACTED]  
[REDACTED]  
[REDACTED] on October 31, 1985. Although the [REDACTED] contact was disclosed, BMSKPA should also have disclosed the contact with Pitchford in item 12 of the statement.

d) [REDACTED] are now working on efforts to attract U.S. business investment in Nigeria."

This activity should be disclosed in item 11 of the statement and all political activity in connection with promoting investment to Nigeria should be disclosed in item 12.

5 - A December 13, 1985 letter to [REDACTED] from Paul Manafort indicated that [REDACTED] and Manafort had discussed the possibility of Audifferen acting as a consultant with respect to Nigeria. Also, a December 20, 1985 letter to Manafort from [REDACTED] indicated that [REDACTED] is definitely somehow involved with Nigeria. According to [REDACTED] nothing in the letter occurred and no agreement was ever signed.

6- BMSKPA must disclose its role in the visit of [REDACTED] [REDACTED] to the U.S.

PERU

1 - An August 13, 1985 memorandum indicated that as of August 6, 1985 the Government of Peru was a client of BMSKPA. BMSKPA registered for Peru on September 16, 1985, over 30 days after Peru became their client. BMSKPA should provide this Unit, in writing, with an explanation as to why it violated the statute.

2 - An August 14, 1985 memorandum to [REDACTED] from Paul Manafort and [REDACTED] suggested that BMSKPA had discussions with Agency for International Development officials on behalf of Peru regarding Peru's outstanding arrearage problem. This activity/discussions must be disclosed in item 12 of the supplemental statement for the period ending December 14, 1985.

3 - An August 14, 1985 memorandum of conversation from [REDACTED] [REDACTED] indicated that he had a meeting with [REDACTED] [REDACTED] This meeting was not disclosed in BMSKPA's December 14, 1985 supplemental statement. BMSKPA must disclose the contact as well as the nature and purpose of the contact in item 12 of the statement. (according to [REDACTED] [REDACTED] this meeting did occur).

4 - An August 15, 1985 memorandum to [REDACTED] from Paul Manafort and [REDACTED] indicated that [REDACTED] [REDACTED] may be invited to visit Peru. If the visit took place, and BMSKPA had a role in the visit then BMSKPA must disclose its role in the visit in item 12 of the supplemental statement for the period ending December 14, 1986. According to [REDACTED] this visit did occur, but BMSKPA did not have a role in the visit.

5 - A September 5, 1985 memorandum to [REDACTED] from Paul Manafort referred to key U.S. Government officials, members of

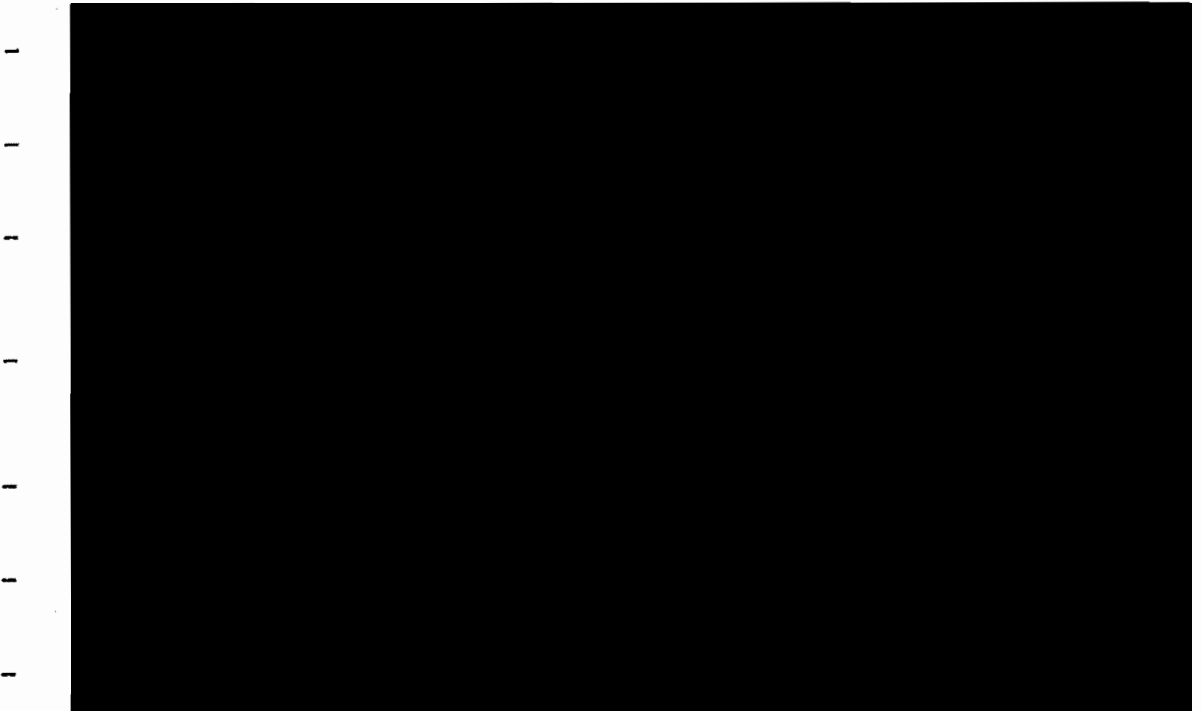
- 25 -

Congress, and media markets, to be contacted by the Peruvian Embassy or by BMSKPA. The following contacts/persons referred to in the memorandum were not disclosed in BMSKPA's supplemental statement for the periods ending December 14, 1985 and June 14, 1986, however [REDACTED] indicated that BMSKPA only suggested that these individuals be contacted and that the Embassy of Peru scheduled the meetings.

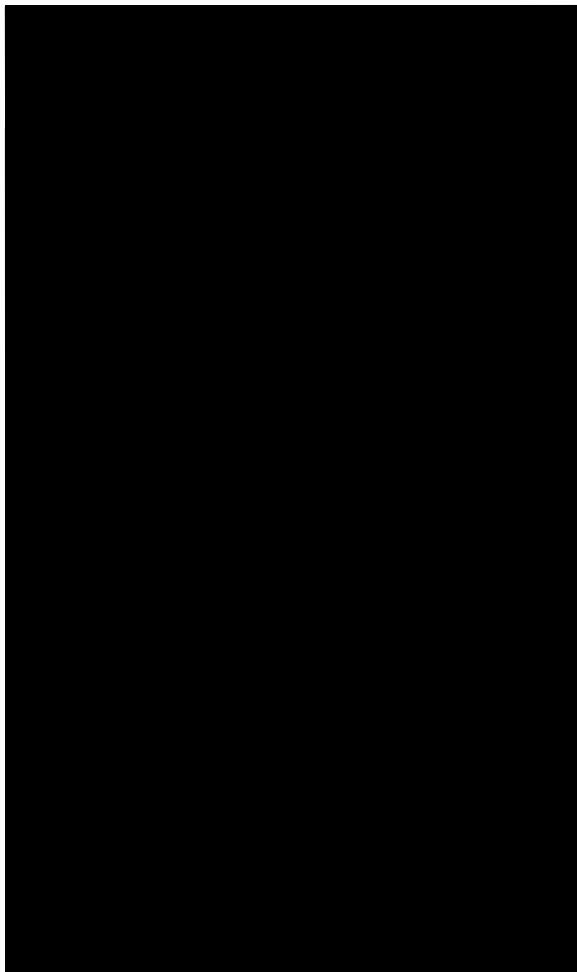
- U.S. Government officials

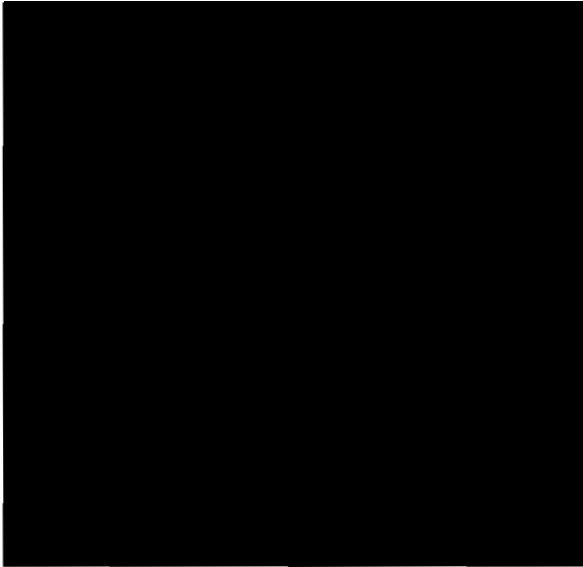
1. *Journal of the American Medical Association*, 281: 2369-2374, 1999.



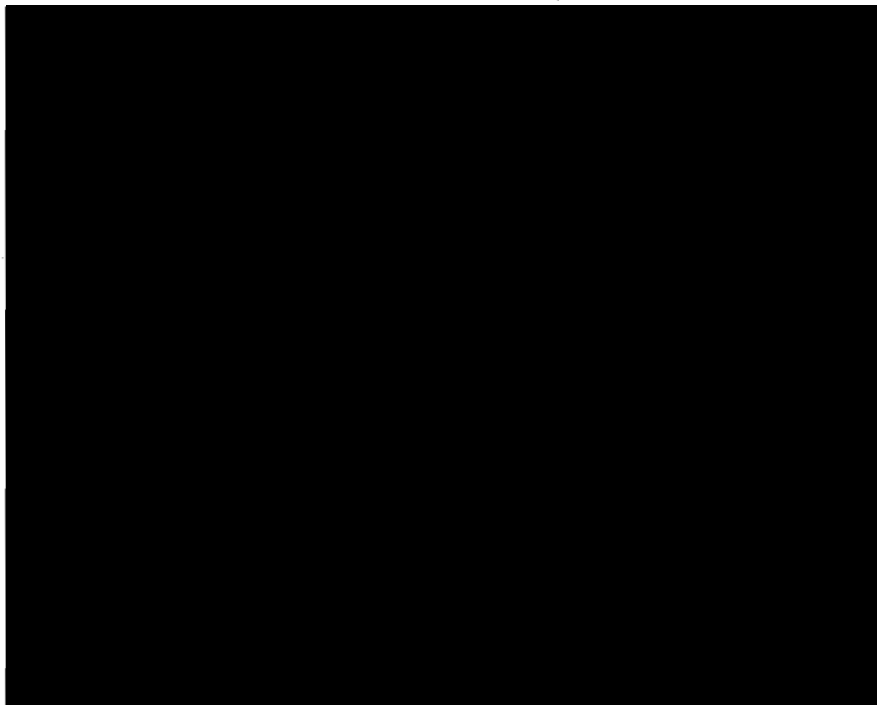


U.S. Congressmen





Media Markets



6 - BMSKPA must disclose its role in [REDACTED] United Nations visit referred to in a September 17, 1985 memorandum to [REDACTED]. This activity should be disclosed in item 11 and/or 12 of the December 14, 1985 supplemental statement. (The visit was also referred to in other memoranda).

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7 - BMSKPA must disclose its role in the U.S. visit by [REDACTED] referred to in a September 18, 1985 memorandum to [REDACTED] from Paul Manafort and [REDACTED] in items 11 and/or 12 of BMSKPA's supplemental statement for the period ending December 14, 1985.

8 - A September 24, 1985 memorandum to [REDACTED] from Paul Manafort regarding the activities of BMSKPA on behalf of Peru revealed the following activities which BMSKPA must disclose in items 11 and 12 of its December 14, 1985 supplemental statement.

a) Facilitated and accelerated the creation of a payment schedule by the United States Government of the obligations of Peru. (item 11)

b) Stopped the reprogramming of \$4.5 million of U.S. assistance to Peru during FY 1985. (item 11)

c) Contacted the major press mediums to give them background information. (item 12)

d) Developed talking points and important themes for the press conferences and press interviews (item 12 disclose activity and list contacts)

e) Maintained continued contact with the press.

- f) Organized private interviews with the Cable News Network, USA Today, The Los Angeles Times, Newsweek, SIN, and The Washington Post. (item 12)
- g) Notified 25 members of the priority press to ensure that they were present during the press conference (list in item 12).
- h) Organized the visit of [REDACTED]  
[REDACTED]  
(item 12).
- i) Worked with the Department of State and the Department of Defense to ensure defense funding for the education of the military. All such contacts should be reported.  
(item 12)

9 - A September 26, 1985 memorandum to [REDACTED]  
[REDACTED] from Manafort, [REDACTED] discussed the September 22 and 23 press interviews with Newsweek, The Washington Post, The Los Angeles Times, U.S.A. Today, CNN, SIN. BMSKPA must indicate its role in these interviews in item 12 of the December 14, 1985 supplemental statement.

10 - A September 27, 1985 memorandum to Paul Manafort from [REDACTED] stated "[a]ttached is a summary of the [REDACTED] speech, an accompanying cover letter for

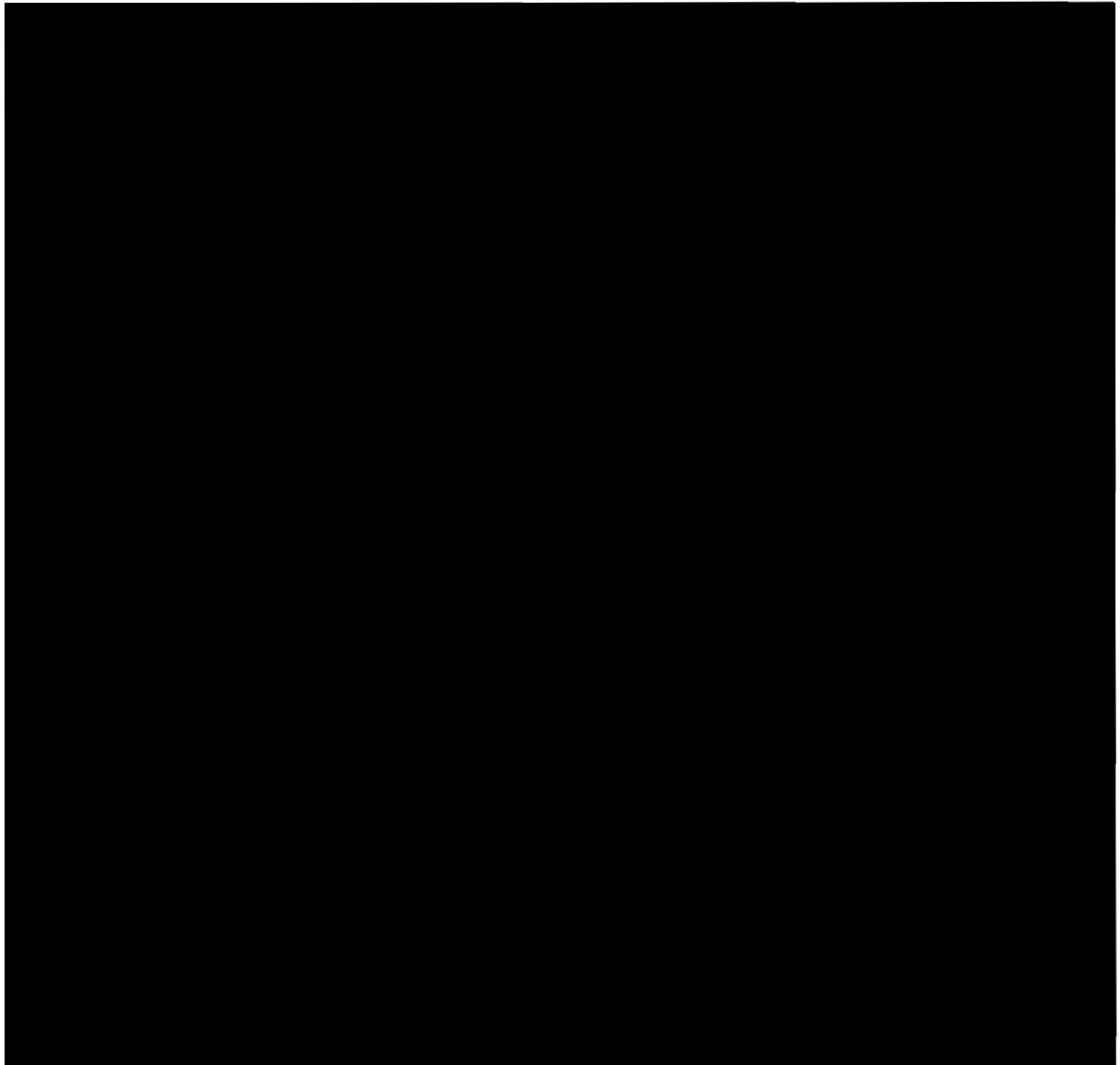
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[REDACTED] signature, and a list of key U.S. Government officials who are to receive this summary." BMSKPA must report their role in the [REDACTED] speech in item 11 of the supplemental statement for the period ending December 14, 1985. Furthermore, BMSKPA did not indicate that they disseminated any printed material on behalf of Peru. BMSKPA must provide this Unit with a copy of this material. If the material is considered political propaganda BMSKPA must file a dissemination report and disclose the activity and the names of the U.S. Government officials who received the disseminated material in item 12 of the statement and BMSKPA must also amend items 16-24 of the statement if indeed the material is considered political propaganda.

11 - An October 2, 1985 memorandum to [REDACTED] from Manafort and [REDACTED] stated that BMSKPA had conversations with Treasury officials regarding the annual meeting of the World Bank and IMF in South Korea and the shift of emphasis of debtor nations from austerity to economic growth. BMSKPA neglected to disclose any conversations with Treasury officials. BMSKPA must disclose all such contacts in their supplemental statement for the period ending December 14, 1985. [REDACTED] indicated that [REDACTED] said he "doesn't recall any meetings or conversations.")

12 - An October 17, 1985 paper on the Peru Aviation Issue referred to seven key U.S. decision makers with respect to the issue of aviation. All contacts with the seven key decision

makers listed below should be disclosed in item 12 of the appropriate supplemental statement.



13 - A November 8, 1985 memorandum to [REDACTED] from Paul Manafort states that "Black, Manafort, Stone and Kelly, Inc. has communicated with [REDACTED] [REDACTED] This contact must be disclosed in item 12 of the December 14, 1985 supplemental statement.

14 - BMSKPA must disclose in item 11 of the December 14, 1985 supplemental statement, its role in the visit of [REDACTED] to the United Nations as described in the October 3, 1985 memorandum to [REDACTED] from Paul Manafort. The following activities should be indicated in the disclosure.

- a) Structured a press schedule.
- b) Prepared a list of talking points to be used by [REDACTED] as he briefed the press.
- c) Offered advice on content of press kit.
- d) Prepared press announcement.
- e) Prepared press release for distribution to priority press (This may be political propaganda. BMSKPA must provide this Unit with a copy of the release).
- f) Developed individually tailored press package for television journalist (May be political propaganda. This Unit must be given a copy of the press package).

- 33 -

g) Set up press interviews for [REDACTED] with Associated Press, Reuters, The Washington Post, Washington Times, and the Los Angeles Times.

h) BMSKPA's role in the meeting between [REDACTED]  
[REDACTED]

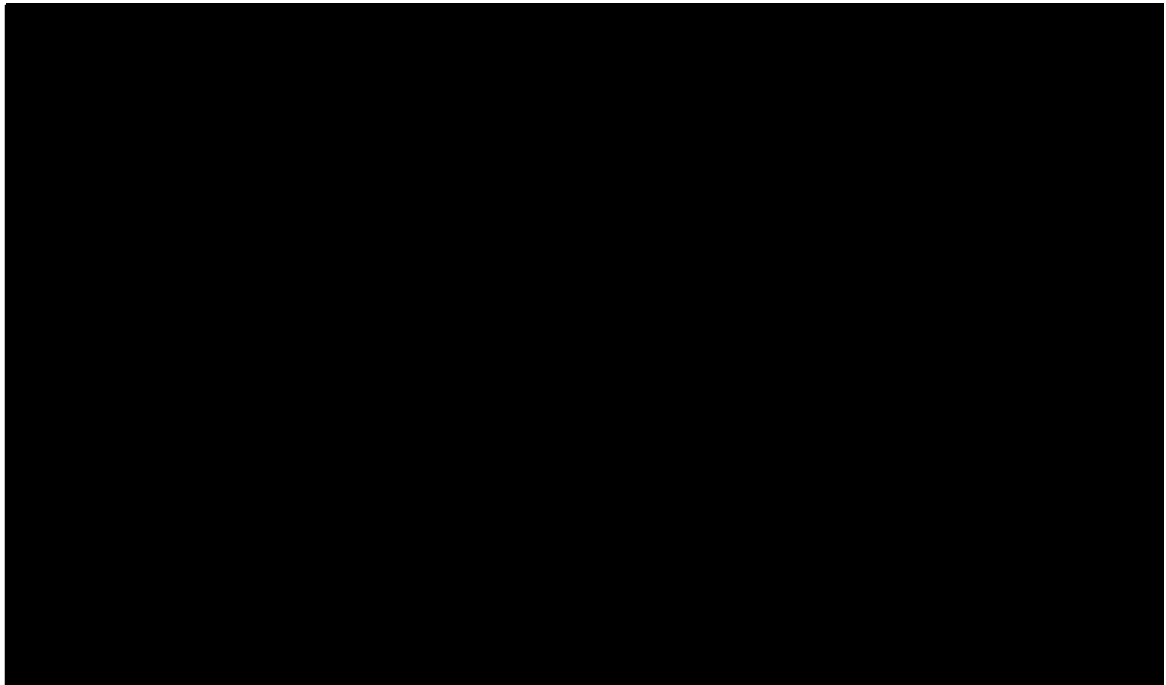
15 - A letter was sent to [REDACTED] and to [REDACTED] [REDACTED] with respect to the S.680 hearings before the Trade Subcommittee on September 12 and 13, 1985. Enclosed with the letters were six copies of comments on S.680. BMSKPA must indicate their role in the letter and comments in item 12 of the December 14, 1985 supplemental statement and also must provide this Unit with the the material if they disseminated it on behalf of Peru. Dissemination reports may also need to be filed.

16 - BMSKPA should disclose their role, if any, in the University of South Carolina Conference on Progress Towards Prosperity"

#### PHILIPPINES

1 - A November 18, 1985 memorandum to Paul Manafort from [REDACTED] mentioned the following activities which should have been reported in item 12 of the December 14, 1985 supplemental statement.





2 - A November 21, 1985 memorandum indicated that BMSKPA would prepare and distribute fact sheets and other information on the Philippines to Congress and the press.

[REDACTED] stated that BMSKPA did not distribute any material whatsoever on behalf of this foreign principal.

3 - A December 3, 1985 memorandum to [REDACTED] from Paul Manafort indicated that [REDACTED] would be interviewed by Time. According to [REDACTED]

[REDACTED] BMSKPA did not arrange or have any role in this or any interviews.

4 - A December 11, 1985 memorandum to Paul Manafort from [REDACTED] indicated that [REDACTED] made three calls on behalf of the foreign principal which should have been reported but

were not reported in item 12 of the December 14, 1985 supplemental statement. The calls were to [REDACTED]

[REDACTED]

[REDACTED]

In the December 14, 1985

supplemental statement BMSKPA indicated that they "advised the client with respect to U.S. media and press strategies with respect to the upcoming presidential election." This Unit found approximately 15 memoranda which indicated that BMSKPA advised the [REDACTED] with respect to U.S. media and press strategies rather than the Chamber of Philippine Manufacturers, Exporters and Tourism Association. December 2,3,4,5 and 13, 1985 and November 18, 20, 21, 22 and 25, 1985. BMSKPA must make general statements in item 11 of the December 14, 1985 and June 14, 1986 supplemental statements setting forth its role with respect to the Philippine election.

5 - An undated memorandum regarding "Upcoming Visit of U.S. Senators to Philippines" stated ". . . we have had discussions with [REDACTED] regarding those interested in visiting the Philippines." All contacts and activity surrounding these visits should be disclosed in items 11 and 12 of the supplemental statement for the period ending June 14, 1986.

6 - January 7, 1986 and December 31, 1985 memoranda indicated that U.S. journalists would visit Manila,

Philippines in January, 1986. The journalists who were to visit the Philippines were listed in the memoranda: [REDACTED]

[REDACTED] The December 31 memorandum indicated that BMSKPA arranged these trips, however, [REDACTED] indicated that BMSKPA had no role in arranging the visits. BMSKPA must disclose all of their activity/contacts in connection with these visits in item 12 of the supplemental statement for the period ending June 14, 1986 if they did indeed have a role in the visits.

7 - BMSKPA sent letters on January 7, 1986 to the U.S. media. They must report this activity and the contacts with the press in the supplemental statement for the period ending June 14, 1986.

8 - A January 8, 1986 memorandum indicated that BMSKPA met with [REDACTED] with respect to the Foreign Assistance Bill. This contact must be reported in item 12 of the June 14, 1986 supplemental statement. [REDACTED] indicated that this contact was reported however, in reviewing the file again this meeting was not disclosed on the June 14, 1986 supplemental statement.

9 - BMSKPA must indicate its role in the January 20, 1986 U.S. visit of Philippine [REDACTED]

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[REDACTED] in a telephone conversation with [REDACTED] of this Unit indicated that the following meetings were arranged by the Embassy and that BMSKPA only suggested that they occur:

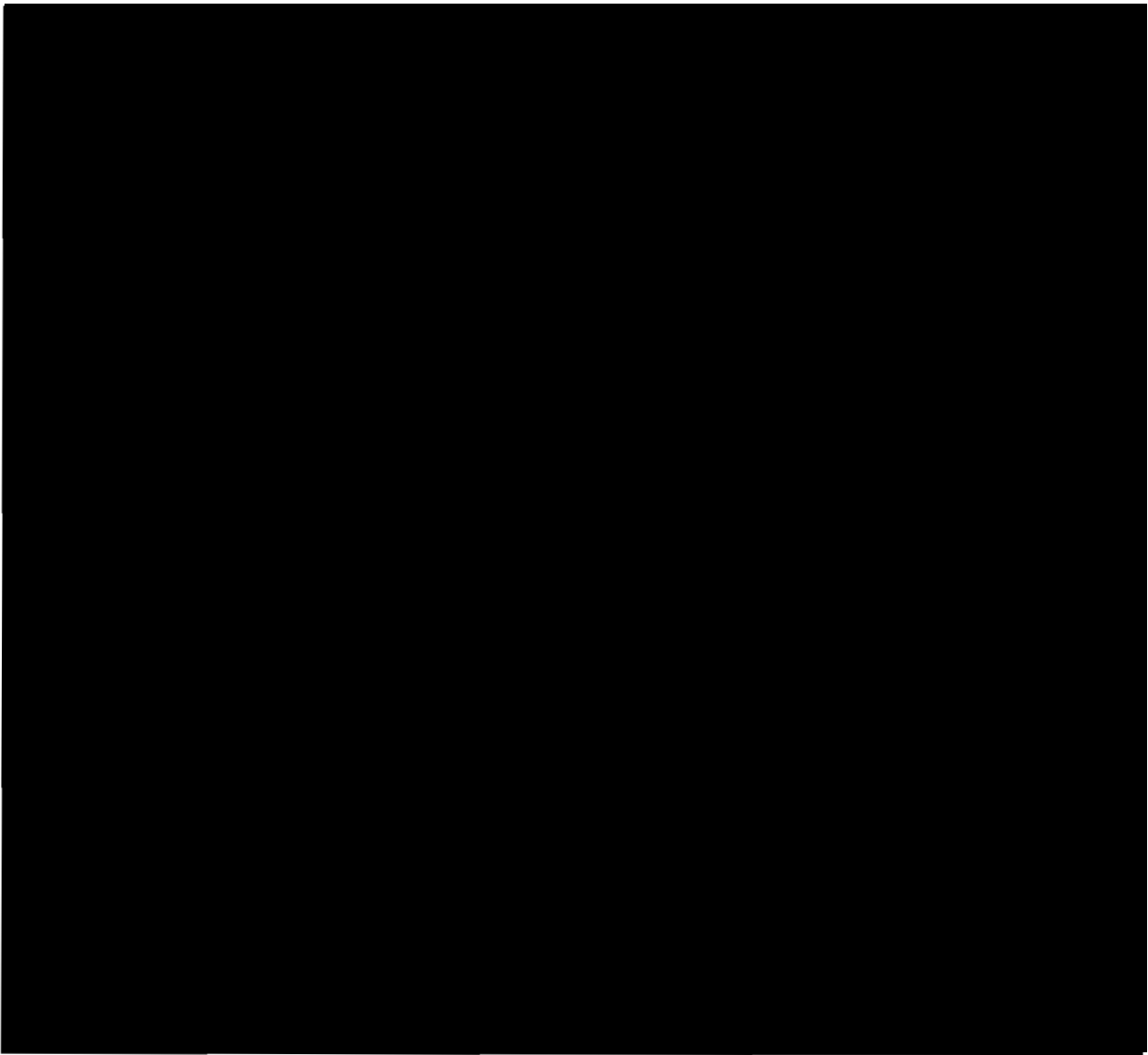
[REDACTED]

[REDACTED] All contacts that BMSKPA may have had with respect to these meetings (ex. Paul Manafort coordination of the [REDACTED] meeting) must be disclosed in item 12 of the supplemental statement for the period ending June 14, 1986.

10 - A January 20, 1986 memorandum as well as a schedule of activities indicated that the [REDACTED]

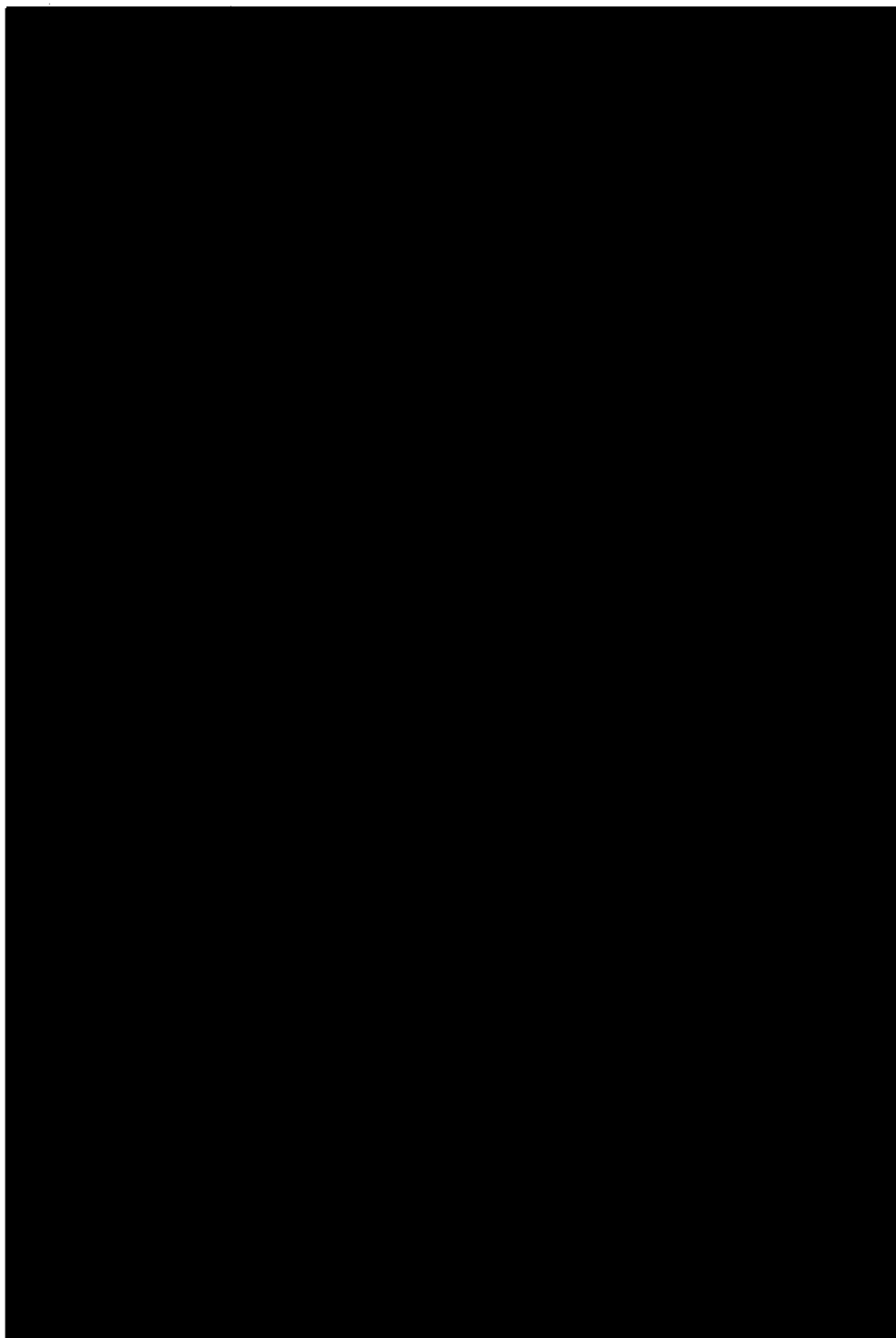
[REDACTED] would participate in media events/meetings. BMSKPA must disclose the names of all media/organizations/ individuals they contacted with respect to the events/ meetings, as well as disclose their role in the events in the June 14, 1986 supplemental statement. Following is a list of the events which appeared in the January 20 memorandum and schedule of activities.

[REDACTED]

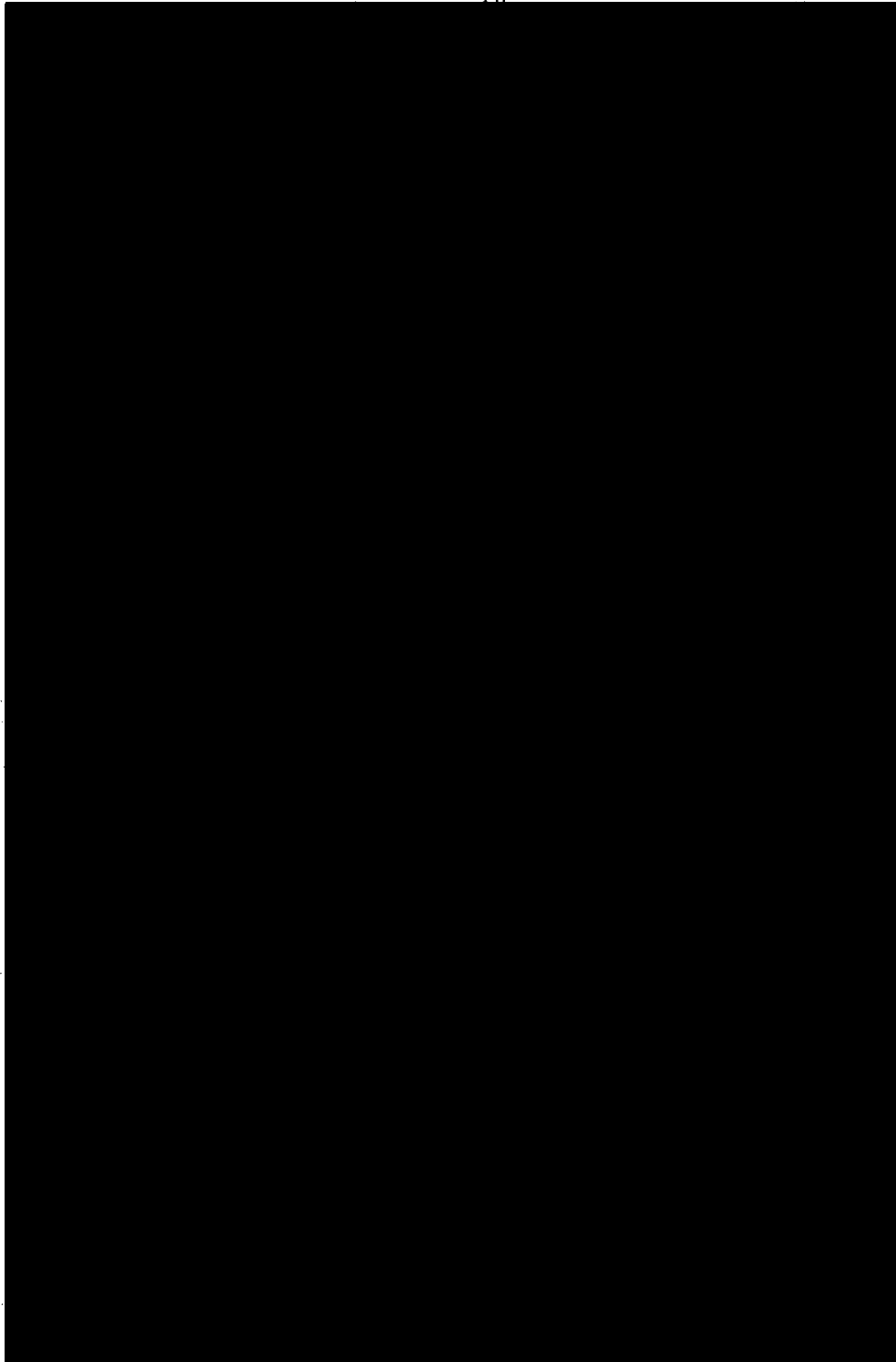



11 - A January 21, 1986 memorandum indicated someone from BMSKPA discussed with U.S. Government officials on January 22, 1986 the issue of the "... procedures that the Government of the Philippines has set in place to ensure free and fair elections on February 7, 1986." These meetings on January 22 were not disclosed in the June 14, 1986 supplemental statement.

12 - BMSKPA must disclose the names of all press organizations/contacts that it contacted on behalf of the Philippines. The following list of Philippine press contacts was found in BMSKPA's files.



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13 - An undated list of meetings/activities indicated that someone from BMSKPA met with the following individuals; this activity should be disclosed in item 12 of the appropriate supplemental statement: 

[REDACTED]  
[REDACTED] indicated in a telephone conversation with  
[REDACTED] that BMSKPA merely suggested that the Philippine Government should meet with the individuals above).

14 - BMSKPA should disclose its contact and role with respect to the [REDACTED]

[REDACTED] This activity should be disclosed in item 12 of the June 14, 1986 supplemental statement.

15 - BMSKPA must disclose the particular legislation, for example HR 2582, that it lobbied for or against on behalf of the Philippines in the appropriate supplemental statement(s).

16 - BMSKPA must indicate its role, as well as all contacts with respect to press interviews of Philippine government officials.

17 - BMSKPA must disclose its role in any hearings which were held on the Philippines (i.e. obtaining witnesses, gaining press coverage, preparing testimony etc.)

ST. LUCIA

1 - An April 5, 1985 letter to [REDACTED]  
[REDACTED] regarding exchange of information with U.S.



Treasury Department stated ". . . St. Lucia would have a negotiating team selected and ready to begin deliberations in April of this year. I so informed the U.S. Treasury Department and they are expecting to begin serious negotiations in the very near future. . . . advise me as to whether the Government still feels that these negotiations are worthwhile pursuing. . . . "I will be happy to play any role you deem advisable either as an integral part of the St. Lucia negotiating team or as a mere facilitator of your independent efforts. . . . "

BMSKPA must indicate its role in these negotiations and must disclose all U.S. Government contacts made with respect to the negotiations.

2- An April 19, 1985 letter to [REDACTED] regarding industrial development activity. If BMSKPA engaged in this activity it should be disclosed in item 12 of the supplemental statement for the period ending June 14, 1985.

3- An October 3, 1985 letter to [REDACTED] [REDACTED] indicated that BMSKPA would assist in arranging for the Small Business Journal to do a documentary on Caribbean economic prospects. BMSKPA must disclose its role in the documentary.

UNITA

1 - On October 15, 1985 [REDACTED] wrote a letter to [REDACTED]  
[REDACTED]  
[REDACTED] regarding [REDACTED] visit to Africa and his debriefing with [REDACTED]. It appears as though these contacts (letters and meeting) should have been reported in item 12 of the supplemental statement for the period ending December 14, 1985 and a copy of the letter should be provided to this Unit. Furthermore, in the future, BMSKPA should place a Section 4(e) label on letters such as this one.

2 - An October 21, 1985 memorandum to [REDACTED] from BMSKPA referred to the following activities which should have been reported in the supplemental statement for the period ending December 14, 1986.

a) BMSKPA worked with [REDACTED] and other members of the House who sent a joint letter to [REDACTED] urging that he provide material support to UNITA (This activity should be reported in item 12 of the statement).

b) BMSKPA contacted syndicated journalists as well as CBS News' 60 Minutes, The McNeil Lehrer Report, Newsweek and other major print and television outlets on behalf of UNITA. BMSKPA should list in item 12 each media organization and individual in the media that they contacted on behalf of UNITA.

c) BMSKPA assisted [REDACTED] in improving the drafting and distribution of press releases.

d) BMSKPA worked with private voluntary organizations and outside groups to collect humanitarian assistance for UNITA.

3 - On October 23, 1985 [REDACTED] wrote [REDACTED] regarding press coverage of UNITA. This contact, as well as all other such contacts should have been reported in item 12 of the supplemental statement for the period ending December 14, 1985. BMSKPA should also indicate their role in any television appearances made by Savimbi while in the U.S.

4 - At the bottom of an October 25, 1985 memorandum to Paul Manafort from [REDACTED] regarding UNITA was a message regarding hearings in Congress on Namibia and Angola. The message indicated that BMSKPA was to "...draft questions, get witnesses, etc." BMSKPA must report their role in the hearings and disclose the specific hearings in which they had a role. According to [REDACTED] [REDACTED] BMSKPA suggested witnesses. This should be disclosed in item 11 of the supplemental statement for the period ending December 14, 1985.

5 - On October 25, 1985 a packet of material was presented to [REDACTED] This activity should be reported in item 12 of the supplemental statement for the period ending December 14, 1985.

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6 - BMSKPA must indicate its role in the hearings referred to in the October 25, 1985 memorandum from [REDACTED] to Paul Manafort.

7 - An October 29, 1985 memorandum from [REDACTED] to [REDACTED] stated that "I have spoken with [REDACTED] staff... A call to [REDACTED] from you urging he testify would be very helpful." A November 1, 1985 letter from [REDACTED] [REDACTED] indicated that [REDACTED] called and wrote [REDACTED] to get him to testify. None of these contacts were reported in item 12 of the supplemental statement for the period ending December 14, 1986. [REDACTED] indicated that [REDACTED] tried to contact [REDACTED] but was never able to contact him. However, the contact with [REDACTED] should be disclosed.

8 - A November 1, 1985 memorandum to [REDACTED] [REDACTED] indicated that BMSKPA assisted in the preparation of press trips to Jamba. BMSKPA must indicate in item 12 of the December 14, 1986 supplemental statement its role in the trips and it must list the names of the press organizations and individuals contacted with respect to the press trips to Jamba.

9 - According to a November 1, 1985 memoranda to [REDACTED] [REDACTED] BMSKPA apparently assisted in the preparation of press interviews of [REDACTED] BMSKPA must indicate this activity as well as the name of the media organizations and individuals BMSKPA communicated with concerning the interviews. This activity should

be disclosed in item 12 of the December 14, 1986 supplemental statement.

10 - BMSKPA's files contained a November 5, 1985 letter to [REDACTED] [REDACTED] by direction of [REDACTED] BMSKPA must disclose their role in this activity (i.e. preparation, delivery etc.) in items 11 and 12 of the supplemental statement for the period ending December 14, 1985. Also, with reference to this letter a November 6, 1985 memorandum to Paul Manafort from [REDACTED] [REDACTED] indicated that [REDACTED] personally delivered the letter to [REDACTED] and a November 15, 1985 memorandum to [REDACTED] [REDACTED] from BMSKPA indicated that BMSKPA delivered the letter to the [REDACTED] This activity should be reported in item 12 of the supplemental statement for the period ending December 14, 1985.

11 - A November 15, 1985 memorandum indicated that BMSK worked with Congressmen and Senators to get certain legislation proposed and passed on behalf of UNITA. This was also disclosed in BMSKPA's supplemental statement for the periods ending December 14, 1985 and June 14, 1986. It will be necessary for BMSKPA to indicate in each supplemental statement the name and subject matter of each piece of legislation which BMSKPA sought to be passed in Congress. The memorandum also indicated that BMSKPA had worked with Hill Staffers and members of Congress to organize and support two Congressional Hearings on the UNITA/Angola issue. This activity must be disclosed in the statements as well.

12 - BMSKPA must report the November 18, 1985 meeting with [REDACTED]  
[REDACTED]

13 - On January 9, 1985 [REDACTED] sent a letter to [REDACTED]  
thanking her for her assistance in arranging a meeting and interview  
with [REDACTED] indicated that this  
interview never took place.

*So why the  
letter*

14 - On February 1, 1986 BMSKPA apparently hosted and/or  
participated in a dinner at the Grand Hotel. Many U.S. Government  
officials, as well as members of UNITA were present at the dinner.  
BMSKPA must disclose this activity in item 11 of the June 14, 1986  
supplemental statement, as well as provide this Unit with a list of  
U.S. Government officials who attended in order that it may be  
placed in the public file. Furthermore, if there were any speeches  
made or any material distributed at the dinner the activity must be  
reported in items 11 and 12 of the statement and if BMSKPA paid for  
the dinners they should report it in item 15 of the statement  
[REDACTED] indicated that the dinner was purely social & that no  
speeches were made).

15 - On February 1, 1986 and February 2, 1986 Savimbi appeared as a  
guest on "Evans & Novak" (CNN). BMSKPA must disclose their role in  
this activity and list all media contacts surrounding the interview  
in item 12 of the supplemental statement for the period ending  
June 14, 1986.

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16 - BMSKPA drafted a letter to be sent to [REDACTED] from [REDACTED]. This February 6, 1986 letter which BMSKPA prepared and sent to [REDACTED] should be filed with this Unit and the activity should be disclosed in item 12 of the June 14, 1986 supplemental statement. Furthermore, letters such as this should contain a Section 4(e) label. BMSKPA must also report if they assisted in the preparation of news releases and the like to be disseminated by UNITA, as well as all articles written to be sent out in congressional publications to the Members' constituencies.

17 - A February 18, 1986 letter to [REDACTED] from [REDACTED] [REDACTED] mentioned a [REDACTED] article to be placed in the [REDACTED]. BMSKPA should inform this Unit of its connection with [REDACTED] [REDACTED] as well as indicate its role in the [REDACTED] article on [REDACTED]. If BMSKPA did have a role in this article the activity should be report in item 12 of the supplemental statement for the period ending June 14, 1986.

18 - BMSKPA must indicate its role in the May 20, 1986 "Dear Colleague" letter and disclose the names of any Congressmen it was sent to by BMSKPA. The activity should be disclosed in item 12 of the June 14, 1986 supplemental statement and the names of any Congressmen it was prepared for should be listed in item 12 of the same statement (according to [REDACTED] this Dear Colleague letter was not used).

19 - A June 5, 1986 memorandum to [REDACTED] from BMSKPA referred to the following activities which should have been reported in the June 14, 1986 supplemental statement.

a) BMSKPA arranged for two U.S. based journalists to go to Jamba: [REDACTED]

[REDACTED] All media contacts relating to these press visits, as well as the activity itself should be reported in item 12 of the statement. (according to [REDACTED] is a free lance writer and made the trip on his own).

b) BMSKPA also indicated that the journalist's articles were distributed to Congress along with a "Dear Colleague Letter." BMSKPA's role in this activity should be reported in item 12, copies of the articles and "Dear Colleague letter" should be filed with this Unit, the names of the Congressmen BMSKPA sent the material to should be listed in item 12, BMSKPA should have placed a label on all material that they disseminated and dissemination reports should have been filed if BMSKPA disseminated the material.

c) BMSKPA indicated that it is in the process of arranging for [REDACTED] to go to Jamba. All media contact made regarding these visits prior to June 14, 1986 should be reported in item 12 of the statement.



d) BMSKPA, under the Military Updates and UNITA Communiques section of the memorandum, indicated that they received a military update from Angola on June 2, 1986 and then they prepared and issued a media announcement. A copy of this announcement should have been filed with this Unit.

e) BMSKPA indicated that material was entered into the [REDACTED] BMSKPA must indicate its role in seeing that the material was printed in the [REDACTED]

f) Under the Video Coverage and Photos section of the memorandum, BMSKPA indicated that they had contacted [REDACTED] [REDACTED] concerning video footage and also regarding taking their own camera crews to Angola. BMSKPA must disclose this activity as well as indicate with whom it communicated in the media on behalf of the foreign principal. This activity should be described in item 12 of the statement.

g) Under the Press Activity section of the memorandum BMSKPA indicated that they were involved in "... both initiating press interviews and widely circulating articles on UNITA." BMSKPA indicated that it had set up three interviews. [REDACTED]

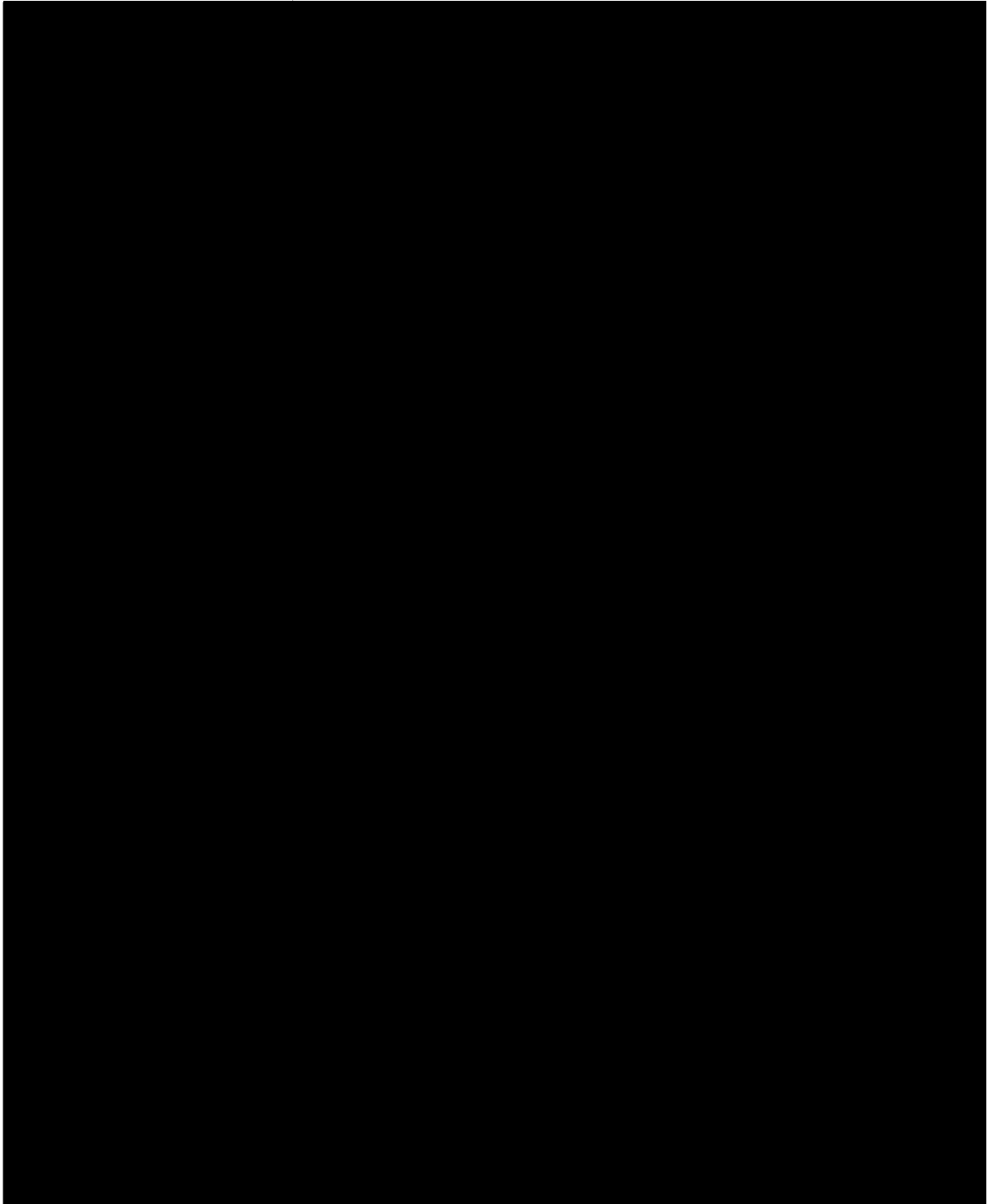
[REDACTED] BMSKPA went on to say that "when an article is printed, we contact a member of

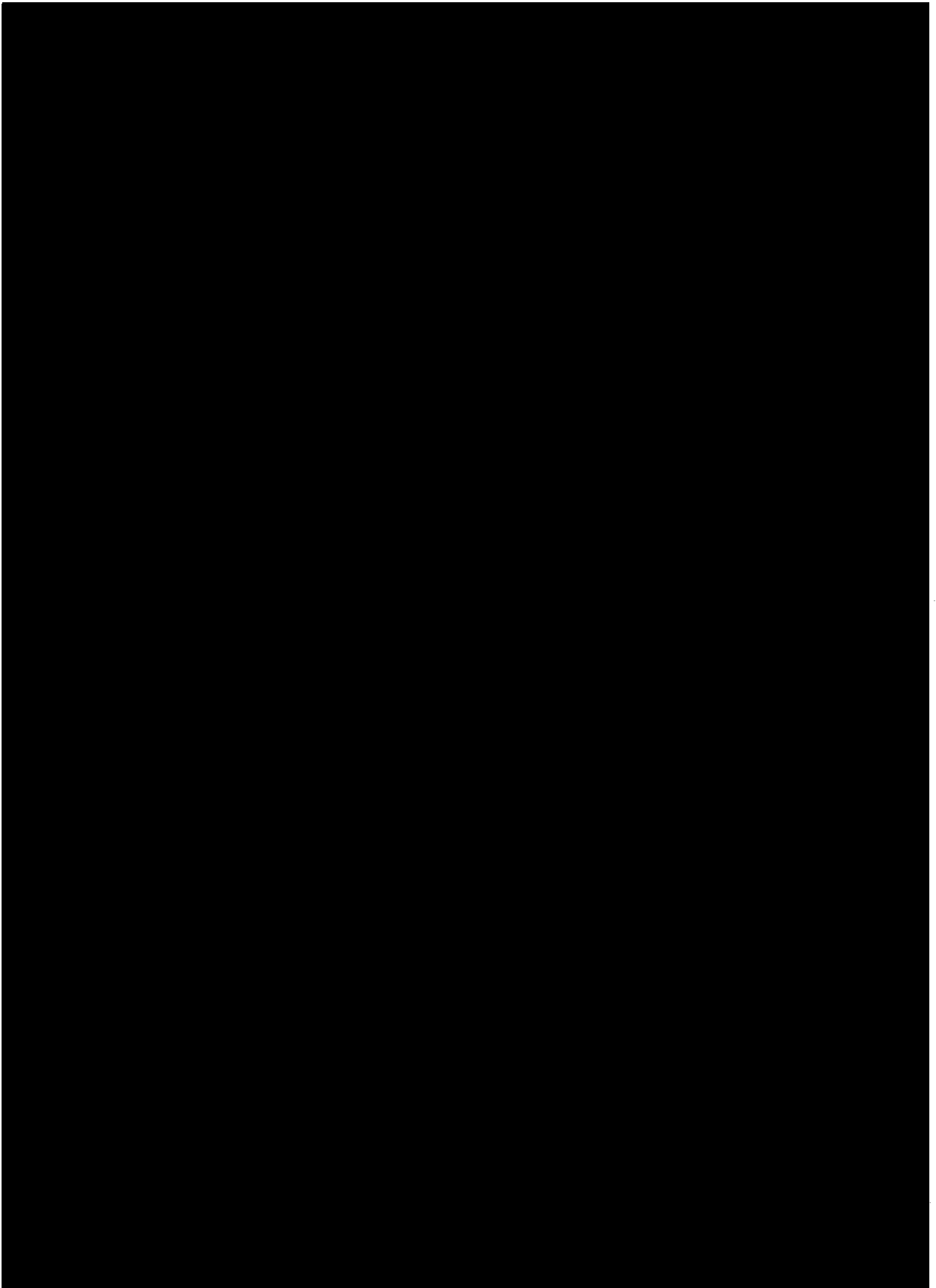
Congress to either circulate the article with a 'Dear Colleague Letter' or to enter the information into the Congressional Record." BMSKPA has not disclosed this activity. The names of all media contacts should have been listed in item 12 and the contact with the Congressmen with respect to all of the "Dear Colleague Letters" and articles, as well as the activity of having the articles printed in the [REDACTED] should have been reported in item 12 of the statement. It will be necessary for BMSKPA to provide this Unit with copies of all "Dear Colleague Letters" that BMSKPA prepared. Section 4(e) labels should have been placed on all such documents.

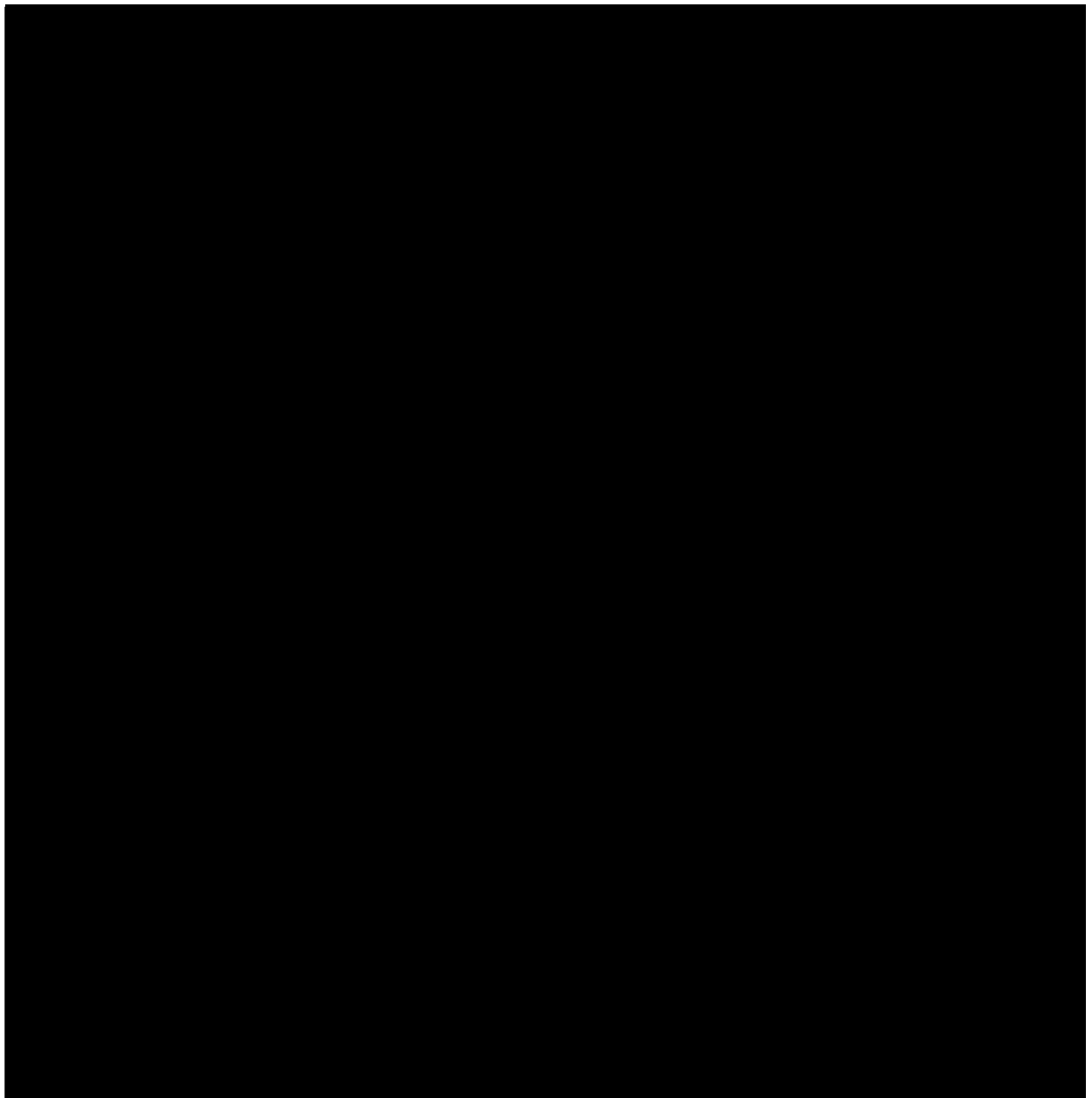
h) Under the Information Preparation section of the memorandum, BMSKPA stated that "[I]n our efforts to emphasize the legitimacy of UNITA, and the Soviet-Cuban threat to Angola, we have found it necessary to create the required information and then offer it to an outside source for circulation." This activity should be reported in item 12 and BMSKPA should indicate the "outside sources" which circulated the information. This Unit must be provided with the information which BMSKPA created for circulation.

20 - The following list is a list of activities/press interviews/contacts/meetings which were not reported in the BMSKPA supplemental statement for the period ending June 14, 1986. All of the names of

the media organizations BMSKPA contacted as well as the names of individuals BMSKPA contacted should have been disclosed. BMSKPA should also have indicated its role in the activities in which Savimbi participated.







21 - All activity such as letters, op-ed pieces, articles, etc. which BMSKPA wrote on behalf of UNITA, to be disseminated by BMSKPA or by anyone else should be reported on the appropriate supplemental statements.

Furthermore, BMSKPA should indicate its position on all issues it discussed with U.S. Government officials and BMSKPA must make a

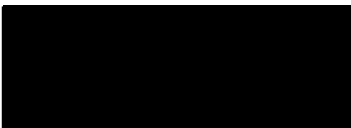
general statement of its political activities in item 12 of the supplemental statements.

Finally, BMSKPA neglected to file pages 6 and 7 of its supplemental statement for the period ending June 14, 1986.

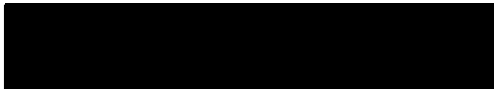
#### FINANCIAL

This portion of the inspection report will serve as an audit report of the subject registrant's compliance with the financial reporting requirements of the Foreign Agents Registration Act.

#### SCOPE OF AUDIT

 the books and records of the registrant as they relate to the Act for the period of June 14, 1984 through June 14, 1986. The examination was conducted in accordance with certain generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as were considered necessary in the circumstances.

#### OPINION

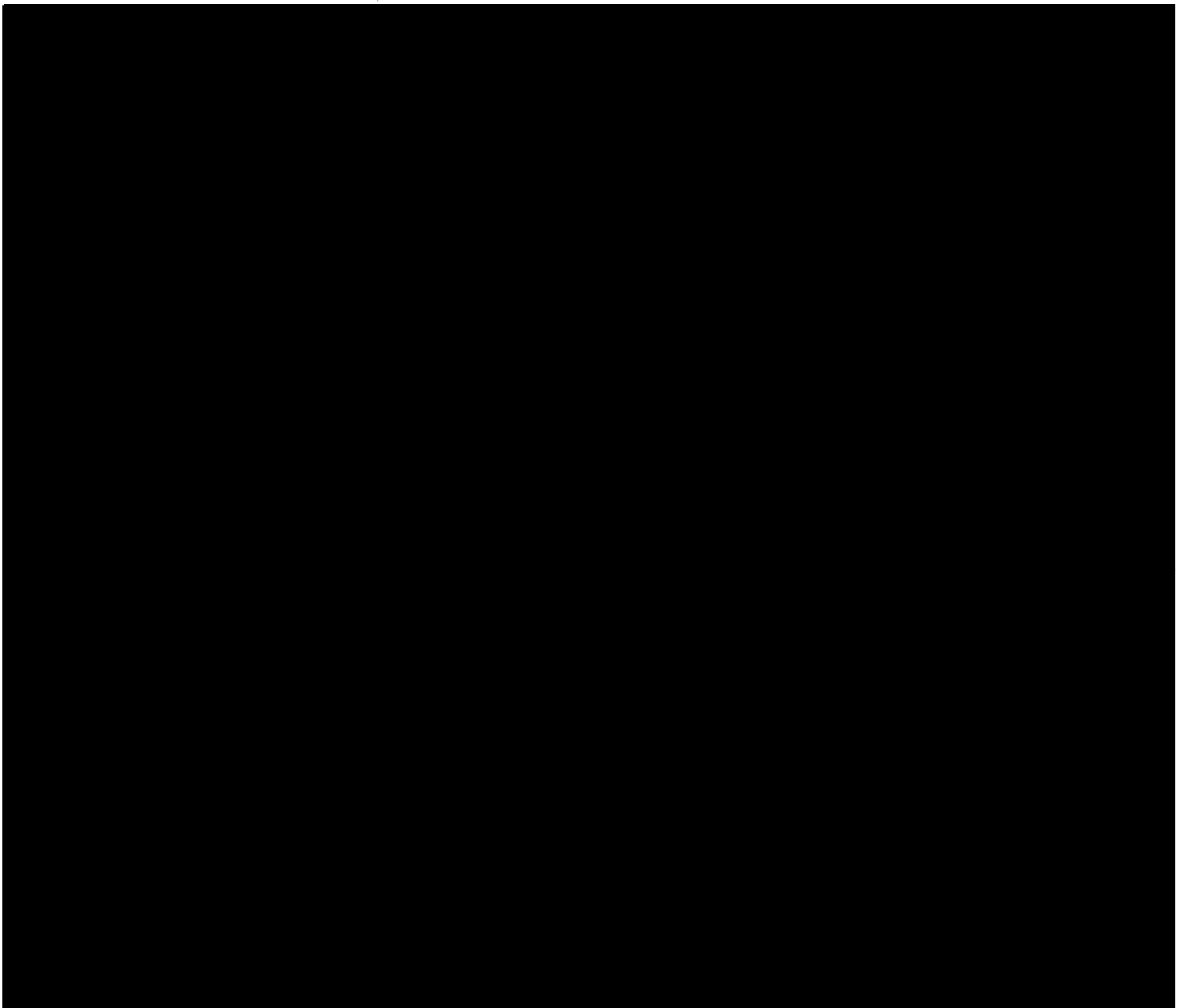
 for reasons discussed in the recommendation section of this report, the registrant's financial disclosures as presented in their supplemental statements do not

present fairly the financial activities of the registrant for purposes of the Foreign Agents Registration Act.

Black Manafort & Stone Public Affairs, Inc.

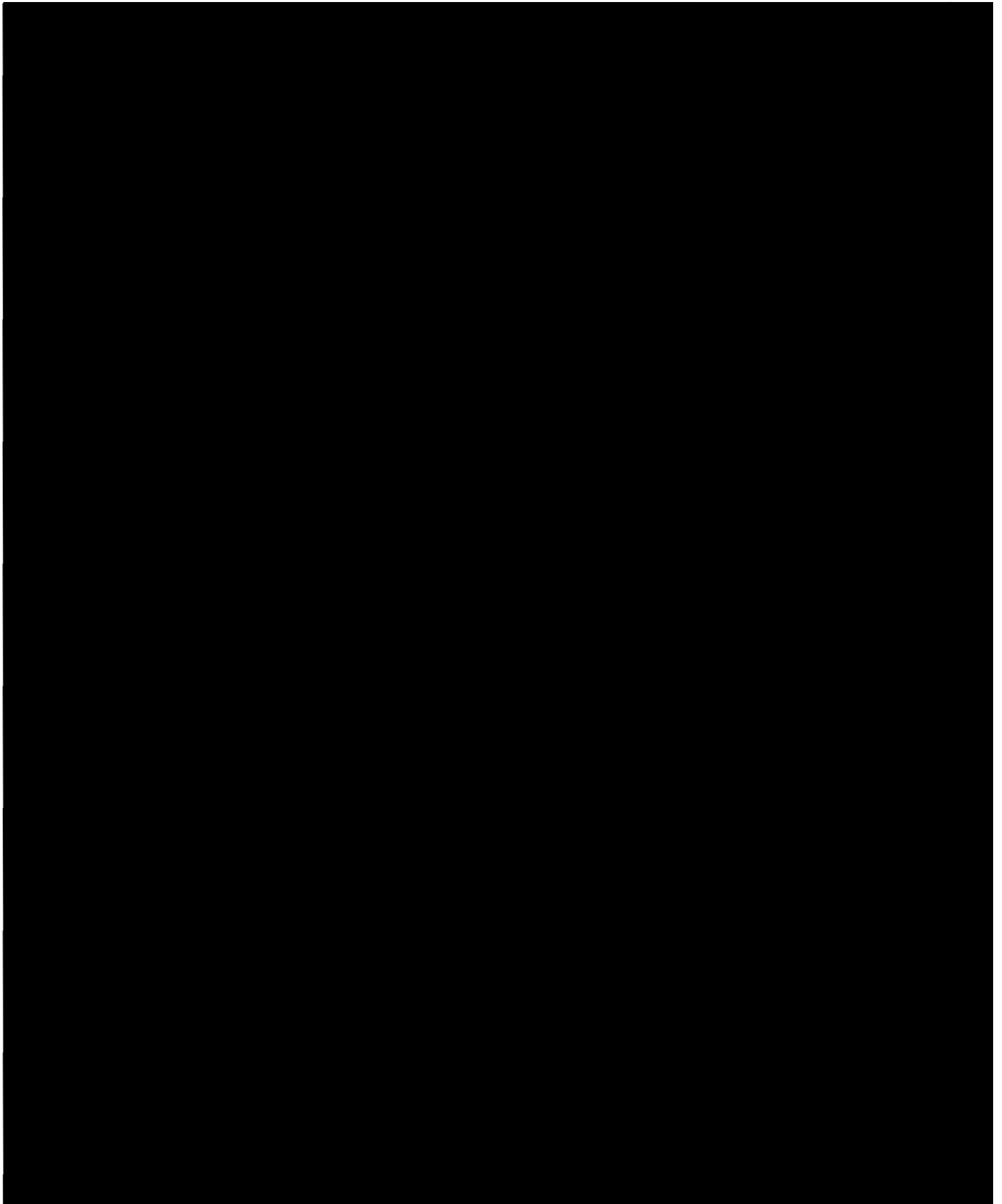
(Registration No. 3600)

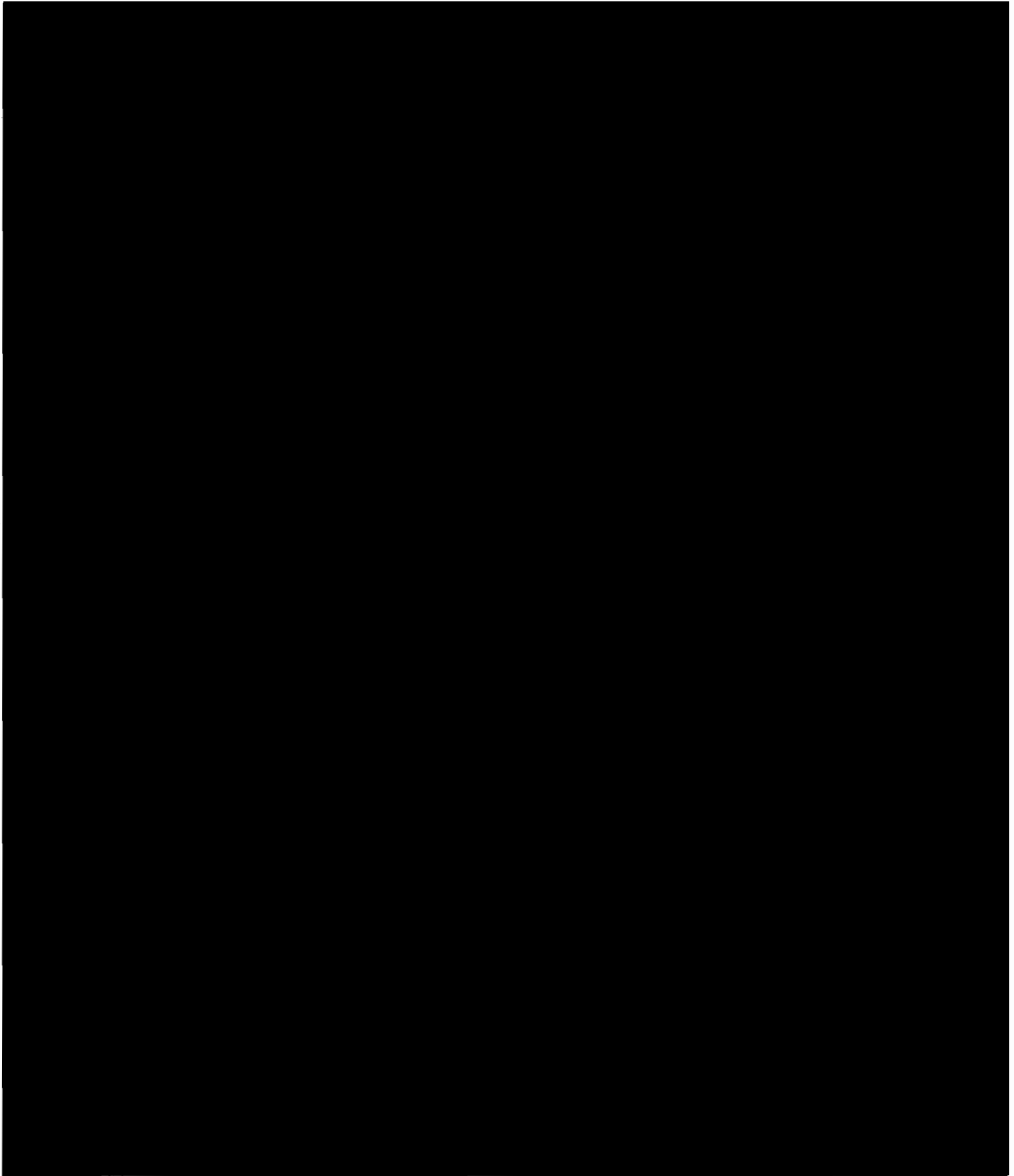
Receipts

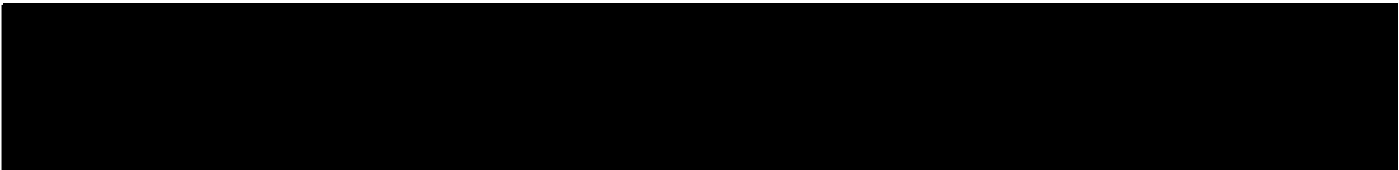








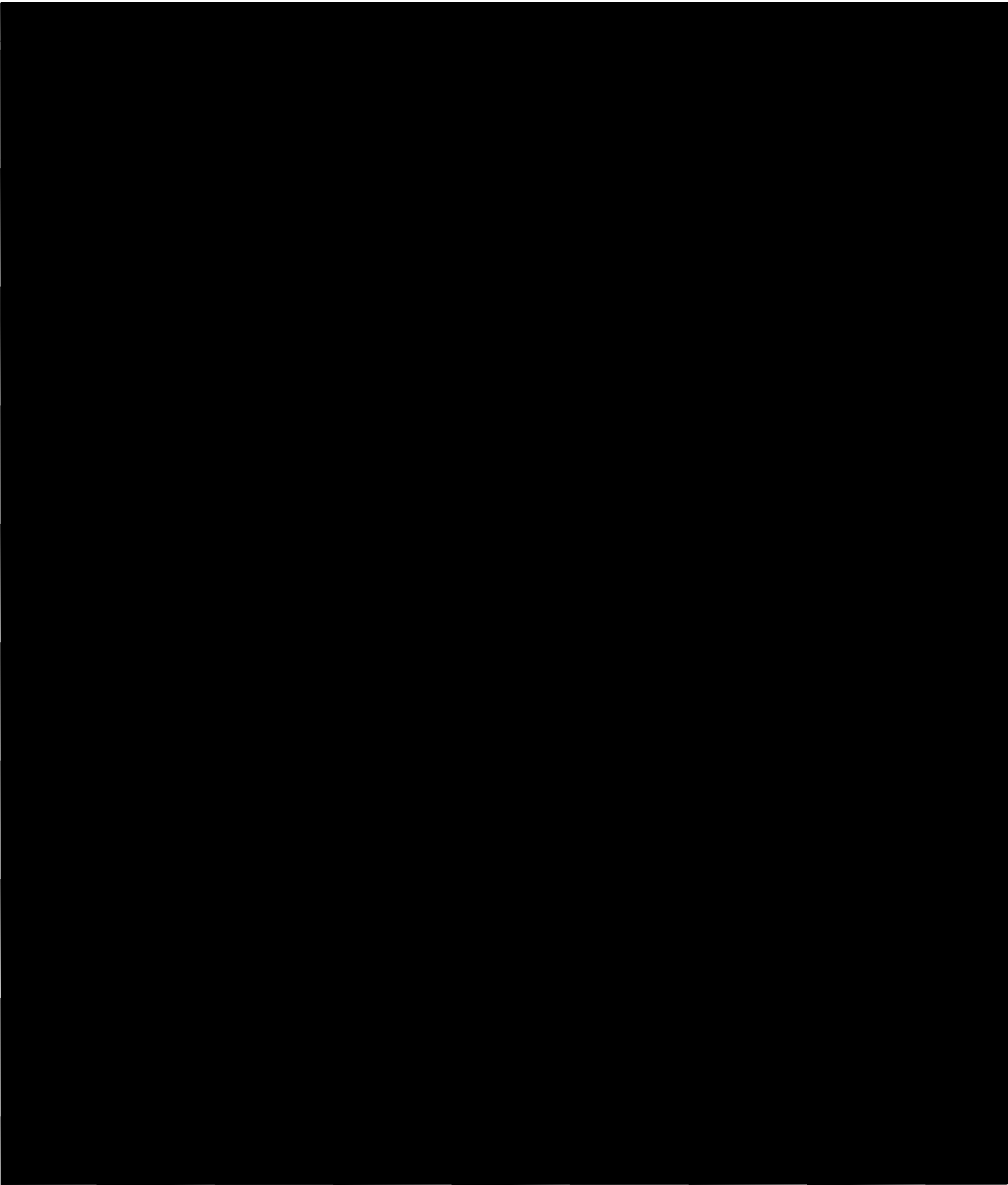


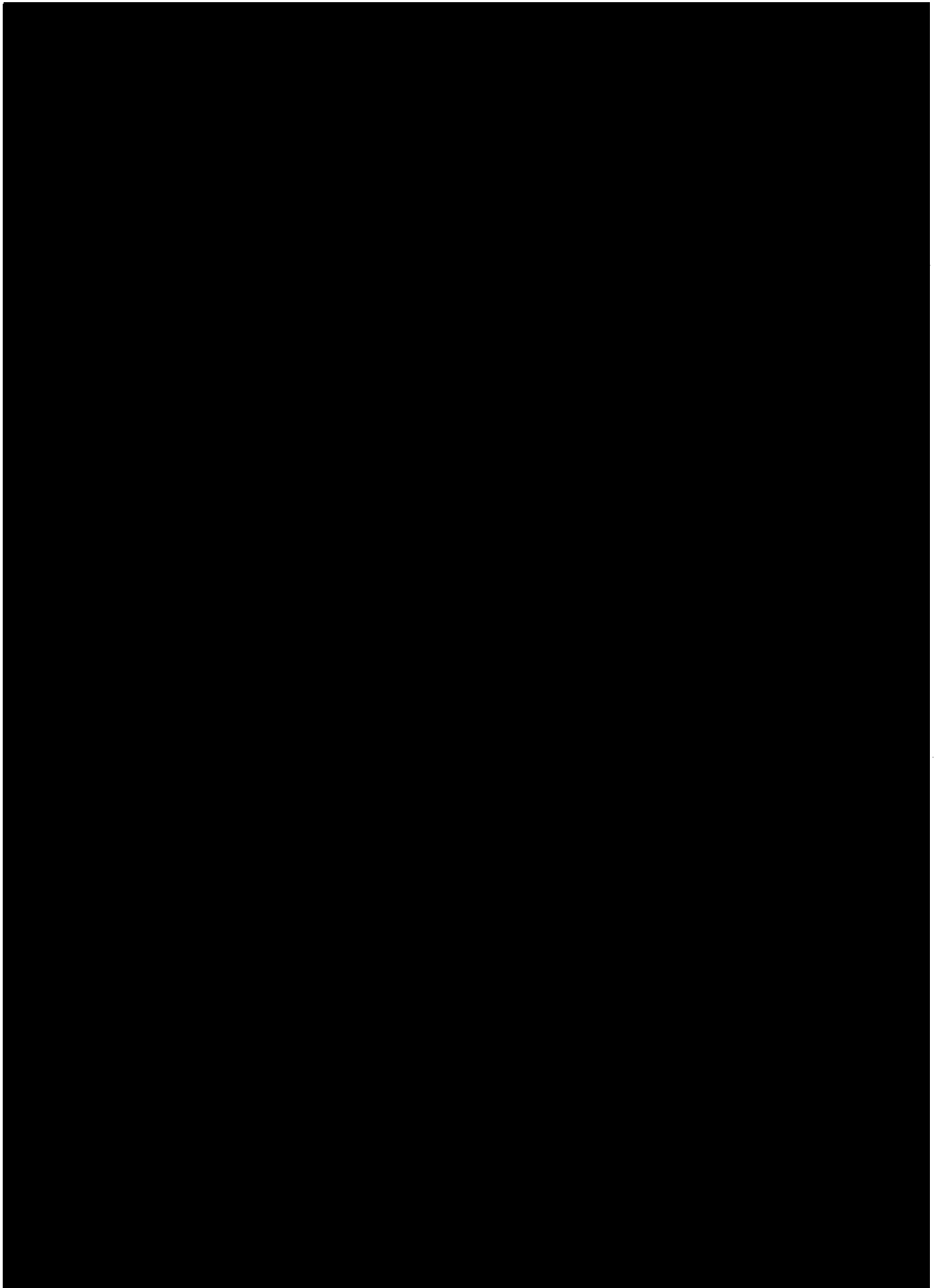


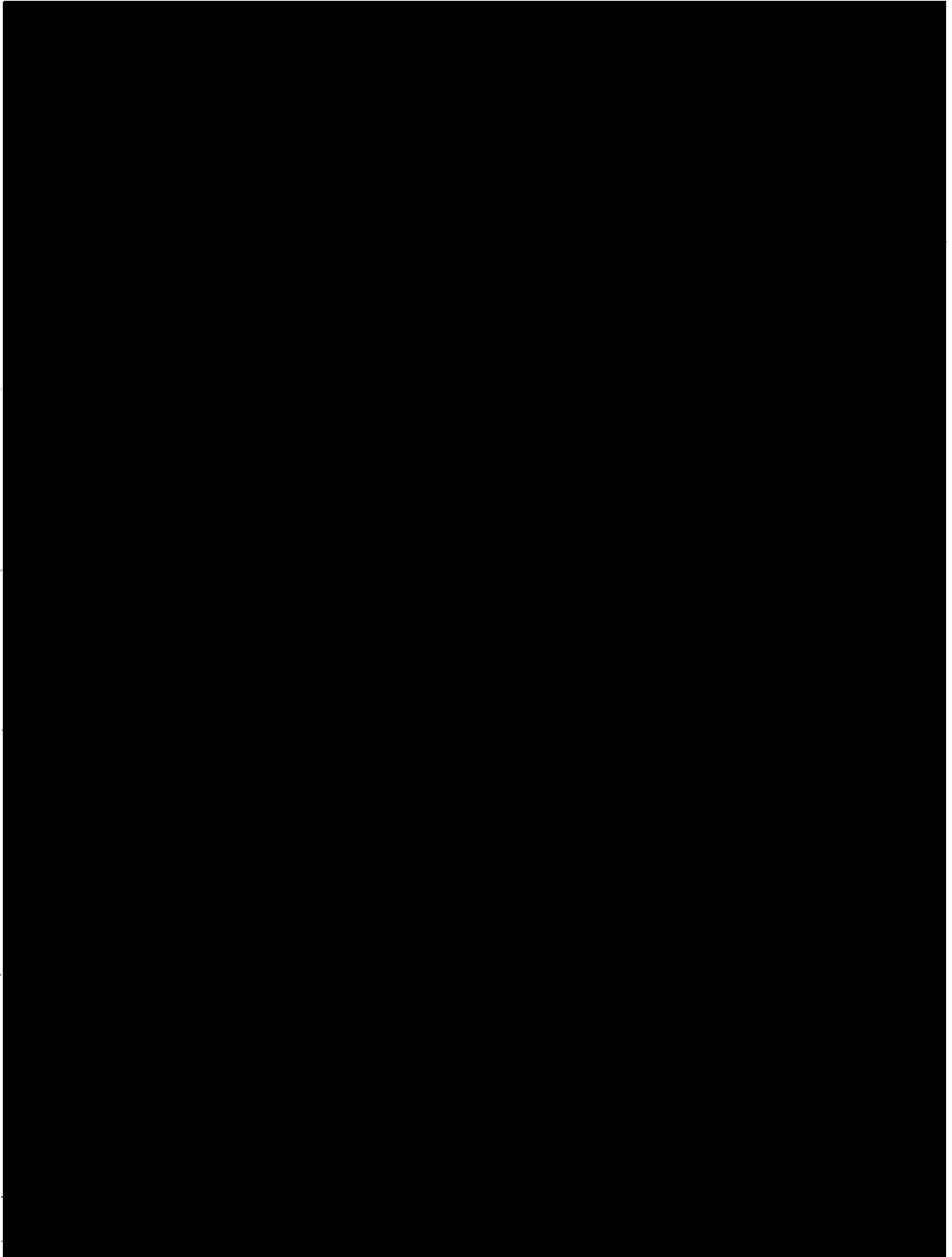
Appearing below is an analysis of the financial terms and conditions of the contracts between Black, Manafort and Stone Public Affairs, Inc. (Reg. No. 3600) and the firm's foreign principals, and the compensation the firm received as per the audit. The purpose of this analysis is to determine if the compensation received by the registrant remained consistent with the financial clauses contained in the contracts filed with this office. This analysis allows the audit to determine if funds were received by the registrant in addition to funds clearly set forth and receivable per contract, and thereby indicate the existence of an agreement between the registrant and the foreign principal not disclosed to this Office. This analysis also allows the audit to determine if the registrant was party to any agreement in which compensation was contingent, in whole or in part, upon the successful completion of any political activities.

It should be noted at this point that the books and records of the registrant as presented to the auditor did not contain any evidence of monies received in addition to monies receivable per contract, or monies received in violation of the contingency provision provided in Section 8(h), of the Act.

Black, Manafort and Stone Public Affairs, Inc.  
(Reg. No. 3600)

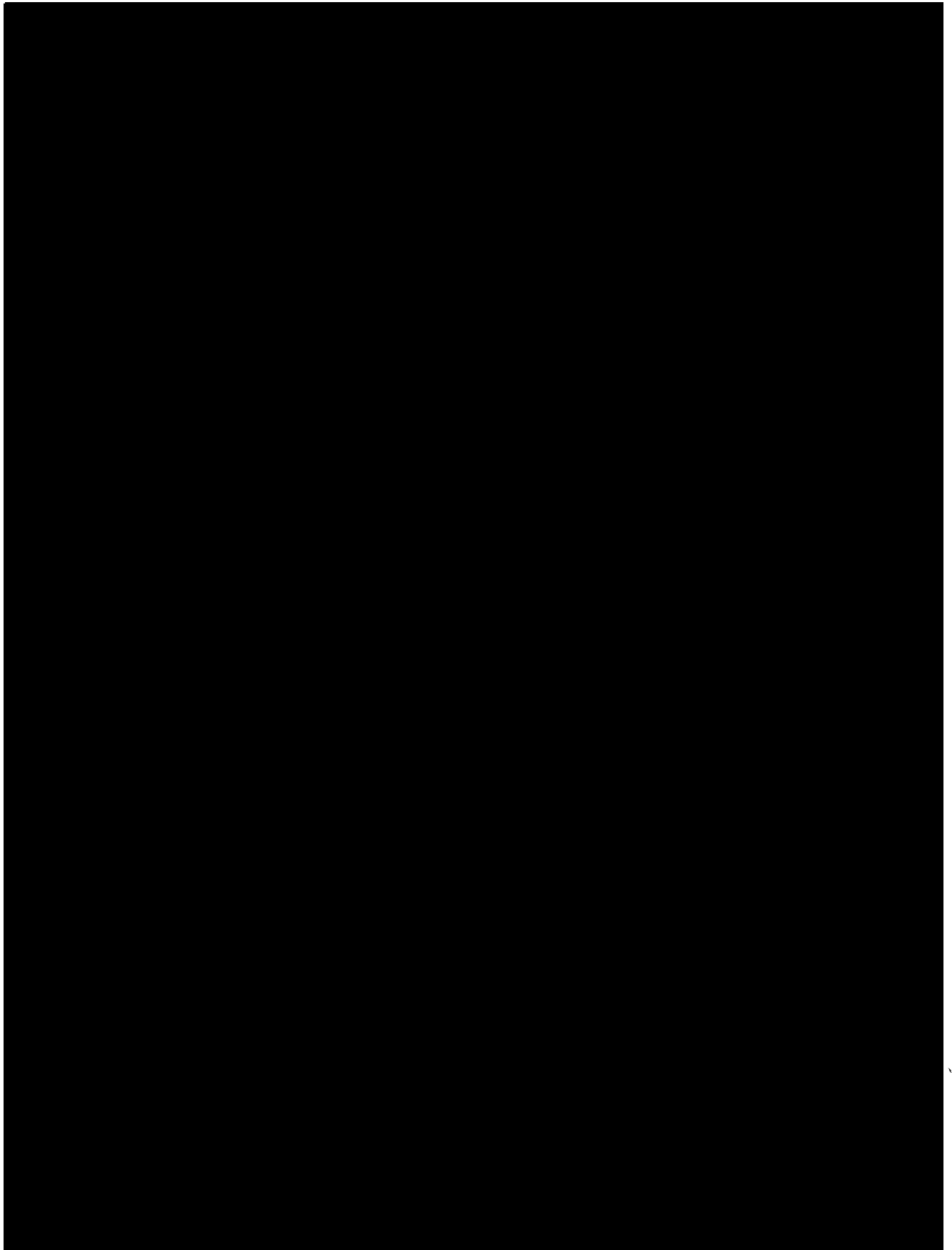




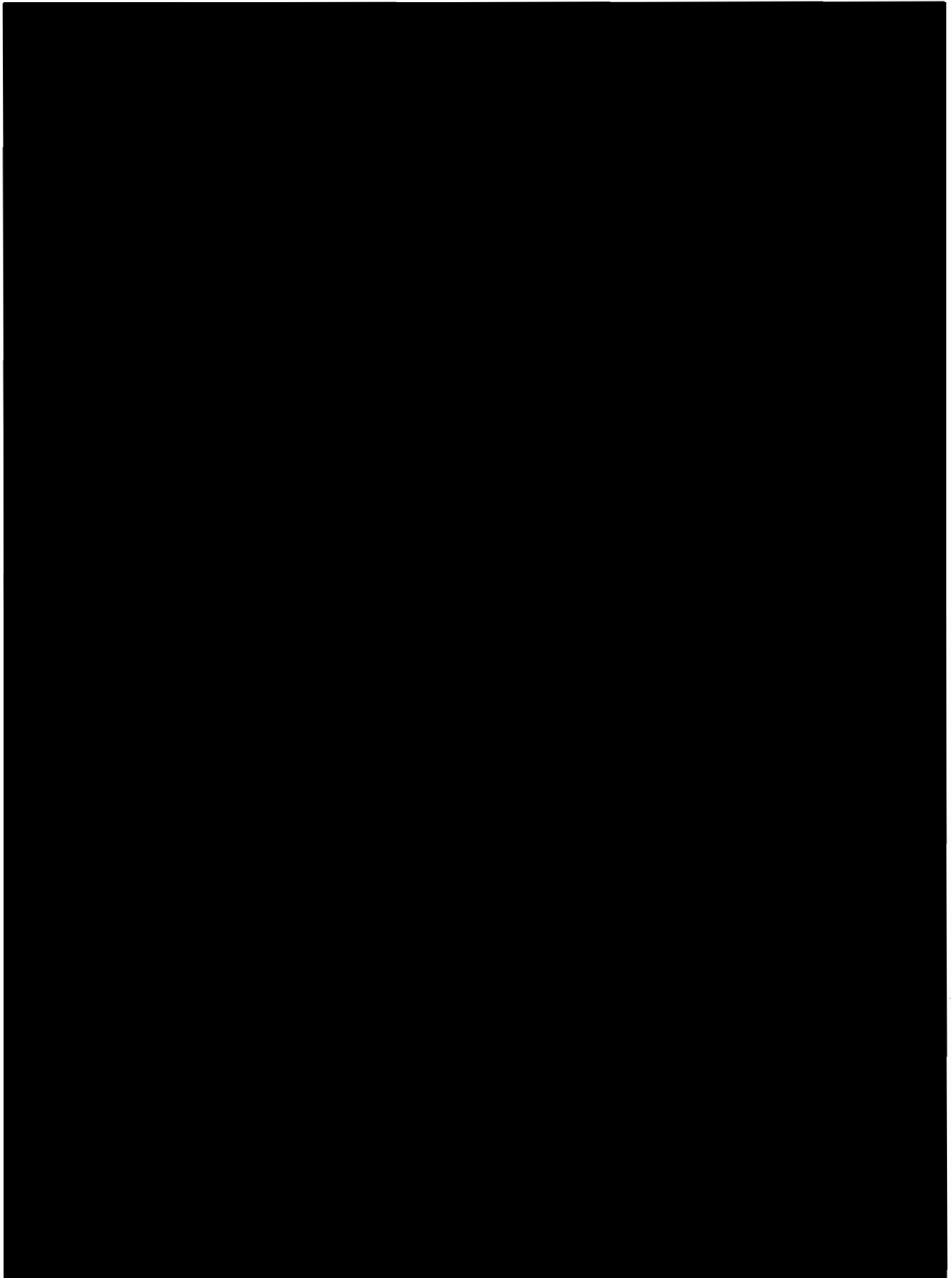


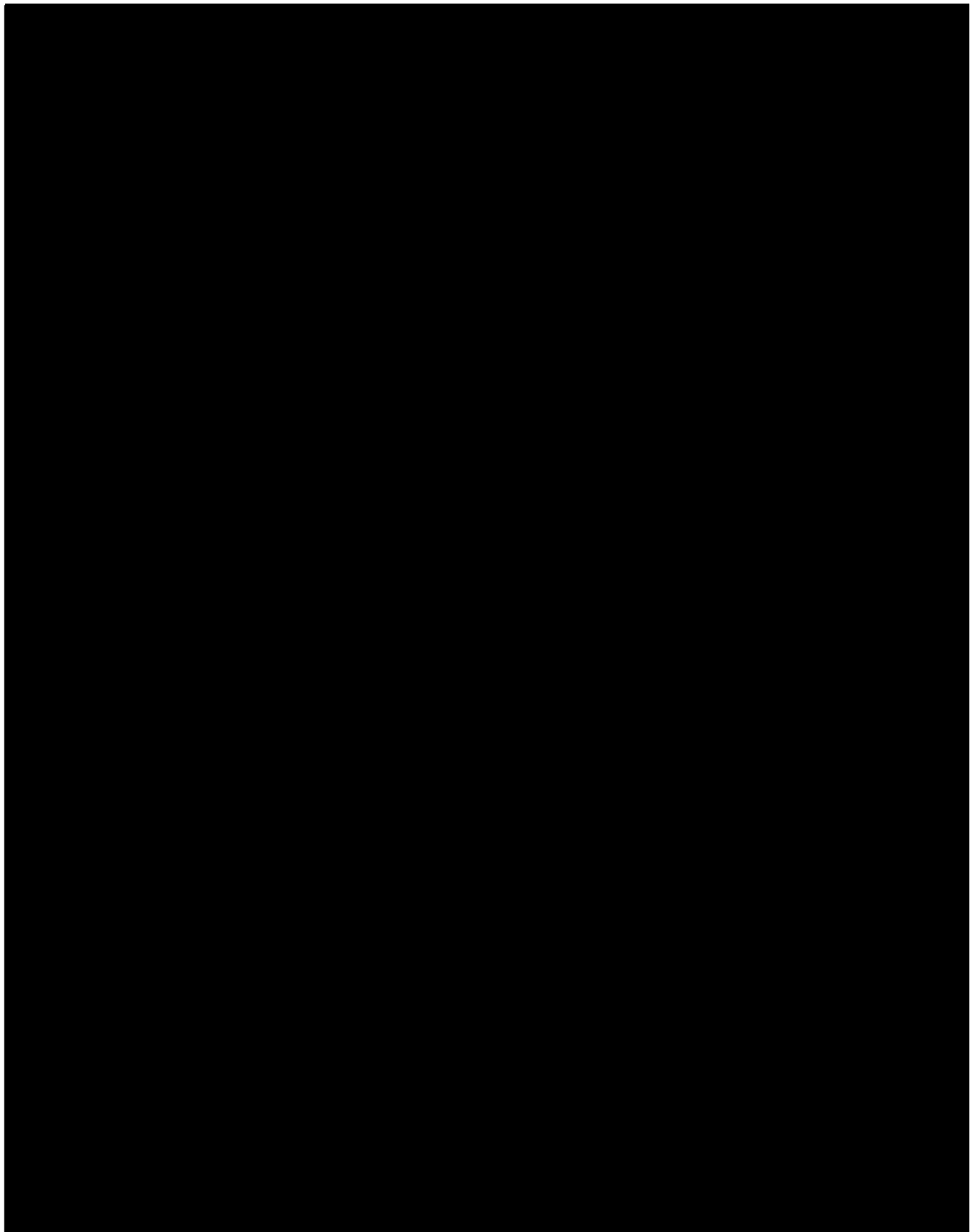
- 64 -











RECOMMENDATION

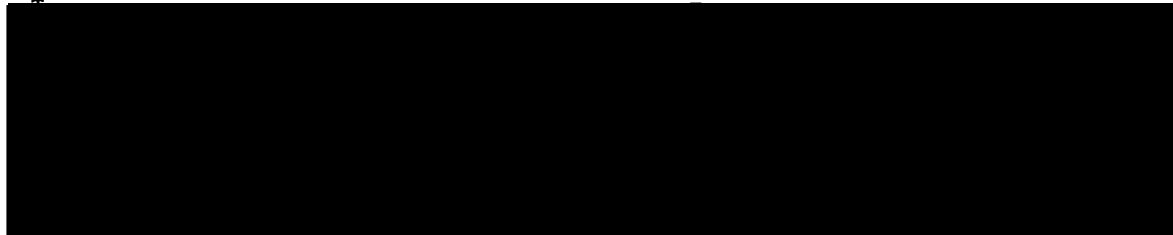
Based on the information contained in the registrant's filings and the inspection of the registrant's correspondence, office memoranda and financial records, BMSKPA did not adequately comply with the disclosure requirements of the Act. Therefore, BMSKPA must amend its registration where necessary. It is recommended that this Unit prepare a letter to BMSKPA setting forth the necessary amendments and to meet again with Nick Panuzio and Joel Dahnke to discuss the appropriate methods on how to amend the deficiencies in the BMSKPA registration.

# Memorandum

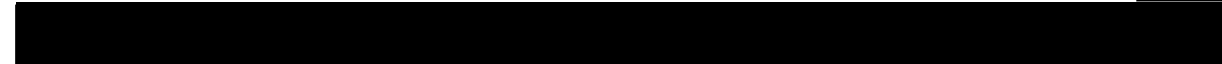


Subject  
Black, Manafort, Stone & Kelly,  
Public Affairs Company  
Registration No. 3600  
Section 5 Inspection

Date  
JEC:JB:HHH:ELP:TAR:djs  
149-139-16  
Typed: 12/3/86



During the months of July, August and September, 1986



conducted a Section

5 inspection of the Black Manafort and Stone registrations pursuant to the Foreign Agents Registration Act of 1938, as amended (hereinafter referred to as FARA or the Act). These inspections included four registrations; Black, Manafort and Stone, Inc. (#3415), Black, Manafort, Stone & Kelly Public Affairs Company (#3600), Paul J. Manafort (#3594), and Black, Manafort, Stone & Atwater, Inc. (#3710).

This inspection report concerns itself with Black, Manafort, Stone & Kelly Public Affairs Company (#3600) (hereinafter referred to as BMSKPA). The inspection was conducted in order to verify that adequate disclosure has been made by the registrant pursuant to the disclosure requirements of FARA.

JEC:ELP:TAR:djs  
Typed: 5/7/87  
149-139-16

MAY 29 1987

[REDACTED]  
Black, Manafort, Stone & Kelly  
Public Affairs Company  
211 N. Union Street  
Alexandria, Virginia 22314

Re: Paul J. Manafort  
Registration No. 3594

Dear [REDACTED]

This is in reference to the registration of Paul J. Manafort (Manafort) pursuant to the provisions of the Foreign Agents Registration Act, and to the inspection of his records conducted in accordance with section 5 of the Act.

The registrant must complete one set of amendment to registration statement forms in reference to each of the supplemental statement forms previously submitted, to detail activities undertaken and to adjust financial reporting as directed in the following paragraphs.

The activities noted below are, for the most part, activities which the registrant's correspondence, memoranda, etc., state have occurred, rather than proposed activities. If there are instances where the registrant is certain that the activity did not occur, the registrant must advise this office, in a separate letter (not on the amendment forms), that the specific event did not take place.

Note that detailed disclosure of political activities must include the identity of the persons involved, the date, place and nature of all contacts, and the purpose of the contacts. Political activities undertaken as background or to prepare for a proposal or a piece of legislation must be fully disclosed even though the proposal may have been subsequently delayed, the legislation may not have been reported out of Committee, etc.

The following issues must be addressed on the amendment forms.

1. June 29, 1984 memo Manafort and [REDACTED]  
[REDACTED] - Roundtable member companies should lobby their Senators and "coordinate their efforts through the ad hoc 'Jerusalem Contact Group' which we can put them in contact

with." Explain contacts with Roundtable, reference to "Jerusalem Contact Group," and interest in Jerusalem legislation.

2. July 13, 1984 memo to the "Jerusalem Contact Group" - Regarding the status of Jerusalem legislation, states that one member of Congress can object to a suspension of the rules, and has a handwritten note that BMS should find that member. Disclose interest in Jerusalem legislation and all activities related thereto.

3. August 4, 1984 memo Manafort and [REDACTED] - Manafort and [REDACTED] personally lobbied the offices of [REDACTED]

Report the dates, places and purposes of these contacts, and identify the persons contacted.

4. September 25, 1984 memo [REDACTED] to Manafort - Contacts with [REDACTED] concerning amendments to the Jerusalem Bill. Efforts with a group to write a minority report on the Jerusalem Bill, and references to "the loop on the Hill" and "the political White House stuff." Detail meetings with the members and with a group to write a minority report, and explain "the loop on the Hill" and "the political White House stuff."

5. March 6, 1985 letter [REDACTED] to Manafort and [REDACTED] Handwritten notes refer to efforts to include "politically oriented" language in the report being prepared on the Saudi arms package. A handwritten note to [REDACTED] asked "Did we try to get this into report?" Reply - "Yes through the usual channel. WB." Detail efforts to include the "politically oriented" language.

6. April 11, 1985 memo Manafort and [REDACTED] - Extensive activities during first quarter of 1985, saw registrant serve as a communications link between elements of the Administration and a communications filter between the Administration and Capitol Hill, contacts with agencies, Administration officials, and members and staff of Congress. Detail all of the contacts mentioned in this memo.

7. March 29, 1985 letter [REDACTED] - enclosing two articles to be passed on to [REDACTED] or his staff. Were the articles given to Lugar, his staff, or anyone else?

8. April 23, 1985 memo Manafort to [REDACTED] - "... we are trying to persuade the White House to emphasize to the NSC the need to force the study to a conclusion. ... we have presented the anxieties which we have picked up in our conversations on Capitol Hill." Detail all White House and Congressional contacts.

9. June 14, 1985 memo Manafort and [REDACTED] - Extensive second quarter activities described, including contacts with the Administration and Congress, as well as activities on behalf of Jordan and their lobbying counsel. Disclose lobbying activities

with Congress, White House, State Department, Defense Department and other agencies, and detail activities in connection with Jordanian aid package and with Jordan's lobbying counsel.

10. September 3, 1985 memo Manafort and [REDACTED] - Third quarter activity report stated registrant served as communication link between the Administration and Congress, balanced AIPAC's efforts with key Senators, delayed efforts to revive Resolution 177 and clarified Saudi role in financing Jordanian arms package. Detail contacts with Administration and Congress, and activities to balance AIPAC efforts, delay Resolution 177, and clarify Saudi role in Jordanian arms package.

11. Undated document [REDACTED] - "Latest State Department - [REDACTED] poop on Jerusalem"-Refers to [REDACTED] Hill and [REDACTED] followed by notation "BACK CHANNEL". All contacts must be reported.

12. Undated document [REDACTED] - [REDACTED] attended meeting held by NAAA on Saudi Arms Sales. As a result the following is suggested as content for a telex to go out to Roundtable Members" (three paragraphs follow). Explain contacts with US/Saudi Roundtable (see paragraph #1), whether telex sent by Roundtable.

13. December 30, 1985 memo Manafort to [REDACTED] - Activities for the fourth quarter included communications with Congress and the Administration. All contacts must be detailed, including efforts to balance AIPAC lobbying. Registrant must report any connection with [REDACTED] discussion with [REDACTED] and activities undertaken on issues of discussion between [REDACTED]

14. January 8, 1986 document - The writer (unidentified) had lunch with [REDACTED] and discussed Saudi Arabia, the Philippines and the Foreign Assistance Bill. No expenditure for lunch with [REDACTED] was reported. Explain interest in Philippines and Foreign Assistance Bill.

15. April 25 and April 30, 1986 memos Manafort to [REDACTED] - Initiated grass roots campaign among home state supporters of certain Senators in connection with the Saudi arms proposal, and followed up on calls that haven't been made. Detail grass roots campaign, including the states involved.

16. April 25 and April 30, 1986 memos Manafort to [REDACTED] and April 25, 1986 memo Manafort to the Intercontinental Hotel - Refer to "talking points" which the registrant "provided". The Intercontinental memo had an attachment "Talking Papers for Telephone calls on Pending Saudi Munitions Sale." Were the "talking points" distributed to supporters of Senators (see paragraph 15), the White House, State Department or others?

17. April 30, 1986 memo Manafort to [REDACTED] - "I have had several conversations with [REDACTED] on the arms sale. Their column

appears in today's [REDACTED] ... and we are circulating it in appropriate places." Report contacts with [REDACTED] explain statement relating to [REDACTED] column that registrant is "circulating it in appropriate places."

18. Stepno notebook, page 9 - A copy of the "Q&A" was left in [REDACTED] and additional information on oil output was requested. Provide a copy of the "Q & A" and state whether it was given to anyone other than Nickels, and advise as to whether additional information on oil output was provided.

In addition, a comparison of the results of our audit of the registrant's books and records with the amounts reported on the supplemental statements disclosed the following discrepancies, which must be corrected on the amendment forms.

[REDACTED]

The response and questions concerning this inspection should be addressed to the attention of [REDACTED] of this office.

Sincerely,

[REDACTED]

Enclosures

cc: [REDACTED]



# Memorandum



Subject Paul J. Manafort 18 U.S.C. § 219	Date DEC 22 1987 JEC:FJC:djs 149-46-62 Typed: 10/15/87
--	--

To

From

*Agree*  
*DC*  
[Redacted]

## INTRODUCTION

By letter dated May 16, 1986, [Redacted]

[Redacted] a United States Government Agency, referred to this Division a potential violation of 18 U.S.C. § 219 (Section 219) by a former OPIC director, Paul J. Manafort, who had resigned that day. The basis of the criminal referral was that while serving as an OPIC director from October 21, 1981 to May 16, 1986, Manafort was also registered under the Foreign Agents Registration Act of 1938, as amended, as an agent of several foreign principals. 1/

Section 219 provides in pertinent part:

Whoever, being a public official of the United States in the executive, legislative, or judicial branch of Government or in any agency of the United States. . . is or acts as an agent of a foreign principal required to register under the Foreign Agents Registration Act of 1938, as amended, shall be fined not more than \$10,000 or imprisoned for not more than two years, or both.

1/ After becoming an OPIC director, Paul Manafort filed short forms for the following countries: Bahamas, Dominican Republic, Nigeria, Peru and Saudi Arabia. He also filed a short form for U.N.I.T.A. and signed his firm's contract with the Philippine Manufacturers, Exporters & Tourist Association (PMETA or the Philippines). His firm also represented the United Bermuda Party, the News Corp. Ltd. (Australia), the Institute for Financial and Fiscal Studies of Curacao and the Governments of Barbados and St. Lucia.

Nothing in this section shall apply to the employment of any agent of a foreign principal as a special Government employee in any case in which the head of the employing agency certifies that such employment is required in the national interest.

Since Manafort's registrations do not contain any certificate from the White House that his employment was required in the national interest, there appears to be a literal violation of Section 219.

#### SUMMARY OF FACTS

Manafort became a director of OPIC in October, 1981. In October, 1982 he simultaneously registered with the Justice Department as an agent of the Dominican Republic and recused himself from OPIC matters involving that country. In 1983 the White House made a policy decision not to certify the employment of any foreign agent as required in the national interest in the absence of an extraordinary emergency or extremely unique circumstances. Manafort attempted to convince the White House that his circumstances were unique on the ground that his firm, rather than he personally, was conducting the political activities for the Dominican Republic which required registration. Although he made some progress with this argument, and the Justice Department agreed that such a hypothetically uninvolved person need not register, in the end no one at the White House was willing to sign the certificate. However, Manafort was not required by the White House to resign his OPIC position at that time.

When Manafort's OPIC term expired, he began serving as a holdover director. During this period the record reflects that Manafort recused himself from a second matter, with a domestic client, which would have involved a conflict, absented himself from a third matter, involving his client, Saudi Arabia, and refused to get involved in a minor matter involving his client, the Bahamas, because of the appearance it would create. In the reappointment process Manafort disclosed all his foreign clients and the White House insisted that he resign as a foreign agent, which he did. Later, however, Manafort signed his firm's contract with PMETA, and was briefly quoted on their behalf in the New York Times, Time and Newsweek. Following some generally unfavorable attention in the media to this contract and to lobbyists generally, Manafort reregistered for a number of countries, and assumed a more active role in representing clients, but did not resign as an OPIC director. A CBS news report on conflicts highlighted the Manafort situation, and he resigned a few days later, the same day the criminal referral was made to the Justice Department.

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THE FACTS

On October 20, 1981, Manafort took the oath of office as a presidentially appointed director of OPIC, following his confirmation by the Senate a month earlier. Approximately one year later, on October 5, 1982, Manafort simultaneously registered with the Department of Justice as an agent of the Dominican Republic and recused himself from OPIC matters relating to that country in a letter to OPIC President Craig Nalen. Linn Williams, then General Counsel at OPIC, later advised in a telephone interview, before departing for private practice in Japan, that when the matter of Manafort's representation of the Dominican Republic came up, that both a section 219 waiver and recusal by Manafort were considered as solutions to the problem, and that since the White House had some policy objection to a waiver, recusal was suggested to Manafort.

In 1983 the White House focused on the section 219 problem as a result of the controversy surrounding the activities of [REDACTED]. As a result, a policy decision was made for the President not to certify the employment of agents as required in the national interest "in the absence of an extraordinary emergency or extremely unique circumstances." On April 28, 1983, in accordance with this policy decision, [REDACTED]

[REDACTED] which directed her to notify Manafort to resign his status as an agent or his appointment would not go forward. Fielding then sent a memo dated May 10, 1983 to [REDACTED] advising the Department of Manafort's prima facie violation. The memo stated:

When 18 U.S.C. § 219 was brought to our attention, the policy decision was made not to issue certificates to individuals who are or subsequently become registered agents in the absence of an extraordinary emergency or extremely unique circumstances. . . (therefore). . . (Manafort). . . is being notified by Presidential Personnel and advised that if he plans to continue as a registered agent his resignation is requested or his appointment is not going forward. (emphasis supplied)

However, the White House has no record that [REDACTED] ever requested Manafort's resignation, and [REDACTED] memo to [REDACTED] never reached the Registration Unit.

On May 16, 1983, Manafort sent a letter to [REDACTED] with a copy of his registration statement for the Dominican Republic, in which he argued that his unique circumstances should allow him to continue serving on the OPIC board. He stated:

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"You will notice that the name of the registrant is Black, Manafort and Stone, Inc. I am listed as a Director and Partner of the firm." He continues "I hope this resolves the issue in a manner that will allow me to continue to serve on the Board of Directors of OPIC. If there is any further problems (sic), please contact me in order that we might resolve it expeditiously."

██████████ advised when interviewed that Manafort had heard about the Section 219 policy decision and was unhappy about it, and contacted him both because he knew him and because OPIC (permanent employees) were within his domain. ██████████ advised that the matter Manafort raised was beyond his competence to decide, so he sent it to the Counsel's office. On September 12, 1983 ██████████ Fielding responded to Manafort's point in a memorandum to ██████████

This policy left open the status of a prospective appointee who is a member of a firm that is a registered agent but who himself does not perform any work requiring him to file an individual "short form" registration statement. The (Justice) Department has concluded that so long as such a person is neither (1) listed on the firm's registration statement as being directly involved in activities in furtherance of the goals of the foreign principal nor (2) is on file as an individual registrant, then section 219 does not apply. If the prospective appointee is registered (in the firm's registration or individually), however, then he must either "deregister" and cease all activities on behalf of the foreign principal or withdraw from Government service consideration.

A November 29, 1983 memorandum from ██████████ ██████████ again emphasizes that "the above paragraph refers to Paul Manafort." The decision then was not to grant a waiver, but to force Manafort to choose between government service and his firm. However, again there is no record that Manafort was advised to resign before his term expired on December 17, 1983, and nothing more happened on the matter until after the 1984 election.

On June 4, 1984 Manafort registered for Saudi Arabia as a short form registrant under the name of his law firm, Paul Manafort. An inspection of the books and records of this firm revealed an August 4, 1984 memorandum that indicates Manafort personally lobbied some Senators on an issue for Saudi Arabia.

In January and February 1985 Manafort received form letters from Presidential Personnel and the White House Counsel congratulating him on his prospective reappointment and sending him copies of a personal data statement (PDS) and financial disclosure form, along with several pages of conflicts laws and regulations, but not including Section 219. On February 11, 1985 Manafort sent [REDACTED] a PDS listing Saudi Arabia as a personal client and Barbados, the Dominican Republic and St. Lucia as clients of his firm. The White House could not locate a copy of this form, stating:

"We have been unable to locate the PDS which Mr. Manafort apparently forwarded in February of 1985. However, our computer records and our attorney interview memorandum indicate we did receive such a document."

On March 25, 1985 [REDACTED] made some handwritten notes about a discussion he had with [REDACTED] about the Manafort appointment and the waiver issue. According to [REDACTED] the "original deal" was that Manafort would serve as OPIC Director, and the waiver would be signed by [REDACTED]. However, [REDACTED] declined and sent the waiver to [REDACTED] for his signature; however, [REDACTED] also refused. [REDACTED] allegedly talked to Manafort and [REDACTED] of OPIC about this. On April 11, 1985 [REDACTED] interviewed Manafort regarding his registering and acting as a foreign agent. Manafort indicated that his law firm registered for the Government of Saudi Arabia on July 4, 1984 and that his public relations firm registered for the governments of St. Lucia, Barbados and the Dominican Republic on October 5, 1982. Manafort told [REDACTED] that while he is registered for various foreign clients he is not actively participating in the representation of the clients. [REDACTED] memorandum of this interview, dated May 24, 1985, states that they discussed both the felony prohibition in Section 219 against simultaneously acting as a foreign agent and as a U.S. government employee, and the exemption for certified employees, and that "to the best of my (L.G.) knowledge, no such certification has been issued in regard to Mr. Manafort". He concluded:

"Since Mr. Manafort is listed on both of the aforementioned foreign agents registrations (his law firm and public relations firm), I requested that he remove himself from such registration statements notwithstanding his representation that he is not involved in representing the listed foreign governments. Mr. Manafort agreed to do so and further agreed to provide us written evidence of such "deregistration".

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On May 29, 1985 the Tribune (Bahamas) gave a detailed treatment of the BMS&K registration. Manafort had registered for the Bahamas on May 1, 1985. [REDACTED] of BMS&K had a meeting with OPIC staff regarding sending an "investment mission" to the Bahamas. About a month later, on July 8, 1985, [REDACTED] sent a memo to Manafort asked him to "get [REDACTED] to tell" OPIC mission office to go to the Bahamas. Manafort's handwritten note says "Can't do, bad perceptions". [REDACTED] has confirmed through his [REDACTED] that Manafort never approached him on the issue. On July 9, 1985 OPIC decided not to send an investment mission to the Bahamas, and BMS&K was so advised on July 10, 1985.

On June 4, 1985 Manafort terminated his short form for Saudi Arabia under the registration of his law firm, and on July 16, 1985 he terminated his short form for his BMS&K clients. On July 23, 1985 Manafort sent a copy of the amendment to the BMS&K registration to [REDACTED], but because there was no amendment terminating his agency for Saudi Arabia, [REDACTED] thought that Manafort's individual registration for Saudi Arabia was still a problem. Consequently, Manafort's nomination was never processed.

On October 25, 1985 BMS&K began representing PMETA, a business association with close ties to the [REDACTED] government which worked for his reelection. On November 22, 1985 the New York Times printed an article "Firm Registering as Lobbyist for Group Linked to Marcos", quoting Manafort as stating: "I'll be an advocate. . . on behalf of the issues of bilateral interest the (Philippine) Government cares about." On November 25, 1985 BMS&K registered for PMETA, but not Manafort. On December 6, 1985 [REDACTED] wrote up his version of the discussion he had with [REDACTED] "last week" regarding "the Manafort reappointment". In it [REDACTED] advised that Manafort was taking the position that his firm, and not he, personally, was an agent. [REDACTED] threw some doubt on this interpretation of Section 219 by highlighting the "is or acts as an agent of a foreign principal" language from it. He reinforced this with his own conclusion to insist that Manafort recuse himself from "any matter affecting countries his firm is known to be representing." However, the issue, as [REDACTED] saw it at the time was:

Until the White House determines either to grant Mr. Manafort a waiver and process his reappointment, or to appoint a successor, he is still permitted to function as a director by virtue of the "holdover" clause in OPIC's statute.

Manafort was quoted in articles in the March 3, 1986 issues of Time and Newsweek regarding the BMS&K representation of PMETA. BMS&K promoted Marcos' reelection campaign to the American public for PMETA, attempting to make the elections more credible. Other articles in the media that week focused a critical look on lobbyists with ties to the administration, including Manafort.

Manafort responded to this publicity by filing short forms for the Bahamas, the Dominican Republic, Nigeria, Peru and UNITA on March 11, 1986. Late the following month, on April 29, 1986, Manafort was scheduled to attend an OPIC Board meeting, but did not. On May 5, 1986 Manafort was personally involved in political activities for Curacao, sending a letter to [REDACTED] on tax reform.

On May 12, 1986 [REDACTED] brought the matter to a head with a nationally televised report on lobbying. He stated:

Paul Manafort, whose firm represented Zibimbi, can offer clients more than friends in high places. He is in a high government place himself. Manafort is on the Board of Directors of OPIC, a U.S. government agency that makes loans and loan guarantees to foreign businesses.

Manafort represents some countries that want to see that OPIC money, such as, the Bahamas, Peru, the Dominican Republic, and recently a business group close to Ferdinand Marcos.

In 1985, Manafort's firm had contracts worth over \$2.4 million, and in that same year businesses in those countries got \$51.8 million. Manafort told CBS News that he officially withdrew from any OPIC discussions of decisions involving his clients. CBS News was told today that a U.S. government agency was beginning to investigate.

On May 14, 1986 [REDACTED] discussed the issue of the potential violation of 18 U.S.C. § 219 by Manafort which [REDACTED] summarized in a memorandum to Shanks dated May 16, 1986. That day Manafort resigned in a letter to the President, and the same day [REDACTED] sent a letter to [REDACTED], AAG, Criminal Division, Department of Justice referring the Manafort matter for our review and consideration.

#### ANALYSIS

The first question posed by these facts is whether Manafort was required to register personally, or only his firm. Manafort maintained strongly, in his contacts with the White House and the Department, that only his firm, and not he personally, was required to register. A review of the public file and the inspection reports certainly confirms the fact that, in general, Manafort's role was client relations rather than political activities. Thus, most references to Manafort in the file are reports by staffers to him or memoranda from him to clients of things the firm has done. It is on this basis that Manafort maintains that he has no personal obligation to register.

Manafort's argument highlights that portion of the legislative history which states that a "political consultant" need not register unless involved in political activities. However, Manafort did lobby for Saudi Arabia in the summer of 1984; did send [REDACTED] a letter regarding Curacao's position on the Tax Reform Act on May 5, 1986; did promote the Saudi view regarding the arms sale in several conversations with columnist [REDACTED] in April 1986; and did give interviews in February, 1986 to Time and Newsweek regarding the Philippines. In short, while there may be some theoretical case in which a person can serve as a political consultant and not engage in political activities, this is not such a case. Manafort should have filed short forms for the Curacao and Philippine contracts as a hands on participant. Manafort cannot maintain that he personally was not required to register.

The second question posed is whether Manafort violated his position of trust and responsibility to the United States by simultaneously becoming a foreign agent. The gravamen of the section 219 offense is using public office to gain favorable treatment for a foreign client, and its purpose is to ensure that U.S. officials not accept compensation from foreign sources for their government work. This standard separates the conceded technical, status offense from a prosecutable one. In the category of technical offenses are his status as agent for Barbados, Curacao, St. Lucia, Nigeria, UNITA, and [REDACTED] because no issue involving these principals came before the OPIC Board. Also not prosecutable under this standard are those agreements to act as agent after participating in a matter affecting the country, like Peru, Saudi Arabia, and the Philippines, absent evidence that Manafort was a secret agent at the time of the vote benefiting the country, or that the vote was in anticipation of that later contract, neither of which appears in this case. This leaves as a possible prosecutable offense Manafort's status as agent for the Bahamas, Saudi Arabia and the Dominican Republic, where matters involving these countries before OPIC arose while he was simultaneously agent and director. In the Dominican Republic case, Manafort recused himself on advice from [REDACTED] and in the Saudi Arabian case he was absent and did not otherwise participate. In the case of the Bahamas, Manafort was invited by [REDACTED] of his firm to intervene in an OPIC staff decision regarding whether an investment mission would visit the Bahamas, but Manafort declined to do so. There is, in short, no concrete conflict.

Finally, any prosecution of Manafort must overcome obstacles based on the waiver provision of Section 219. First, Manafort was advised by [REDACTED] that either a waiver under Section 219 or a recusal from matters affecting the Dominican Republic would solve his Section 219 problems, and he acted in reliance on that legal advice. Second, the failure of White House personnel to force Manafort's resignation until May 16, 1986 strengthens his contention that he thought their



advice on conflicts was politically driven, and not legally required. Third, since White House personnel had knowledge of Manafort's status as an agent and failed to request his resignation sooner, Manafort could argue that this constituted implicit approval of or, at least, acceptance of his status as an agent.

CONCLUSION

The case against Manafort is technical, and not at all appealing. Because of his good faith reliance on the OPIC legal advice and the lack of follow through and coordination by the White House and the Justice Department, a prosecution of Manafort appears to be fundamentally unfair. For these reasons the prosecution should be declined and the investigation closed.

A letter returning the White House documents, and letters to [REDACTED] his attorneys, declining prosecution are attached for your approval. Also attached is a letter to current [REDACTED] advising him of the declination of [REDACTED] referral.

# **EXHIBIT 926**

**Version - Original Signatures**

**DMP International, LLC**

**FARA Reg. 6440**

U.S. Department of Justice  
Washington, DC 20530

**Registration Statement**  
**Pursuant to the Foreign Agents Registration Act of**  
**1938, as amended**

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**I--REGISTRANT**

1. Name of Registrant

DMP International, LLC

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2. Registration No. (To Be Assigned By the FARA Registration Unit)

6440

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3. Principal Business Address

10 St. James Drive  
Palm Beach Gardens, FL 33418

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4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

(b) Other business address(es), if any

(c) Nationality

(d) Year of birth

(e) Present citizenship

(f) If present citizenship not acquired by birth, state when, where and how acquired

(g) Occupation

NSD/CES/REGISTRATION UNIT  
2017 JUN 27 PM 4:52

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5. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee ☐ Association ☐ Partnership ☐ Voluntary group ☐

Corporation ☒

Other (specify) \_\_\_\_\_

(b) Date and place of organization June 29, 2011 Delaware

(c) Address of principal office 10 St. James Drive  
Palm Beach Gardens, FL 33418

(d) Name of person in charge Paul J. Manafort

(e) Locations of branch or local offices

(f) If a membership organization, give number of members

(PAGE 2)

(g) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address(es)	Position	Nationality
Paul J. Manafort	10 St. James Drive Palm Beach Gardens, FL 33418	Principal	USA

(h) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Paul Manafort

(i) Describe the nature of the registrant's regular business or activity.

Business and political consulting firm.

(j) Give a complete statement of the ownership and control of the registrant.

LLC wholly owned by Paul J. Manafort.

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6. List all employees who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address(es)	Nature of Services
Richard W. Gates, III	206 Virginia Avenue Richmond, VA 23226	Strategic advice and counsel.

**II--FOREIGN PRINCIPAL**

7. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

Foreign Principal  
Ukrainian Party of Regions

Principal Address(es)  
3/5 Kudrinskaya Street  
Kyiv, Ukraine 04053

**III--ACTIVITIES**

8. In addition to the activities described in any Exhibit B to this statement, will you engage or are you engaging now in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

**IV--FINANCIAL INFORMATION**

9. (a) **RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of your obligation to register<sup>2</sup> to the time of filing this statement, did you receive from any foreign principal named in Item 7 any contribution, income, or money either as compensation or for disbursement or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.<sup>3</sup>

Foreign Principal	Date Received	Purpose	Amount
Please see accompanying Supplemental Statements			

Total

<sup>1</sup> The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

<sup>2</sup> An agent must register within ten days of becoming an agent, and before acting as such.

<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

**(b) RECEIPTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register<sup>4</sup> to the time of filing this statement, did you receive from any foreign principal named in Item 7 anything of value<sup>5</sup> other than money, either as compensation, or for disbursement, or otherwise? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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**10. (a) DISBURSEMENT-MONIES**

During the period beginning 60 days prior to the date of your obligation to register<sup>6</sup> to the time of filing this statement, did you spend or disburse any money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
	Please see accompanying Supplemental Statements		

**(b) DISBURSEMENTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register<sup>7</sup> to the time of filing this statement, did you dispose of any thing of value<sup>8</sup> other than money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of your obligation to register<sup>9</sup> to the time of filing this statement, did you, the registrant, or any short form registrant, make any contribution of money or other thing of value from your own funds and on your own behalf 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? Yes ☒ No ☐

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
		Please see accompanying Supplemental Statements	

4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

**V--INFORMATIONAL MATERIALS<sup>10</sup>**

11. Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

12. Identify each such foreign principal.

13. Has a budget been established or specified sum of money allocated to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount and for what period of time.

14. Will any public relations firms or publicity agents participate in the preparation or dissemination of such informational materials? Yes ☐ No ☒

If yes, furnish the names and addresses of such persons or firms.

15. Activities in preparing or disseminating informational materials will include the use of the following:

- ☐ Radio or TV broadcasts      ☐ Magazine or newspaper      ☐ Motion picture films      ☐ Letters or telegrams  
☐ Advertising campaigns      ☐ Press releases      ☐ Pamphlets or other publications      ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☐ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media website URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

16. Informational materials will be disseminated among the following groups:

- |  |   |
|--|---|
| <input type="checkbox"/> Public officials    | <input type="checkbox"/> Civic groups or associations |
| <input type="checkbox"/> Legislators         | <input type="checkbox"/> Libraries                    |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Educational groups           |
| <input type="checkbox"/> Newspapers          | <input type="checkbox"/> Nationality groups           |
| <input type="checkbox"/> Editors             | <input type="checkbox"/> Other (specify) _____        |

17. Indicate language to be used in the informational materials:

- ☐ English      ☐ Other (specify) \_\_\_\_\_

<sup>10</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.



**VI--EXHIBITS AND ATTACHMENTS**

18. (a) The following described exhibits shall be filed with an initial registration statement:

- Exhibit A-* This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 7.
- Exhibit B-* This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.
- (b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).
- (c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

**VII--EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>11</sup>)

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<sup>11</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

U.S. Department of Justice

Washington, DC 20530

**Exhibit A to Registration Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name and Address of Registrant DMP International, LLC 10 St. James Drive Palm Beach Gardens, FL 33418		2. Registration No. <b>6440</b>
3. Name of Foreign Principal Ukrainian Party of Regions	4. Principal Address of Foreign Principal 3/5 Kudriavskaya Street Kyiv, Ukraine 04053	
5. Indicate whether your foreign principal is one of the following: <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Government of a foreign country<sup>1</sup>  <input checked="" type="checkbox"/> Foreign political party  <input type="checkbox"/> Foreign or domestic organization: If either, check one of the following:  <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Partnership  <input type="checkbox"/> Corporation  <input type="checkbox"/> Association  <input type="checkbox"/> Individual-State nationality </div> <div> <input type="checkbox"/> Committee  <input type="checkbox"/> Voluntary group  <input type="checkbox"/> Other (specify) _____ </div> </div> </div> </div>		
6. If the foreign principal is a foreign government, state: a) Branch or agency represented by the registrant  b) Name and title of official with whom registrant deals		
7. If the foreign principal is a foreign political party, state: a) Principal address 3/5 Kudriavskaya Street Kyiv, Ukraine 04053  b) Name and title of official with whom registrant deals Vladimir Rybak, First Deputy Head, Party of Regions  c) Principal aim Decentralization of power with transfer of maximum authority to the regions, build a Western democratic political party, turn Ukraine into the most attractive state for investment in the region.		

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<sup>1</sup> "Government of a foreign country," as defined in Section 1(c) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.



8. If the foreign principal is not a foreign government or a foreign political party:

a) State the nature of the business or activity of this foreign principal.

b) Is this foreign principal:

Supervised by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input type="checkbox"/>
Owned by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input type="checkbox"/>
Directed by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input type="checkbox"/>
Controlled by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input type="checkbox"/>
Financed by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input type="checkbox"/>
Subsidized in part by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/> No <input type="checkbox"/>

9. Explain fully all items answered "Yes" in Item 8(b). *(If additional space is needed, a full insert page must be used.)*

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10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

#### EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit A to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date of Exhibit A	Name and Title	Signature
6-22-17	PAUL MAWAFORT	

U.S. Department of Justice

Washington, DC 20530

**Exhibit B to Registration Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**

**INSTRUCTIONS.** A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, 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 acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

**Privacy Act Statement.** The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant  DMP International, LLC	2. Registration No.  6440
3. Name of Foreign Principal  Ukrainian Party of Regions	

Check Appropriate Box:

4. ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. ☒ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Focused on electing Party of Regions' candidates at the national and regional levels in the Ukraine by implementing pro-democratic campaign activities, engaging in party building activities, developing a party platform and political agenda, and implementing election planning, election integrity, and international election monitoring programs. Communicated with the U.S. Embassy regarding developing events in the Ukraine.

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West. Provided advice to the European Centre for a Modern Ukraine, which was also working for the same purpose.



8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Focused on electing Party of Regions' candidates at the national and regional levels in the Ukraine by implementing pro-democratic campaign activities, engaging in party building activities, developing a party platform and political agenda, and implementing election planning, election integrity, and international election monitoring programs. Served as source of information for the U.S. Embassy in Kiev regarding developing events in the Ukraine.

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West. Provided advice to the European Centre for a Modern Ukraine, which was also working for the same purpose.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.


Provided strategic counsel and advice to members of the Party of Regions regarding certain interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West.

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### EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit B to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date of Exhibit B	Name and Title	Signature
6-27-17	PAUL J. MANFROT	

Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

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**OPERATING AGREEMENT OF DMP INTERNATIONAL, LLC**

This Operating Agreement ("Agreement") of DMP International, LLC (DMPI), a Delaware Limited Liability Company, is effective as of the 1<sup>st</sup> day of September 2011 ("Effective Date") between the Members.

**WITNESSETH**

The Members wish to establish this Operating Agreement for the governance of the Company.

NOW THEREFORE in consideration of the foregoing, the mutual covenants and agreements contained herein and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, all of the Members of the Company hereby acknowledge and agree to the following:

**SECTION I  
FORMATION AND PURPOSE**

The Company was formed pursuant to the Delaware Limited Liability Company Act, as may be amended from time to time (the "Act").

Each Member confirms and agrees to its status as Member, its Membership Class, and subscribes to the acquisition of a Membership Interest upon the terms and conditions set forth in this Agreement.

Each Member hereby executes and adopts this Agreement as the Operating Agreement of the Company, pursuant to the Act. The Members and the Company hereby agree that the duties and obligations imposed on the Members of the Company shall be those set forth in this Agreement, which is intended to govern the relationship among the Company and the Members, notwithstanding any provision of the Act or common law to the contrary.

**1. Name.**

The name of the Company is DMPI. All Company business must be conducted in the name of the Company. Title to all assets of the Company shall be held in the name of the Company.

**2. Principal Office.**

The principal office of the Company shall be 10 St. James Drive, Palm Beach Gardens, FL.

**3. Governing Law.**

This Agreement and all issues regarding the rights and obligations of the Members, the construction, enforcement and interpretation hereof, and the formation, administration and termination of the Company shall be governed by the provisions of the Act and other applicable laws of the State of Delaware, without reference to conflict of laws principles.

**4. Purposes.**

The Company has been formed for the purpose of transacting any and all lawful business for which limited liability companies may be organized under the Act.

**5. Registered Agent and Office.**

The registered agent for the service of process and the registered office shall be that person and that office location reflected in the Articles of Organization as filed with the Delaware Secretary of State. The Managing Member(s), may, from time to time, change the registered agent or office through appropriate state filings. In the event the registered agent ceases to act as such for any reason or the registered office shall change, the Managing Member(s) shall promptly designate a replacement registered agent or file a notice of change of address as the case may be.

**SECTION II  
STATUS, CLASSES, RIGHTS AND OBLIGATIONS OF MEMBERS**

**1. Members.**

There shall be one class of members: At the time of the execution of this Agreement, the following are the Class A Members of the Company:

Paul J. Manafort

The term "Member" as used herein, when it is not used with a specific Class designation, refers to a Class A Member.

**2. Notice of Address and Membership Interest.**

The notice of the address of the Members are set forth on Attachment A. The Members each agree that each Member's percentage of ownership interest ("Membership Interest") as well as the Class of the Membership Interest, shall be set forth on Exhibit A as may be amended from time to time pursuant to this Agreement.

**3. Voting.**

Only Class A Members are entitled to vote on any matters. Class A Members shall vote in proportion to their respective Membership Interests. Unless otherwise provided herein, for the purposes of this Agreement, any action requiring a vote, consent, or approval of a majority of the outstanding Class A Membership Interests shall be authorized if Class A

Members holding more than fifty percent of the outstanding Class A Membership Interests, vote for, consent to or approve, such action.

**4. Action Without a Meeting.**

Any action required or permitted to be taken at a meeting of the Class A Members may be taken without a meeting if the action is taken by Class A Members holding all of the outstanding Class A Membership Interests entitled to vote. Such an action without meeting shall be evidenced by a written consent signed by all Class A Members as required and filed with the Company's records.

**5. Conflicts of Interest.**

A Member does not violate a duty or obligation to the Company merely because the Member's conduct furthers the Member's own interest. A Member may lend money to and transact other business with the Company. The rights and obligations of a Member who lends money to or transacts business with the Company are the same as those of a person who is not a Member, subject to applicable law. No transaction with the Company shall be voidable solely because a Member has either a direct or indirect interest in the transaction if either the transaction is fair to the Company, or if, knowing the material facts of the transaction, the majority of the Class A Members authorize, approve or ratify the transaction.

**6. Other Activities.**

Except as otherwise provided herein, any Member may engage in or possess any interest in other businesses of any nature and description, independently or with others and neither the Company nor any Member shall have any rights in or to any such independent venture or the income or profits derived therefrom, provided, however, that no Member shall engage in any independent venture or opportunity which competes with the business of the Company unless he has first presented such opportunity to the Company and a majority of the Class A Members have voted to decline such business opportunity on behalf of the Company.

**7. Right to Transfer Membership Interest.**

No Class A Member shall have the right to transfer, hypothecate, mortgage, sell, exchange, assign or otherwise dispose of or grant an interest in (collectively "transfer") all or part of his Membership Interest to a third party or parties, including the Member's interest in any part of the Company's assets, receivables, records, documents records, files or clientele, all such rights and interests of such Member being personal to him and not transferable and not assignable. Nothing herein shall prevent a Class A from selling back to the Company all or a portion of its Membership Interest under the terms of an option contained in a written Agreement with the Company.



Notwithstanding the foregoing, each Member agrees not to transfer all or any part of a Membership Interest (or take or omit any action, filing election or other action which could result in a deemed transfer) if such transfer (either considered alone or in the aggregate with prior transfers by other Members) would result in the termination of the Company for Federal Income tax purposes. Such transfer is void ab initio.

**8. Liability of Members.**

No Member shall be liable as such for the liabilities of the Company. The failure of the Company to observe any formalities or requirements relating to the exercise of its powers or management of its business or affairs under this Agreement or the Act shall not be grounds for imposing personal liability on any of the Members.

**9. Indemnification.**

The Company shall indemnify the Members for all costs, losses, liabilities and damages paid or accrued by such Member in connection with the business of the Company for acts or omissions which do not violate the standard of care set forth immediately below.

**10. Members' Standard of Care.**

Each Member's duty of care in the discharge of the Member's duties to the Company and the other Members, including the duty of the Managing Member(s), is limited to refraining from engaging in grossly negligent or reckless conduct, intentional misconduct, or a knowing violation of law. Members shall be fully protected in relying in good faith upon the records of the Company and upon such opinions reports or statements made by other Members or other person as to matters the Member reasonably believes to be in that person's professional or expert competence.

**11. Miscellaneous Member Obligations.**

It shall be the duty of each Member to act at all times consistently with and in compliance with all and each of the provisions of this Agreement and with all policies, rules, and decisions of the Company adopted in accordance with the provisions of this Agreement.

**SECTION III  
MANAGEMENT BY MANAGING MEMBER**

**1. Managing Member(s).**

There shall be one Managing Member (also referred to herein as "Manager"). Only a Class A Member may be a Managing Member. All decisions concerning the business affairs of the Company shall be made by the Managing Member.

The initial Managing Member, any one of whom has the authority individually and without the signature of the other Managing Member, to bind the company, shall be:

Paul J. Manafort

Any vacancy in the office of the Manager shall be filled by vote of the Majority of Class A Members.

**2. Term of Managing Member(s).**

Each Managing Member shall serve until the earliest of:

- (a) The Withdrawal of such Managing Member;
- (b) The Resignation of such Managing Member;
- (c) Removal of the Managing Member as provided for by this Agreement; or
- (d) The election and qualification of the Managing Member's successor by a Majority of the Class A Members.

**3. Authority of Members to Bind the Company.**

Only the Managing Member and agents of the Company authorized by the Managing Member shall have the authority to bind the Company. No Member who is not either a Managing Member or otherwise specifically authorized by a Managing Member in writing to act as an agent shall take any action to bind the Company, and each Member shall indemnify the Company for any costs or damages incurred by the Company as a result of the unauthorized action of such Member. Each Managing Member has the power, on behalf of the Company, to do all things necessary or convenient to carry out the business and affairs of the Company.

**4. Agents of the Company**

Unless stated otherwise herein, the Managing Member designates and authorizes Richard W. Gates as an authorized agent to act in all respects on behalf of the Company.

**5. Third Party Reliance.**

Notwithstanding the failure of the Managing Members to reach a consensus on any management matter, no person dealing with the Company shall have any obligation to inquire into the power or authority of any Managing Member acting on behalf of the Company when that act is for the purpose of apparently carrying on the usual business or affairs of the Company, including the exercise of the authority indicated herein.

**6. Removal of Managing Member.**

A Managing Member may be removed by the affirmative vote of a Majority of the Class A Members, for cause only. "For cause" means willful misconduct or fraud.

**SECTION IV**  
**CAPITAL CONTRIBUTIONS AND FINANCIAL OBLIGATIONS OF MEMBERS**

**1. Initial Capital Contributions.**

The capital contributions of the Members are as set forth on Attachment A. Such capital may be used for any lawful purpose.

**2. Additional Contributions.**

The Managing Member may arrange for the provision of such additional funds as are deemed necessary to conduct the Company's business. Such additional funds may be raised by loan to the Company from an outside source or by a loan or capital contribution to the Company by one or more Members.

**3. No Interest On Contributions.**

No Member shall be entitled to interest on his capital contribution.

**4. Return of Capital Contributions.**

No Member shall be entitled to withdraw any part of his capital contribution or capital account or to receive any distribution from the Company, except as specifically provided for in this Agreement. Except as otherwise provided herein there shall be no obligation to return to any Member or withdrawn Member any part of such Member's Capital contributions to the Company for so long as the Company remains in existence. If the Company is continued by unanimous consent of the remaining Members following the death, disability or withdrawal of a Member, the former Member shall continue to receive the share of the distributions and return of capital at such time and in such manner as such party would have received the distributions had such former party remained a member of the Company.

**5. Loans Not to be Treated as Capital Contributions.**

Loans or advances by any Member to the Company shall not be considered capital contributions and shall not increase the capital account balance of the lending or advancing Member.

**6. Limited Liability.**

Except as otherwise provided in this Agreement, no Member shall be required under any circumstances to contribute or lend money or property to the Company.

**7. Guaranty of Company Indebtedness.**

A Member shall not be obligated to guarantee the Company indebtedness or other contractual obligations unless he agrees to do so.

**8. No Third Party Beneficiaries.**

The provisions of this Agreement relating to the financial obligations of Members are not intended for the benefit of any creditor or other person to whom any debts, liabilities or obligations are owed by or who otherwise have any claim against the Company or any of the Members, and, except for Members, no creditor or other person shall obtain any right under any such provisions or shall by reason of any such provisions make any claim with respect to any debt, liability or obligation (or otherwise) against the Company or any of its Members.

**SECTION V  
DISTRIBUTION OF CASH AND PROPERTY**

**1. Distribution of Net Cash Flow.**

The term "net cash flow" for a fiscal year shall mean:

All cash receipts as shown on the books of the Company (excluding, however, capital contributions from members, net proceeds to the Company from the sale or the disposition of substantially all of the assets, condemnation process, and excess title, property, casualty, or liability insurance proceeds, if any, for the restoration or repair of the Company assets), reduced by cash disbursements for Company purposes including interest and principal upon loans, and cash reserves set aside by the Managing Members which the Managing Members deem necessary in their discretion to accomplish the Company's business purpose, plus any other funds, including the amounts previously set aside as reserves for distribution as net cash flow.

**2. Priority of Distribution.**

The net cash flow of the Company for a fiscal year shall be paid out to the Members pro rata in accordance with their respective Membership Interests at such time as the Managing Member(s) determines.

**3. Distribution of the Proceeds of Dissolution.**

If the Company dissolves, the net proceeds of dissolution, including any accompanying sale of Company assets, shall be distributed in the following order of priority:

First, toward the satisfaction of all outstanding debts and other obligations of the Company, including Members, who are creditors, then pro rata among those members with a positive capital account balance, after adjustments for the above distributions, and tax allocations for the current fiscal year, in proportion to their respective capital accounts.

## **SECTION VI FEDERAL AND STATE TAX MATTERS**

### **1. Maintenance of Members' Capital Accounts.**

With respect to each Member a separate "Capital Account" for such Member shall be established and maintained throughout the full term of the Company in accordance with applicable Treasury Regulations that must be complied with in order for the allocations of taxable profits and losses provided in this Agreement to have an economic effect under applicable Treasury Regulations.

### **2. Allocations of Profits and Losses of the Company.**

The Company's net income or loss for a fiscal year computed in accordance with applicable federal income tax accounting principles shall be allocated among the Members in accordance with their respective Membership Interests.

### **3. Special Tax Allocation.**

Notwithstanding anything to the contrary contained in this Agreement, the Company shall comply with IRS Section 704 and Treasury Regulation section 1.704 with respect to all applicable tax allocations.

### **4. Tax Year and Accounting Matters.**

The taxable year of the Company shall be the calendar year. The Company shall adopt such methods of accounting and file its tax returns using the methods of accounting determined upon the advice of the accountant servicing the books and records of the Company.

### **5. Tax Elections.**

The Company may make or revoke all tax elections provided for under the Internal Revenue Code upon a decision by the Manager(s) on the advice of the accountant servicing the books and records of the Company.

## **SECTION VII TERM AND TERMINATION OF THE COMPANY**

### **1. Term of the Company.**

The term of the Company commenced upon the filing of the Certificate of Formation with the Delaware Secretary of State and shall continue in perpetuity, unless sooner dissolved and terminated as provided in this Agreement.

### **2. Events of Termination.**

The Company shall be dissolved upon the occurrence of any of the following events:

- (a) The determination in writing of the Managing Members to dissolve and terminate the Company;
- (b) The sale, transfer or assignment of all or substantially all of the assets of the Company;
- (c) The adjudication of the Company as insolvent or the filing of an involuntary petition in bankruptcy, or reorganization, against the Company which is not dismissed within 90 days, or the appointment for the company of a temporary or permanent receiver, trustee, custodian and such receiver, trustee or custodian is not dismissed within 90 days;
- (d) Entry of a decree of dissolution;
- (e) The death, retirement, dissolution, termination, resignation, insanity, insolvency of a Member, unless within 6 months of such event the Class A Members by a majority agree to continue the company and, if the death is that of a Managing Member, select a new Managing Member, in which event the Company shall not be dissolved and the Company business shall be continued.
- (f) When so determined in accordance with other specific provisions of this Agreement;
- (g) As otherwise required by applicable law.

### **3. Conclusion of Affairs.**

In the event of a dissolution of the Company for any reason, the Members shall proceed promptly to wind up the affairs and liquidate the Company. Except as otherwise provided in the Agreement, the Members shall continue to share in the distributions and the tax allocations during the period of liquidation in the same manner as before the dissolution. After paying or providing for the payment of all debts and liabilities of the Company and all expenses of liquidation, the proceeds of liquidation shall be distributed to or for the benefit of Members in accordance with this Agreement.

### **4. Liquidating Distributions.**

After paying for or providing for the payment of all debts or liabilities of the Company and all the expenses of liquidation, and subject to the setting up of reserves the majority of Class A Members deem necessary for any contingent or unforeseen liabilities or obligations of the Company, the proceeds of the liquidation and any other assets of the Company shall be distributed of the benefit of the Members in accordance with this Agreement.

### **5. Termination.**

Within a reasonable time following the completion of the liquidation of the Company, the Company shall terminate and any Member shall have the authority to execute and file with any appropriate state authority a Certificate of Cancellation of the Company or any similar documentation required by such authority.

**SECTION VIII  
ADMISSION AND WITHDRAWAL OF MEMBERS**

**1. Admission.**

No Member shall be added without unanimous written consent of the Managing Members.

**2. Expulsion.**

Any Member may be expelled from the Company by action of the Class A Members holding a majority of the outstanding Membership Interests entitled to be voted, upon a default of such Member of any of his obligations hereunder, if such default continues for a period of 30 days after notice thereof is given to him by the Company.

**3. Withdrawal.**

No Member shall have the right to voluntarily resign or otherwise withdraw from the Company without the unanimous written consent of the Managing Member.

Notwithstanding the consent to withdraw, no member shall be entitled to receive any compensation or distribution with respect to the withdrawal, except as otherwise provided herein.

**4. Effect of Withdrawal or Expulsion.**

On and as of the effective date of withdrawal or expulsion from the Company under the provisions of this Agreement, such former Member shall cease to have any Membership Interest, or other rights, status or privileges of a Member, but such former Member shall not be released or discharged from any of the obligations of a Member under the provisions of this Agreement, unless provided in the written consent of Members holding all of the outstanding Class A Membership Interests entitled to be voted.

**5. Purchase of Membership Interests Upon Expulsion, Withdrawal or Death of Member.**

Upon the Expulsion, Withdrawal or Death of a Member, that Member's Membership Interest shall be purchased by the Company for a purchase price equal to the Fair Market Value of the Member's Interest. The Fair Market Value shall be determined by agreement between the Member (or his Personal Representative) and the Company, which agreement is subject to unanimous approval of the remaining Class A Members of the Company. If an agreement with respect to Fair Market Value cannot be reached within 60 days of the death, withdrawal or expulsion, the Fair Market Value shall be determined by appraisal. The Class A Members and the Member (or his personal representative) shall choose an appraiser and the two appraisers shall choose a third appraiser. The decision of the Majority of the appraisers as to the fair market value of the Membership Interests shall be final and binding. Each party shall pay for its/his appraiser and the third appraiser fee shall be shared by the both parties.

## **SECTION IX ADMINISTRATIVE PROVISIONS**

### **1. Books, Records, Accounts.**

The Manager(s) shall cause faithful books and records to be kept using standard accounting procedures when applicable. The books and records shall be kept in the Company's principal office. Only the Manager(s) shall be signatory on the bank accounts of the Company.

### **2. Notice.**

Unless otherwise provided herein, any offer, acceptance, election, approval consent, certification, request, waiver, notice or other communication required or permitted to be given hereunder (collectively "Notice") shall be given by enclosing same in an envelope addressed to the Member to whom the Notice is to be given and deposited in the US Mail postage prepaid to the Member at such address listed in Attachment A, or at such other address as requested by the Member.

## **SECTION X ARBITRATION**

Any matter that arises involving the performance or interpretation of this Operating Agreement that the Members are unable to settle by mutual agreement, or arises as the result of an unsuccessful mediation as required in the case of a management dispute between the Managing Members, shall be settled by a panel of three Arbitrators. One Arbitrator shall be appointed by each managing Member and the third Arbitrator shall be appointed by the two appointed Arbitrators. The arbitration proceeding shall be conducted in accordance with the prevailing Commercial Arbitration Rules and Regulations of the American Arbitration Association. The decision of a majority of said Arbitrators shall be final and binding on all parties to this Agreement. The decision so rendered may be entered in any court having jurisdiction. The Arbitrators shall not have authority to award punitive or other non-compensatory damages to any party. Each party shall bear its own costs and expenses of the arbitration; the costs and expenses of the arbitrators and the administrative costs of the arbitration will be equally shared by the parties.

## **SECTION IX MISCELLANEOUS PROVISIONS**

### **1. Amendment.**

This Agreement, including any Attachments attached hereto, represent the entire Agreement of the Members with respect to the matters covered herein. Except as provided by law or otherwise provided herein, this Agreement shall only be amended by unanimous written consent of the Class A Members.



**2. Interpretation.**

Whenever the context may require, any noun or pronoun used herein shall include the corresponding masculine, feminine or neuter forms. The singular form of nouns, pronouns and verbs shall include the plural, and vice versa.

**3. Severability.**

Each provision of this Agreement shall be considered severable. If for any reason any provision or provisions hereof are determined to be invalid or contrary to existing or future law, such invalidity shall not impair the operation or affect those portions of this Agreement which are valid, and the Agreement shall remain in full force and effect and shall be construed and enforced in all respects as if such invalid or unenforceable provision or provisions had been eliminated.

**4. Further Assurances.**

Each Member hereby agrees that he shall hereafter execute and deliver such further instruments, provide all information, and take or forebear from taking such further actions and things as may be reasonably required or useful to carry out the intent and purpose of this Agreement and as are not inconsistent with the terms hereof.

IN WITNESS WHEREOF, the parties have executed this Agreement to be effective as of the date above written.

**MEMBERS:**

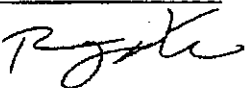
**Class A Members:**

Paul J. Manafort



BY: \_\_\_\_\_  
Paul J. Manafort, its Managing Member

**AUTHORIZED AGENT:**



BY: \_\_\_\_\_  
Richard W. Gates

**ATTACHMENT A**

Member Name/ Class/Contribution Address	Membership Interest	Initial Capital Contribution (Cash)	Initial Capital (In Kind)
Class A Member(s): Paul J. Manafort 10 St. James Drive Palm Beach Gardens, FL	100%		
<b>TOTALS</b>	<b>100%</b>		

U.S. Department of Justice

Washington, DC 20530

**Short Form Registration Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**

**INSTRUCTIONS.** Each partner, officer, director, associate, employee, and agent of a registrant is required to file a short form registration statement unless he engages in no activities in furtherance of the interests of the registrant's foreign principal or unless the services he renders to the registrant are in a secretarial, clerical, or in a related or similar capacity. Compliance is accomplished by filing an electronic short form registration statement at <https://www.fara.gov>.

**Privacy Act Statement.** The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public and online at: <https://www.fara.gov>.

**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average .429 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name Paul J. Manafort	2. Registration No. 6440
3. Residence Address(es) 10 St. James Drive Palm Beach Gardens, FL 33418	4. Business Address(es) DMP International, LLC 10 St. James Drive Palm Beach Gardens, FL 33418
5. Year of Birth 1949  Nationality USA  Present Citizenship USA	6. If present citizenship was not acquired by birth, indicate when, and how acquired. n/a
7. Occupation Attorney and Businessman	
8. What is the name and address of the primary registrant? Name DMP International, LLC Address 10 St. James Drive Palm Beach Gardens, FL 33418	
9. Indicate your connection with the primary registrant: <input checked="" type="checkbox"/> partner <input type="checkbox"/> director <input type="checkbox"/> employee <input type="checkbox"/> consultant <input type="checkbox"/> officer <input type="checkbox"/> associate <input type="checkbox"/> agent <input type="checkbox"/> subcontractor <input type="checkbox"/> other (specify) _____	
10. List every foreign principal to whom you will render services in support of the primary registrant. Ukrainian Party of Regions	
11. Describe separately and in detail all services which you will render to the foreign principal(s) listed in Item 10 either directly, or through the primary registrant listed in Item 8, and the date(s) of such services. (If space is insufficient, a full insert page must be used.) Please see attached	

12. Do any of the above described services include political activity as defined in Section 1(o) of the Act and in the footnote below?

Yes ☒ No ☐

If yes, describe separately and in detail such political activity.

Please see attached

13. The services described in Items 11 and 12 are to be rendered on a

☒ full time basis ☐ part time basis ☐ special basis

14. What compensation or thing of value have you received to date or will you receive for the above services?

☐ Salary: Amount \$ \_\_\_\_\_ per \_\_\_\_\_ ☐ Commission at \_\_\_\_\_ % of \_\_\_\_\_

☒ Salary: Not based solely on services rendered to the foreign principal(s).

☐ Fee: Amount \$ \_\_\_\_\_ ☐ Other thing of value \_\_\_\_\_

15. During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you make any contributions of money or other things of value from your own funds or possessions and on your own behalf in connection with any election to political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☐ No ☒

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
------	--------------------------	-------------------------------------	-------------------

### EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

6-27-17

(Date of signature)

*Paul J. Murphy*  
(Signature)

2017 JUN 27 PM 4:52

NSD/CES/REGISTRATION UNIT

Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Question 11

Focused on electing Party of Regions' candidates at the national and regional levels in the Ukraine by implementing pro-democratic campaign activities, engaging in party building activities, developing a party platform and political agenda, and implementing election planning, election integrity, and international election monitoring programs.

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West. Communicated with the U.S. Embassy in Kiev regarding developing events in the Ukraine.

Question 12

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West.



U.S. Department of Justice

Washington, DC 20530

**Short Form Registration Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**

**INSTRUCTIONS.** Each partner, officer, director, associate, employee, and agent of a registrant is required to file a short form registration statement unless he engages in no activities in furtherance of the interests of the registrant's foreign principal or unless the services he renders to the registrant are in a secretarial, clerical, or in a related or similar capacity. Compliance is accomplished by filing an electronic short form registration statement at <https://www.fara.gov>.

**Privacy Act Statement.** The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public and online at: <https://www.fara.gov>.

**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average .429 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name Richard W. Gates, III	2. Registration No. 6440
3. Residence Address(es) 206 Virginia Avenue Richmond, VA 23226	4. Business Address(es) DMP International, LLC 10 St. James Drive Palm Beach Gardens, FL 33418
5. Year of Birth 1972  Nationality USA  Present Citizenship USA	6. If present citizenship was not acquired by birth, indicate when, and how acquired. n/a
7. Occupation Political Consultant	
8. What is the name and address of the primary registrant? Name DMP International, LLC	Address 10 St. James Drive Palm Beach Gardens, FL 33418
9. Indicate your connection with the primary registrant: <input type="checkbox"/> partner <input type="checkbox"/> director <input checked="" type="checkbox"/> employee <input type="checkbox"/> consultant <input type="checkbox"/> officer <input type="checkbox"/> associate <input type="checkbox"/> agent <input type="checkbox"/> subcontractor <input type="checkbox"/> other (specify) _____	
10. List every foreign principal to whom you will render services in support of the primary registrant. Ukrainian Party of Regions	
11. Describe separately and in detail all services which you will render to the foreign principal(s) listed in Item 10 either directly, or through the primary registrant listed in Item 8, and the date(s) of such services. (If space is insufficient, a full insert page must be used.) Please see attached	

12. Do any of the above described services include political activity as defined in Section 1(o) of the Act and in the footnote below?

Yes ☒ No ☐

If yes, describe separately and in detail such political activity.

Please see attached

13. The services described in Items 11 and 12 are to be rendered on a

☒ full time basis

☐ part time basis

☐ special basis

14. What compensation or thing of value have you received to date or will you receive for the above services?

☐ Salary: Amount \$ \_\_\_\_\_ per \_\_\_\_\_

☐ Commission at \_\_\_\_\_ % of \_\_\_\_\_

☒ Salary: Not based solely on services rendered to the foreign principal(s).

☐ Fee: Amount \$ \_\_\_\_\_

☐ Other thing of value \_\_\_\_\_

15. During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you make any contributions of money or other things of value from your own funds or possessions and on your own behalf in connection with any election to political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☐ No ☒

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
------	--------------------------	-------------------------------------	-------------------

### EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

6/23/17  
(Date of signature)

[Signature]  
(Signature)

2017 JUN 27 PM 4:52

NSD/CES/ALB  
UNIT

Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.



Question 11

Focused on electing Party of Regions' candidates at the national and regional levels in the Ukraine by implementing pro-democratic campaign activities, engaging in party building activities, developing a party platform and political agenda, and implementing election planning, election integrity, and international election monitoring programs.

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West. Provided strategic advice to the European Centre for a Modern Ukraine, which was also working for the same purpose.

Question 12

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West. Provided strategic advice to the European Centre for a Modern Ukraine, which was also working for the same purpose.

NSD/CES/ALL INFORMATION  
UNIT  
2017 JUN 27 PM 4:52



U.S. Department of Justice  
Washington, DC 20530

**Supplemental Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**For Six Month Period Ending 6/30/2012

(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant

(b) Registration No. **6440**

DMP International, LLC

(c) Business Address(es) of Registrant

10 St. James Drive  
Palm Beach Gardens, FL 33418

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

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NSD/CES/REGISTRATION UNIT

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).**3. If you have previously filed Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.Yes ☐ No ☒If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
------	----------	-----------------------

(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
------	-------------------	-------------	----------	--------------

5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☐

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
------	-------------------	-------------	----------	--------------

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
------	------------------------	-----------------

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
------	------------------------	-------------------	-----------------

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

**II - FOREIGN PRINCIPAL**

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Have you acquired any new foreign principal(s)<sup>2</sup> during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)<sup>2</sup> whom you continued to represent during the 6 month reporting period.

Ukrainian Party of Regions

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup> Yes ☐ No ☐

Exhibit B<sup>4</sup> Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

**III - ACTIVITIES**

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

Focused on electing Party of Regions' candidates at the national and regional levels in the Ukraine for the 2012 legislative election and 2012 local elections by implementing pro-democratic campaign activities, engaging in party building activities, developing a party platform and political agenda, and implementing election planning, election integrity, and international election monitoring programs. Communicated with the U.S. Embassy in Kiev regarding developing events in Ukraine.

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West. Provided advice to the European Centre for a Modern Ukraine, which was also working for the same purpose.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> as defined below? Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Please Note: The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

<sup>5</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

**IV - FINANCIAL INFORMATION****14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Date	From Whom	Purpose	Amount
Please see attached.			

Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, have you received, as part of a fundraising campaign<sup>7</sup>, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D<sup>8</sup> to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

**(c) RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
-------------------	---------------	----------------	---------

<sup>6, 7</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

<sup>8</sup> An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

<sup>9</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
Please see attached.			

---

Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
------	-----------	-------------------	----------------	---------

**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
------	--------------------------	-------------------------------------	-------------------

<sup>10, 11</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**V - INFORMATIONAL MATERIALS**

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?<sup>12</sup>

Yes ☐ No ☒

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes ☐ No ☒

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams  
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☐ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media websites URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials ☐ Newspapers ☐ Libraries  
☐ Legislators ☐ Editors ☐ Educational institutions  
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in the informational materials:

- ☐ English ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.



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**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

6-27-17(Print or type name under each signature or provide electronic signature<sup>13</sup>)Paul J. Manafort

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<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Question 14(a) Receipts

**Please Note:** The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

Date	Foreign Principal	Purpose	Amount
1/2012	Party of Regions	Services Rendered	\$225,000.00
2/2012	Party of Regions	Services Rendered	\$1,950,000.00
3/2012	Party of Regions	Services Rendered	\$700,000.00
4/2012	Party of Regions	Services Rendered	\$1,350,000.00
5/2012	Party of Regions	Services Rendered	\$535,000.00
6/2012	Party of Regions	Services Rendered	\$650,000.00
8/2012	Party of Regions	Services Rendered	\$620,000.00
9/2012	Party of Regions	Services Rendered	\$1,280,000.00
10/2012	Party of Regions	Services Rendered	\$400,000.00
11/2012	Party of Regions	Services Rendered	\$4,399,500.00

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Question 15(a) Disbursements

**Please Note:** The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

Date	Contractor	Purpose	Amount
<b>January – June 2012</b>			
5/16/2012	Fabrizio Ward Associates LLC	Polling and surveys	\$35,000.00
6/27/2012	Rabin Strasburg LLC	Media consulting services	\$91,693.00
<b>July – December 2012</b>			
7/31/2012	Rabin Strasburg LLC	Consulting services and expenses	\$65,631.00
8/28/2012	Steven J. Brown	Political and media outreach	\$20,000.00
8/31/2012	Rabin Strasburg LLC	Media consulting services	\$74,265.00
9/4/2012	Fabrizio Ward Associates LLC	Polling and surveys	\$73,500.00
10/1/2012	Rabin Strasburg LLC	Media consulting services	\$53,899.00
10/1/2012	Steven J. Brown	Political and media outreach	\$5,000.00
10/5/2012	Christopher Spence	Election data analysis	\$10,000.00
10/5/2012	Clear Dialogue LLC	Election integrity consulting services	\$10,500.00
10/31/2012	Clear Dialogue LLC	Election integrity consulting services	\$10,500.00
10/31/2012	Rabin Strasburg LLC	Media consulting services	\$83,832.00
11/7/2012	Fabrizio Ward Associates LLC	Polling and surveys	\$35,000.00
11/7/2012	Fabrizio Ward Associates LLC	Polling and surveys	\$35,000.00
11/19/2012	Clear Dialogue LLC	Election integrity consulting services	\$12,000.00
11/19/2012	Clear Dialogue LLC	Election integrity consulting services	\$6,935.44
11/29/2012	Fabrizio Ward Associates LLC	Polling and surveys	\$35,000.00
11/29/2012	Steven J. Brown	Political and media outreach	\$5,000.00
12/28/2012	Steven J. Brown	Political and media outreach	\$5,000.00

**Other Expenses**

Purpose	Amount
<b>January – June 2012</b>	
Travel	\$648,840.83
Meals/Living Expenses	\$88,404.45
<b>July – December 2012</b>	
Travel	\$769,928.53
Meals/Living Expenses	\$99,812.72

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U.S. Department of Justice

Washington, DC 20530

**Supplemental Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**For Six Month Period Ending 12/31/2012

(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant

(b) Registration No.

DMP International, LLC

6440

(c) Business Address(es) of Registrant

10 St. James Drive

Palm Beach Gardens, FL 33418

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

- |                           |                              |                             |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship           | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation            | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

- |                          |                              |  |
|--------------------------|------------------------------|--|
| (1) Name                 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices       | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

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NSD/CES/UNIT 1-1A/08  
UNIT**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).**3. If you have previously filed Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.Yes ☐ No ☒If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
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(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☐

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
------	-------------------	-------------	----------	--------------

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
------	------------------------	-----------------

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
------	------------------------	-------------------	-----------------

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

**II - FOREIGN PRINCIPAL**

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒  
If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Have you acquired any new foreign principal(s)<sup>2</sup> during this 6 month reporting period? Yes ☐ No ☒  
If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)<sup>2</sup> whom you continued to represent during the 6 month reporting period.

Ukrainian Party of Regions

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup> Yes ☐ No ☐Exhibit B<sup>4</sup> Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

**III - ACTIVITIES**

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

Focused on electing Party of Regions' candidates at the national and regional levels in the Ukraine for the 2012 legislative election and 2012 local elections by implementing pro-democratic campaign activities, engaging in party building activities, developing a party platform and political agenda, and implementing election planning, election integrity, and international election monitoring programs. Communicated with the U.S. Embassy in Kiev regarding developing events in Ukraine.

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West. Provided advice to the European Centre for a Modern Ukraine, which was also working for the same purpose.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> as defined below? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Please Note: The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

10/30/12 Email to Ambassador John Tefft regarding U.S. statement on Ukrainian elections.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

<sup>5</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

**IV - FINANCIAL INFORMATION****14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Date	From Whom	Purpose	Amount
Please see attached.			

---

Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, have you received, as part of a fundraising campaign<sup>7</sup>, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D<sup>8</sup> to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

**(c) RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
-------------------	---------------	----------------	---------

6, 7 A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

8 An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.



**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
Please see attached.			

---

Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
------	-----------	-------------------	----------------	---------

**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
8/24/12	2500.00	Vernon Parker - Arizona State Office	

<sup>10, 11</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**V - INFORMATIONAL MATERIALS**

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?<sup>12</sup>

Yes ☐ No ☒

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes ☐ No ☒

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams  
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☐ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media websites URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials ☐ Newspapers ☐ Libraries  
☐ Legislators ☐ Editors ☐ Educational institutions  
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in the informational materials:

- ☐ English ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

6-27-17(Print or type name under each signature or provide electronic signature<sup>13</sup>)Paul J. Manafort

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<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Question 14(a) Receipts

**Please Note:** The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

Date	Foreign Principal	Purpose	Amount
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2/2012	Party of Regions	Services Rendered	\$1,950,000.00
3/2012	Party of Regions	Services Rendered	\$700,000.00
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11/2012	Party of Regions	Services Rendered	\$4,399,500.00

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Question 15(a) Disbursements

**Please Note:** The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

Date	Contractor	Purpose	Amount
<b>January – June 2012</b>			
5/16/2012	Fabrizio Ward Associates LLC	Polling and surveys	\$35,000.00
6/27/2012	Rabin Strasburg LLC	Media consulting services	\$91,693.00
<b>July – December 2012</b>			
7/31/2012	Rabin Strasburg LLC	Consulting services and expenses	\$65,631.00
8/28/2012	Steven J. Brown	Political and media outreach	\$20,000.00
8/31/2012	Rabin Strasburg LLC	Media consulting services	\$74,265.00
9/4/2012	Fabrizio Ward Associates LLC	Polling and surveys	\$73,500.00
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10/31/2012	Clear Dialogue LLC	Election integrity consulting services	\$10,500.00
10/31/2012	Rabin Strasburg LLC	Media consulting services	\$83,832.00
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11/7/2012	Fabrizio Ward Associates LLC	Polling and surveys	\$35,000.00
11/19/2012	Clear Dialogue LLC	Election integrity consulting services	\$12,000.00
11/19/2012	Clear Dialogue LLC	Election integrity consulting services	\$6,935.44
11/29/2012	Fabrizio Ward Associates LLC	Polling and surveys	\$35,000.00
11/29/2012	Steven J. Brown	Political and media outreach	\$5,000.00
12/28/2012	Steven J. Brown	Political and media outreach	\$5,000.00

**Other Expenses**

Purpose	Amount
<b>January – June 2012</b>	
Travel	\$648,840.83
Meals/Living Expenses	\$88,404.45
<b>July – December 2012</b>	
Travel	\$769,928.53
Meals/Living Expenses	\$99,812.72

U.S. Department of Justice

Washington, DC 20530

**Supplemental Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**For Six Month Period Ending 6/30/2013

(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant

(b) Registration No. **6440**

DMP International, LLC

(c) Business Address(es) of Registrant

10 St. James Drive

Palm Beach Gardens, FL 33418

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

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NSD/CES/REGISTRATION UNIT

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).**3. If you have previously filed Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.Yes ☐ No ☒If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
------	----------	-----------------------

(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
------	-------------------	-------------	----------	--------------

5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
------	-------------------	-------------	----------	--------------

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
------	------------------------	-----------------

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
------	------------------------	-------------------	-----------------

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.



**II - FOREIGN PRINCIPAL**

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Have you acquired any new foreign principal(s)<sup>2</sup> during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)<sup>2</sup> whom you continued to represent during the 6 month reporting period.

Ukrainian Party of Regions

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup> Yes ☐ No ☐

Exhibit B<sup>4</sup> Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☒

If no, please attach the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

**III - ACTIVITIES**

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

Focused on electing Party of Regions' candidates at the national and regional levels in the Ukraine by implementing pro-democratic campaign activities, engaging in party building activities, developing a party platform and political agenda, and implementing election planning, election integrity, and international election monitoring programs. Communicated with the U.S. Embassy in Kiev regarding developing events in Ukraine.

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West. Provided advice to the European Centre for a Modern Ukraine, which was also working for the same purpose.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> as defined below? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Please Note: The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

3/19/13 Meeting with Paula Dobriansky, Kennedy School of Government

3/19/13 Meeting with Nadia Diuk, National Endowment for Democracy

3/19/13 Meeting with Rep. Rohrabacher

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

<sup>5</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

**IV - FINANCIAL INFORMATION****14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Date Please see attached	From Whom	Purpose	Amount
--------------------------------	-----------	---------	--------

Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, have you received, as part of a fundraising campaign<sup>7</sup>, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D<sup>8</sup> to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

**(c) RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
-------------------	---------------	----------------	---------

<sup>6, 7</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

<sup>8</sup> An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

<sup>9</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐
- (2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
Please see attached			

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**Total**

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
3/22/13	1000.00	Dana Rohrabacher	

<sup>10, 11</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**V - INFORMATIONAL MATERIALS**

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?<sup>12</sup>

Yes ☐ No ☒

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes ☐ No ☒

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams  
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☐ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media websites URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials ☐ Newspapers ☐ Libraries  
☐ Legislators ☐ Editors ☐ Educational institutions  
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in the informational materials:

- ☐ English ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

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**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>13</sup>)6-27-17Paul J. Manafort

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<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Question 14(a) Receipts

**Please Note:** The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

Date	Foreign Principal	Purpose	Amount
1/2013	Party of Regions	Services Rendered	\$400,000.00
2/2013	Party of Regions	Services Rendered	\$200,000.00
3/2013	Party of Regions	Services Rendered	\$500,000.00
4/2013	Party of Regions	Services Rendered	\$490,000.00
5/2013	Party of Regions	Services Rendered	\$355,000.00
6/2013	Party of Regions	Services Rendered	\$375,000.00
7/2013	Party of Regions	Services Rendered	\$315,000.00
8/2013	Party of Regions	Services Rendered	\$525,000.00
9/2013	Party of Regions	Services Rendered	\$415,000.00
10/2013	Party of Regions	Services Rendered	\$500,000.00
11/2013	Party of Regions	Services Rendered	\$300,000.00
12/2013	Party of Regions	Services Rendered	\$165,039.70

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Question 15(a) Disbursements

**Please Note:** The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

Date	Contractor	Purpose	Amount
<b>January – June 2013</b>			
1/4/2013	Fabrizio Ward Associates LLC	Polling and surveys	\$35,000.00
3/5/2013	Steven J. Brown	Political and media outreach	\$5,000.00
6/17/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$73,000.00
<b>July – December 2013</b>			
7/15/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$71,450.00
8/8/2013	Fabrizio Ward Associates LLC	Polling and surveys	\$30,000.00
8/8/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$73,550.00
8/30/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$65,000.00
8/30/2013	Konstantin Kilimnik	Professional services	\$15,000.00
10/3/2013	Konstantin Kilimnik	Professional services	\$15,000.00
10/3/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$53,500.00
10/30/2013	Konstantin Kilimnik	Professional services	\$15,000.00
10/30/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$38,000.00
12/13/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$21,000.00
12/13/2013	Konstantin Kilimnik	Professional services	\$15,000.00

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**Other Expenses**

Purpose	Amount
<b>January – June 2013</b>	
Travel	\$357,628.72
Meals/Living Expenses	\$83,794.14
<b>July – December 2013</b>	
Travel	\$309,193.12
Meals/Living Expenses	\$119,578.07

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U.S. Department of Justice  
Washington, DC 20530

Supplemental Statement

Pursuant to the Foreign Agents Registration Act of  
1938, as amended

For Six Month Period Ending 12/31/13

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

DMP International, LLC

(b) Registration No.

6440

(c) Business Address(es) of Registrant

10 St. James Drive  
Palm Beach Gardens, FL 33418

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

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IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).

3. If you have previously filed Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
------	----------	-----------------------

(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
------	-------------------	-------------	----------	--------------

5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
------	-------------------	-------------	----------	--------------

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
------	------------------------	-----------------

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
------	------------------------	-------------------	-----------------

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

**II - FOREIGN PRINCIPAL**

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Have you acquired any new foreign principal(s)<sup>2</sup> during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)<sup>2</sup> whom you continued to represent during the 6 month reporting period.

Ukrainian Party of Regions

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup> Yes ☐ No ☐

Exhibit B<sup>4</sup> Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

**III - ACTIVITIES**

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

Focused on electing Party of Regions' candidates at the national and regional levels in the Ukraine by implementing pro-democratic campaign activities, engaging in party building activities, developing a party platform and political agenda, and implementing election planning, election integrity, and international election monitoring programs. Communicated with the U.S. Embassy in Kiev regarding developing events in Ukraine.

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West. Provided advice to the European Centre for a Modern Ukraine, which was also working for the same purpose.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> as defined below? Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Please Note: The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

<sup>5</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

**IV - FINANCIAL INFORMATION****14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Date	From Whom	Purpose	Amount
Please see attached			

Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, have you received, as part of a fundraising campaign<sup>7</sup>, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D<sup>8</sup> to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

**(c) RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
-------------------	---------------	----------------	---------

<sup>6, 7</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

<sup>8</sup> An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

<sup>9</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐
- (2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
Please see attached			

---

Total



**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
------	--------------------------	-------------------------------------	-------------------

<sup>10, 11</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**V - INFORMATIONAL MATERIALS**

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?<sup>12</sup>

Yes ☐ No ☒

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes ☐ No ☒

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts      ☐ Magazine or newspaper      ☐ Motion picture films      ☐ Letters or telegrams  
☐ Advertising campaigns      ☐ Press releases      ☐ Pamphlets or other publications      ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☐ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media websites URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials      ☐ Newspapers      ☐ Libraries  
☐ Legislators      ☐ Editors      ☐ Educational institutions  
☐ Government agencies      ☐ Civic groups or associations      ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in the informational materials:

- ☐ English      ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

6-27-17

(Print or type name under each signature or provide electronic signature<sup>13</sup>)

Paul J. Haupt

2017 JUN 27 PM 4:52

NSD/CES/REGISTRATION  
UNIT

<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Question 14(a) Receipts

**Please Note:** The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

Date	Foreign Principal	Purpose	Amount
1/2013	Party of Regions	Services Rendered	\$400,000.00
2/2013	Party of Regions	Services Rendered	\$200,000.00
3/2013	Party of Regions	Services Rendered	\$500,000.00
4/2013	Party of Regions	Services Rendered	\$490,000.00
5/2013	Party of Regions	Services Rendered	\$355,000.00
6/2013	Party of Regions	Services Rendered	\$375,000.00
7/2013	Party of Regions	Services Rendered	\$315,000.00
8/2013	Party of Regions	Services Rendered	\$525,000.00
9/2013	Party of Regions	Services Rendered	\$415,000.00
10/2013	Party of Regions	Services Rendered	\$500,000.00
11/2013	Party of Regions	Services Rendered	\$300,000.00
12/2013	Party of Regions	Services Rendered	\$165,039.70

NSD/CES/REG  
UNIT

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Question 15(a) Disbursements

**Please Note:** The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

Date	Contractor	Purpose	Amount
<b>January – June 2013</b>			
1/4/2013	Fabrizio Ward Associates LLC	Polling and surveys	\$35,000.00
3/5/2013	Steven J. Brown	Political and media outreach	\$5,000.00
6/17/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$73,000.00
<b>July – December 2013</b>			
7/15/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$71,450.00
8/8/2013	Fabrizio Ward Associates LLC	Polling and surveys	\$30,000.00
8/8/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$73,550.00
8/30/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$65,000.00
8/30/2013	Konstantin Kilimnik	Professional services	\$15,000.00
10/3/2013	Konstantin Kilimnik	Professional services	\$15,000.00
10/3/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$53,500.00
10/30/2013	Konstantin Kilimnik	Professional services	\$15,000.00
10/30/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$38,000.00
12/13/2013	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$21,000.00
12/13/2013	Konstantin Kilimnik	Professional services	\$15,000.00

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NSD/CES/NEC-17-04  
UNIT

**Other Expenses**

<b>Purpose</b>	<b>Amount</b>
<b>January – June 2013</b>	
Travel	\$357,628.72
Meals/Living Expenses	\$83,794.14
<b>July – December 2013</b>	
Travel	\$309,193.12
Meals/Living Expenses	\$119,578.07

MSD/CES/REGISTRATION  
UNIT  
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U.S. Department of Justice

Washington, DC 20530

**Supplemental Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**For Six Month Period Ending 6/30/14

(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant

(b) Registration No. **6440**

DMP International, LLC

(c) Business Address(es) of Registrant

10 St. James Drive

Palm Beach Gardens, FL 33418

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

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NSD/CES/INSP/REG-004  
UNIT**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).**3. If you have previously filed Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.Yes ☐ No ☒If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)



4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
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(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
------	-------------------	-------------	----------	--------------

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
------	------------------------	-----------------

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
------	------------------------	-------------------	-----------------

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.



**II - FOREIGN PRINCIPAL**

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Foreign Principal  
Ukrainian Party of Regions

Date of Termination  
February 2014

8. Have you acquired any new foreign principal(s)<sup>2</sup> during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)<sup>2</sup> whom you continued to represent during the 6 month reporting period.

Ukrainian Party of Regions

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup> Yes ☐ No ☐

Exhibit B<sup>4</sup> Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

**III - ACTIVITIES**

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

Focused on electing Party of Regions' candidates at the national and regional levels in the Ukraine by implementing pro-democratic campaign activities, engaging in party building activities, developing a party platform and political agenda, and implementing election planning, election integrity, and international election monitoring programs. Communicated with the U.S. Embassy in Kiev regarding developing events in Ukraine.

Provided strategic counsel and advice to members of the Party of Regions regarding their interactions with U.S. government officials and other Western influential persons to advance the goal of greater political and economic integration between the Ukraine and the West. Provided advice to the European Centre for a Modern Ukraine, which was also working for the same purpose.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> as defined below? Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Please Note: The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

<sup>5</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

**IV - FINANCIAL INFORMATION****14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Date	From Whom	Purpose	Amount
Please see attached			

Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, have you received, as part of a fundraising campaign<sup>7</sup>, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D<sup>8</sup> to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

**(c) RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose

<sup>6, 7</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

<sup>8</sup> An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

<sup>9</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
Please see attached			

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Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
------	-----------	-------------------	----------------	---------

**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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<sup>10, 11</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**V - INFORMATIONAL MATERIALS**

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?<sup>12</sup>

Yes ☐ No ☒

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes ☐ No ☒

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts      ☐ Magazine or newspaper      ☐ Motion picture films      ☐ Letters or telegrams  
☐ Advertising campaigns      ☐ Press releases      ☐ Pamphlets or other publications      ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☐ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media websites URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials      ☐ Newspapers      ☐ Libraries  
☐ Legislators      ☐ Editors      ☐ Educational institutions  
☐ Government agencies      ☐ Civic groups or associations      ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in the informational materials:

- ☐ English      ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>13</sup>)

6-27-17

Paul J. Murphy

2017 JUN 27 PM 4:52

NSD/CES/REGISTRATION  
UNIT

<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Question 14(a) Receipts

**Please Note:** The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

Date	Foreign Principal	Purpose	Amount
1/2014	Party of Regions	Services Rendered	\$500,000.00

NSD/CES/REGISTRATION  
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Question 15(a) Disbursements

**Please Note:** The information contained in this filing, including but not limited to descriptions of activities giving rise to the Registrant's present registration and/or contemporaneous financial receipts or disbursements, reflect only Registrant's best recollection of relevant events and such records currently available, to the knowledge and belief of the Registrant, for review by the Registrant and his legal counsel. The Registrant may amend and/or supplement such disclosures should additional, relevant information become available.

Date	Contractor	Purpose	Amount
<b>January – February 2014</b>			
1/23/2014	Konstantin Kilimnik	Professional services	\$15,000.00
1/23/2014	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$39,500.00
1/28/2014	Konstantin Kilimnik	Professional services and administrative overhead for Kiev operations	\$21,000.00

**Other Expenses**

Purpose	Amount
<b>January – February 2014</b>	
Travel	\$117,818.79
Meals/Living Expenses	\$36,763.06

NSD/CES/REGISTRATION  
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# **EXHIBIT 941**

I—REGISTRANT

1. Name of the registrant.

Paul J. Manafort Attorney at Law

Reg No 3594

2. Business address.

324 North Fairfax Street, Alexandria, Virginia 22314

3. If the registrant is an individual, furnish the following information:

Not Applicable

(a) Residence address.

(b) Date and place of birth.

(c) Present citizenship.

(d) If present citizenship not acquired by birth, state when, where and how acquired.

(e) Occupation.

4. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee ☐ Association ☐ Partnership ☐

Corporation ☐ Other (specify) Law Firm

(b) Date and place of organization.

Practicing Member of Bar since October, 1977

(c) Address of principal office.

324 North Fairfax Street, Alexandria, Virginia 22314

(d) Name of person in charge.

Paul J. Manafort, Jr.

(e) Locations of branch or local offices in United States.

Not Applicable

(f) If a membership organization, give number of members.

Not Applicable

GOVERNMENT

EXHIBIT

U.S. v. MANAFORT, 1:17-cr-201 (A.B.J.)

941

(g) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

<i>Name</i>	<i>Residence Address</i>	<i>Position</i>	<i>Citizenship</i>
Paul J. Manafort, Jr.	9357 Mount Vernon Circle Alexandria, Virginia 22309	Partner	U.S.

(h) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Paul J. Manafort, Jr.

(i) Describe the nature of the registrant's regular business or activity.

General Practice of Law

(j) Give a complete statement of the ownership and control of the registrant.

Partner

---

5. List all employees who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity.

<i>Name</i>	<i>Residence Address</i>	<i>Nature of Services</i>
Wayne L. Berman	9348 Mount Vernon Circle Alexandria, Virginia 22309	Consultant

**II—FOREIGN PRINCIPAL**

6. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

*Name of Foreign Principal*

*Principal Address*

The Government of Saudi Arabia

Embassy of Saudi Arabia  
601 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

**III—ACTIVITIES**

7. In addition to the activities described in any Exhibit B to this statement, will you engage or are you now engaging in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

**IV—FINANCIAL INFORMATION****8. (a) RECEIPTS—MONIES**

During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you receive from any foreign principal named in Item 6 any contribution, income or money either as compensation or for disbursement or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.<sup>2</sup>

<i>Name of Foreign Principal</i>	<i>Date Received</i>	<i>Purpose</i>	<i>Amount</i>
The Government of Saudi Arabia	5/23/84	Fee	\$200,000.00

\$200,000.00

Total

<sup>1</sup>The term "foreign principal" includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.  
<sup>2</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. There is no printed form for his exhibit. See Rule 201(e).

**(b) RECEIPTS—THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you receive from any foreign principal named in Item 6 any thing of value<sup>3</sup> other than money, either as compensation, or for disbursement, or otherwise? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of Foreign Principal</i>	<i>Date Received</i>	<i>Description of thing of value</i>	<i>Purpose for which received</i>
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**9. (a) DISBURSEMENTS—MONIES**

During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you spend or disburse any money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 6? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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**(b) DISBURSEMENTS—THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you dispose of any thing of value<sup>3</sup> other than money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 6? Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose in giving</i>
-------------	---	--	--	------------------------------

**(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you make any contribution of money or other thing of value from your own funds and on your own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☒ No ☐

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Party or Candidate</i>	<i>Identify location of election, convention, etc. if any</i>
3/84	\$1,000.00	John Warner	Virginia
5/84	\$ 750.00	National Black Republicans	Washington, D.C.
9/83	250.00	Coreyell for County Supervisor	Fairfax, VA
10/83	500.00	Kozlowski for Mayor	New Britain, CT
7/83	1,000.00	Doug Schoen for Congress	New York City, NY
3/84	100.00	Dave Smick for Congress	Baltimore, MD

<sup>3</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment, kickbacks, and the like.

**V—POLITICAL PROPAGANDA**

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

10. Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

11. Identify each such foreign principal.

The Government of Saudi Arabia

12. Has a budget been established or a specified sum of money allocated to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount and for what period of time.

13. Will any public relations firms or publicity agents participate in the preparation or dissemination of such political propaganda material? Yes ☐ No ☒

If yes, furnish the names and addresses of such persons or firms.

14. Will your activities in preparing or disseminating political propaganda include the use of any of the following:

- |  |  |
|--|--|
| <input type="checkbox"/> Radio or TV broadcasts  | <input type="checkbox"/> Motion picture films            |
| <input type="checkbox"/> Advertising campaigns   | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Magazine or Newspaper articles  | <input type="checkbox"/> Letters or telegrams            |
| <input type="checkbox"/> Press releases  | <input type="checkbox"/> Lectures or speeches            |
| <input checked="" type="checkbox"/> Other (specify) <u>Personal discussions with Members of Legislative and Executive Branches</u> |  |

15. Will the political propaganda be disseminated among any of the following groups:

- |  |  |
|--|--|
| <input type="checkbox"/> Public Officials    | <input type="checkbox"/> Civic groups or associations                          |
| <input type="checkbox"/> Legislators         | <input type="checkbox"/> Libraries   |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Educational institutions                              |
| <input type="checkbox"/> Newspapers          | <input type="checkbox"/> Nationality groups                                    |
| <input type="checkbox"/> Editors             | <input checked="" type="checkbox"/> Other (specify) <u>Congressional Staff</u> |

16. Indicate language to be used in political propaganda:

☒ English

☐ Other (specify) \_\_\_\_\_

## VI—EXHIBITS AND ATTACHMENTS

17. (a) The following described exhibits shall be filed in duplicate with an initial registration statement:

*Exhibit A*—This exhibit, which is filed on Form CRM-157, sets forth the information required to be disclosed concerning each foreign principal named in Item 6.

*Exhibit B*—This exhibit, which is filed on Form CRM-155, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

(b) An Exhibit C shall be filed when applicable. This exhibit for which no printed form is provided consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Internal Security Division, U.S. Department of Justice, Washington, D.C. 20530. See Rule 201(c) and (d).

(c) An Exhibit D shall be filed when applicable. This exhibit for which no printed form is provided sets forth an account of money collected or received as a result of a fund raising campaign and transmitted for a foreign principal. See Rule 201(e).

(d) A Short Form Registration Statement shall be filed for each person named in Items 4(h) and 5.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

*Paul J. Manafort, Jr.*

Paul J. Manafort, Jr.

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Subscribed and sworn to before me at Alexandria, Virginia

on this 1st. day of June, 19 84

*A. S. Larson*  
(Signature of notary or other officer)

My commission expires Feb. 23, 19 86



# **EXHIBIT 945**

For Six Month Period Ending

JUN 4 1985

(Insert date)

Name of Registrant

Paul J. Manafort, Jr.

Registration No.

3594

Business Address of Registrant

324 North Fairfax Street  
Alexandria, VA 22314

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

RECEIVED  
CRIMINAL DIVISION  
JUL 3 1 51 PM '85  
INTERNAL SECURITY  
SECTION  
REGISTRATION UNIT

2. Explain fully all changes, if any, indicated in item 1.

N/A

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name  
Paul J. Manafort, Jr.

Position  
Partner

Date Connection  
Ended  
June 4, 1985

Formerly OBD-64



FORM CRM-154  
FEB. 84

DOJSCO-402206569

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?  
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?  
 Yes ☐ No ☐

If yes, identify each such person and describe his services.

N/A

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

*Name of foreign principal*

*Date of Termination*

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

The Government of Saudi Arabia

### III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

The Government of Saudi Arabia -

General advice on issues relating to energy policy, U.S. - Saudi Arabia bilateral relations, proposed U.S. - Saudi arms sale and other issues of interest.

<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?  
Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

see attachment

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

<sup>2</sup>The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States or with reference to the political or public interests, policies, or relations of a government, foreign country or a foreign political party.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

Yes   x   No           

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

-----

January 15, 1985 / 12:00 pm / Meeting  
Wayne Berman / Robert Lauterberg, Director, Gov't Relations,  
National Oil Council.

Activity: discussed petroleum products import issues.

January 31, 1985 / Meeting  
Wayne Berman (employee of Paul J. Manafort, Attorney at Law) /  
Jeffrey Bergner (Chief of Staff, Senate Foreign Relations  
Committee.

Activity: discussed Middle East security issues.

February 5, 1985 / by phone  
Wayne Berman / Jeffrey Bergner, Chief of Staff, Senate Foreign  
Relations Committee.

Activity: discussed Saudi Arabia - U.S. issues.

February 11, 1985 / 12:00 / Meeting  
Paul J. Manafort / Tony Cortesmin.

Activity: discussed proposed Saudi Arabia arms package.

February 26, 1985 / by phone  
Wayne Berman / Graham Bannerman, Deputy Chief of Staff, Senate  
Foreign Relations Committee.

Activity: discussed Saudi Arabia - U.S. Security issues.

March 11, 1985 / by phone  
Wayne Berman / Ron Neumann, Deputy Director, Saudi Arabia  
Section, Department of State.

Activity: discussed U.S. - Saudi Arabia relations, economic,  
trade and security issues, and other Middle East issues.

March 14, 1985 / Meeting  
Wayne Berman / Andy Walquist, A.A. to Senator Warner.

Activity: discussed congressional attitudes towards Saudi  
Arabia.

March 18, 1985 / by phone  
Wayne Berman / Jeff Bergner, Chief of Staff, Senate Foreign  
Relations Committee.

Activity: discussed congressional perspectives on Saudi Arabia  
security requirements.

March 21, 1985 / 1:00 / Meeting  
Wayne Berman / Al Drischler, Neill and Co.

Activity: discussed security assistance and Middle East issues.

April 1, 1985 / 12:00 / Meeting  
Wayne Berman / Jack Shaw, private consultant.

Activity: U.S. - Saudi Arabia relations.

April 7, 1985 / 12:00 / Meeting  
Wayne Berman / Graham Bannerman, Deputy Chief of Staff, Senate  
Foreign Relations Committee.

Activity: discussed general foreign policy issues in regard to  
the Middle East.

April 11, 1985 / Meeting  
Wayne Berman / Senator Lugar, Chairman, Senate Foreign Relations  
Committee.

Activity: discussed Saudi Arabia's role in Middle East peace  
process and regional security threats from Iran.

April 17, 1985 / by phone

Wayne Berman / Jeffrey Bergner, Chief of Staff, Senate Foreign Relations Committee.

Activity: Follow-up on 4/11 conversation with Senator Lugar.

April 18, 1985 / 1:00 pm / Meeting

Wayne Berman (employee of Paul J. Manafort, Atty at Law) / Jeffrey Bergner, Chief of Staff, Senate Foreign Relations Committee.

Activity: discussed Middle East security issues.

April 19, 1985 / 12:00 / Meeting

Wayne Berman / Sam Ballenger, A.A. to Senator Laxalt.

Activity: discussed congressional perspectives on Saudi Arabia.

April 29, 1985 / by phone

Wayne Berman / Russ Rourke, Assistant Secretary of Defense.

Activity: discussed U.S. - Saudi Arabia relations in a defense context.



## IV—FINANCIAL INFORMATION

## 14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
1/17/85	The Gov't of Saudi Arabia	Consulting Fee	200,000.00
5/06/85	The Gov't of Saudi Arabia	Consulting Fee	50,000.00
m 5/06/85	The Gov't of Saudi Arabia	Expense Reimbursement	702.55
			\$250,702.55
Total			

## (b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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<sup>3</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

<sup>4</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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see attachment

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Total

## 15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in items 8,9 and 10 of this statement? Yes   x   No       

(2) transmitted monies to any such foreign principal?

Yes   x   No       

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<u>DATE</u>	<u>TO WHOM</u>	<u>PURPOSE</u>	<u>AMOUNT</u>
5/84	All State Courier	Courier Service	17.50
/84	All State Courier	Courier Service	27.25
12/84	All State Courier	Courier Service	9.81
1/85	All State Courier	Courier Service	9.81
2/85	All State Courier	Courier Service	20.87
4/85	C&P Telephone	Long Distance Service on behalf of Foreign Principal, Saudi Arabia.	53.61
9/84	DC Parking Lot	Parking	6.50
1/85	DC Parking Lot	Parking	5.50
4/85	DC Parking Lot	Parking	7.00
4/23/84	Sichuan Pavilion	Lunch on behalf of Foreign Principal, Saudi Arabia, regarding Saudi Arms Package	27.45
7/26/84	The Palm Restaurant	Lunch on behalf of Foreign Principal, Saudi Arabia, regarding Saudi Arms Package	62.92
1/15/85	The Palm Restaurant	Lunch with Jeff Bergner, Chief of Staff, Senate Foreign Relations Committee, regarding Middle East Security issues.	58.95
2/11/85	The Palm Restaurant	Lunch on behalf of Foreign Principal, Saudi Arabia, regarding Saudi Arms Package	57.25
3/21/85	Duke Zeiberts	Entertainment on behalf of Foreign Principal, Saudi Arabia, regarding security assistance, Middle East issues.	13.84

<u>DATE</u>	<u>TO WHOM</u>	<u>PURPOSE</u>	<u>AMOUNT</u>
4/1/85	The Palm Restaurant	Lunch on behalf of Foreign Principal, Saudi Arabia, regarding U.S. - Saudi Arabia relations.	36.51
4/7/85	Hay Adams Restaurant	Breakfast on behalf of Foreign Principal, Saudi Arabia, regarding general foreign policy issues - Middle East.	25.33
4/18/85	Monocle Restaurant	Lunch with Sam Ballenger, A.A. to Senator Laxalt, on behalf of Foreign Principal, Saudi Arabia regarding Congressional perspectives on Saudi Arabia.	50.20
no date	Taxi	Transportation to meeting on behalf of Foreign Principal, Saudi Arabia.	2.50
TOTAL			\$492.80

## 15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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## (c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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Wayne L. Berman

2/15/85	\$1,000.00	Parris for Governor	Stan Parris
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## V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

<sup>5</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts    ☐ Magazine or newspaper articles    ☐ Motion picture films    ☐ Letters or telegrams  
☐ Advertising campaigns    ☐ Press releases    ☐ Pamphlets or other publications    ☐ Lectures or speeches

☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials    ☐ Newspapers    ☐ Libraries  
☐ Legislators    ☐ Editors    ☐ Educational institutions  
☐ Government agencies    ☐ Civic groups or associations    ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in this political propaganda:

☐ English    ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☐ No ☐

## VI—EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup>    Yes ☐    No ☐    n/a  
Exhibit B<sup>7</sup>    Yes ☐    No ☐    n/a

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐ n/a

If no, please attach the required amendment.

<sup>6</sup>The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup>The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

## 26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

n/a

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment. n/a

## 27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

x

Paul J. Manafort, Jr.

Subscribed and sworn to before me at Alexandria, Virginia

this Third day of July, 19 85

A. S. Larson

(Signature of notary or other officer)

<sup>8</sup>The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

# **EXHIBIT 949**



1. Name of Registrant	2. Registration No.
Paul J. Manafort, Attorney at Law	3594

3. This amendment is filed to accomplish the following indicated purpose or purposes:

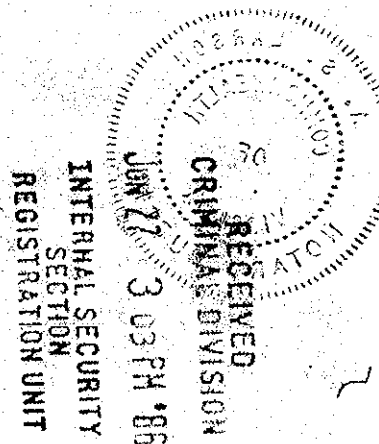
- ☐ To correct a deficiency in
- ☐ To give a 10-day notice of a change in information as required by Section 2(b) of the Act.
- ☐ Initial Statement
- ☐ Supplemental Statement for \_\_\_\_\_
- ☐ Other purpose (specify) \_\_\_\_\_
- ☒ To give notice of change in an exhibit previously filed.

4. If this amendment requires the filing of a document or documents, please list-

Agreement renewal

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. If more space is needed, full size insert sheets may be used.

Attached is an updated agreement to be attached to exhibit B, taking the place of the expired agreement.



Case 1:17-cr-00201-ABJ Document 525-2 Filed 02/23/19 Page 433 of 577  
The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this amendment and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief.

Paul J. Manafort, Jr.

Paul J. Manafort, Jr.

*(Both copies of this amendment shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)*

Subscribed and sworn to before me at Alexandria, Virginia

this 26th day of June, 19 86

W. S. Larson  
(Notary or other officer)

My commission expires March 15, 1990.

AGREEMENT

By this Agreement entered into on the 7th day of January, 1986, between Attorney Paul J. Manafort and his Associates, (hereinafter Consultants), and the United States Embassy of The Royal Kingdom of Saudi Arabia, (hereinafter the Embassy), the Parties agree as follows:

1. Scope of Employment. Consultant will provide professional services to the Embassy that will be of general nature. Such professional services shall include, but not be limited to, the monitoring and lobbying of legislation in the Congress and the Executive Branch of the United States Government, participation in the development and implementation of a strategy to aid in the procurement of foreign military sales, and advancement of the other unspecified goals of the Embassy.
2. Term. This Agreement will continue in force for a term of ~~one year~~. *SIX MONTHS* *C. M. J.*
3. Fees. In return for the performance of the service outlined herein, the Embassy agrees to compensate Consultant the base amount of \$100,000 with said amount being payable upon the execution of this Agreement. Additionally, Consultant shall receive additional compensation on a quarterly basis for projects undertaken on behalf of the Embassy. *C. M. J.*

In addition to such fees, the Embassy will reimburse Consultant on a monthly basis for all reasonable and necessary expenses including such expenses as travel, telephone, and postage and other incidental expenses in connection with the performance of the Embassy's work.

4. Miscellaneous Provisions.

- A. Notice. All notices provided for herein shall be sent by certified mail, postage prepaid, and addressed as follows:

To Consultants: Paul J. Manafort, Esquire  
324 North Fairfax Street  
Alexandria, Virginia 22314

To Embassy of Royal Kingdom of Saudi Arabia:  
HRH Prince Bandar bin Sultan  
Embassy of Saudi Arabia  
601 New Hampshire Avenue, NW  
Washington, DC 20036

RECEIVED  
CRIMINAL DIVISION  
JUN 27 3 03 PM '86  
INTERNAL SECURITY  
SECTION  
REGISTRATION UNIT

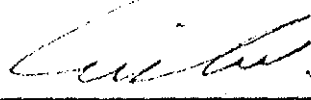
B. Termination. Notwithstanding the above, this Agreement may be terminated with 30 days written notice.

IN WITNESS WHEREOF, the Parties hereto, by their respective and duly authorized officers, have hereunto set their names.

PAUL J. MANAFORT, ESQ.

BY 

EMBASSY OF THE ROYAL KINGDOM OF  
SAUDI ARABIA

BY 

# **EXHIBIT 1028**

**REDACTED**

# **EXHIBIT 1237**

From: Rick Gates [REDACTED]  
Sent: Wednesday, November 14, 2012, 10:28 AM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Contract  
Attachments: [REDACTED] contract FINAL 11-2012.docx; NoName.att

---

[REDACTED]

Please find attached the final version of the contract with your requested changes. Please let me know if there are any other issues.

Regards,  
Rick





DATED 01 JULY 2012

---

[REDACTED]  
and  
[REDACTED]

---

CONSULTANCY AGREEMENT

---

**THIS AGREEMENT** is made the 1<sup>st</sup> day of July 2012

**BETWEEN:**

- (1) [REDACTED]  
[REDACTED] ("the COMPANY"); and
- (2) [REDACTED]  
[REDACTED] ("the CONSULTANT").

**RECITALS**

- (1) The COMPANY wishes, in view of the CONSULTANT's relevant skills, knowledge and experience to engage the CONSULTANT to provide certain consultancy services to the COMPANY
- (2) The CONSULTANT is willing to provide such services to COMPANY on and subject to the terms and conditions of this Contract.

**1. DEFINITIONS AND INTERPRETATION**

- 1.1 The following terms shall have the following meanings for the purpose of this Agreement:

"Affiliate"	of a specified person means any other person that directly or indirectly through one or more intermediaries controls or is controlled by, or is under direct or indirect common control with, the specified person (and 'control' means the ability or (as the case may be) the possession (directly or indirectly) of the power to direct or cause the direction of the affairs, management or policies of such person, directly or indirectly, whether by contract or ownership of voting securities or otherwise and 'controlled' shall be construed accordingly);
-------------	---

"Board"	means the Board of Directors of the COMPANY;
"clause"	means clauses in this Agreement unless the context has a contrary meaning;
"Commencement Date"	means 1 <sup>st</sup> July 2012;
"COMPANY"	where the context so admits includes the COMPANY's Affiliates;
"Term"	means from the 1 <sup>st</sup> July 2012 for a period of 6 months unless and until this agreement shall be terminated by either party in accordance with Clause 7, or by either party giving the other notice of termination of no less than three calendar months.

- 1.2 Headings contained in this Agreement are for reference purposes only and should not be incorporated into this Agreement and shall not be deemed to be any indication of the meaning of the clauses to which they relate.
- 1.3 References to parties, clauses, schedules, sub-clauses and exhibits are to the parties to, clauses of, sub-clauses of, schedules to and Exhibits to this Agreement, respectively.
- 1.4 Except where the context requires otherwise words importing the singular include the plural and words importing any gender include every gender, and (in each case) vice versa.
- 1.5 In this Agreement:
- 1.5.1 references to a 'person' shall be construed so as to include any individual, firm, company, government, state or agency of a state or any joint venture, partnership or other body corporate, unincorporated association and partnership (whether or not having a separate legal personality);

- 1.5.2 references to any English legal term for any action, remedy, method of judicial proceeding, legal document, legal status, court, official, or any legal concept or thing shall in respect of any jurisdiction other than England be deemed to include what most nearly approximates in that jurisdiction to the English legal term;
- 1.5.3 general words shall not be given a restrictive meaning by reason only of the fact that they are followed by particular examples intended to be embraced by the general words or introduced by the word 'other' and preceded by words indicating a particular class of acts, matters or things and accordingly the rule known as the ejusdem generis rule shall not apply to this Agreement; and
- 1.5.4 references to a statute or statutory provision shall include a reference to the statute or statutory provision as modified or re-enacted or both from time to time, and any subordinate legislation made thereafter.
- 1.6 References in this Agreement to anything which any party is required to do or not to do shall include his acts, defaults and omissions, whether direct or indirect, on his own account or for or through any other person and those which he permits or suffers to be done or not done by any other person.

## **2. APPOINTMENT**

- 2.1 The COMPANY engages the CONSULTANT as CONSULTANT of the COMPANY's business for the Term.

## **3. OBJECT OF THE AGREEMENT**

- 3.1 During the Term the CONSULTANT shall devote such of his time attention and abilities to the COMPANY business as is necessary for the proper exercise of his duties as CONSULTANT but nothing contained in this Agreement shall (subject to Clause 6) preclude the CONSULTANT from acting in a similar or any other capacity for any other person firm or COMPANY.

3.2 The CONSULTANT shall advise and assist the COMPANY as required in all branches of its business including in particular but without prejudice to the generality of the above provide general strategic and consulting advice to the COMPANY on a range of areas. The CONSULTANT in particular shall provide political and economic analysis and provide advice on specific economic policies for countries outside the European Union, and will provide the writing of occasional reports and memos to the COMPANY and will ensure the availability of the CONSULTANT to make a series of trips for work in Eastern Europe and Asia in countries that are outside the European Union.

3.3 Should the COMPANY at any time in future require services to be rendered by the CONSULTANT in European Union countries, then a new agreement shall be decided upon and such services shall be regulated under a different agreement.

#### **4. THE COMPANY'S OBLIGATIONS**

4.1 In consideration of the services to be rendered by the CONSULTANT under this Agreement the COMPANY shall pay to the CONSULTANT:

4.1.1 A fee of EUR € 930,000.00 (nine hundred thirty thousand euros).

#### **5. SECRECY**

5.1 The CONSULTANT shall not at any time during or after the Term divulge or allow to be divulged to any person any confidential information relating to the business or affairs of the COMPANY other than to persons who have signed a secrecy undertaking in the form approved by the COMPANY.

5.2 The CONSULTANT shall not permit any person to assist in the provision of the services under this Agreement unless that person has signed such an undertaking.

#### **6. TERMINATION**

The following obligations are conditions of this Agreement and any breach of them shall be deemed a fundamental breach which shall determine this Agreement immediately and the rights and liabilities of the parties shall thereafter be determined.

- 6.1 Failure on the part of the COMPANY to make punctual payment of all sums due to the CONSULTANT under the terms of this Agreement
- 6.2 Failure on the part of the CONSULTANT to observe any material obligation under this Agreement.
- 6.3 The levying of any distress or execution against the COMPANY or the COMPANY's liquidation (other than a members' voluntary liquidation).

**7. DELIVERY UP OF DOCUMENTS ON TERMINATION**

The CONSULTANT or his personal representatives shall upon the termination of his engagement immediately deliver up to the COMPANY all correspondence documents specification papers and property belonging to the COMPANY which are in his possession or under his control.

**8. AMALGAMATION OR RECONSTRUCTION OF THE COMPANY**

If before the end of the Term the engagement of the CONSULTANT is terminated by reason of the winding-up of the COMPANY for the purpose of amalgamation or reconstruction or as part of any arrangement for amalgamation not involving winding-up and the CONSULTANT shall be offered an engagement with the amalgamated or reconstructed COMPANY for a period of not less than the unexpired part of the Term and on terms not less favourable than the terms of this Agreement the CONSULTANT shall have no claim against the COMPANY in respect of such termination.

requirement by a governmental authority for taxes and contributions in respect of payments made to the CONSULTANT.

**9. SUPERSEDES PRIOR AGREEMENTS**

This Agreement supersedes any prior agreement between the parties whether written or oral and any such prior agreements are cancelled as at the Commencement Date but without prejudice to any rights which have already accrued to either of the parties.

**10. MISCELLANEOUS**

**10.1 Notices**

All notices to be given under this Agreement shall be in writing and shall either be delivered personally or sent by first-class or airmail prepaid post or by telex, cable or

facsimile transmission and shall be deemed duly served:

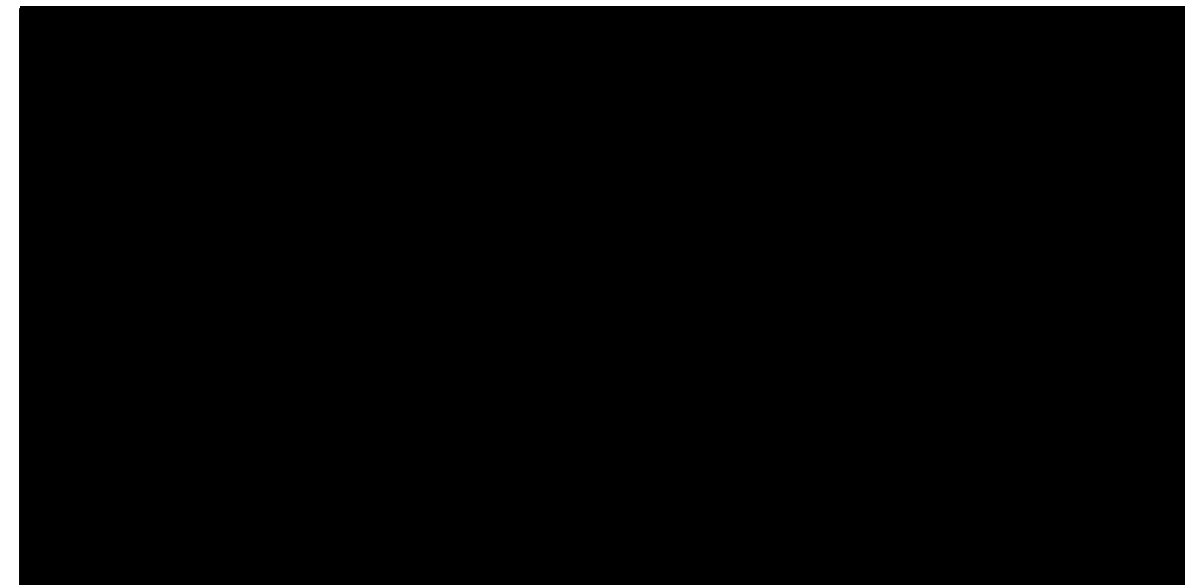
10.1.1 in the case of a notice delivered personally, at the time of delivery;

10.1.2 in the case of a notice sent inland by first-class prepaid post, 2 clear business days after the date of dispatch;

10.1.3 in the case of a notice sent overseas by airmail, 7 business days (being business days in the place to which the notice is dispatched) after the date of dispatch; and

10.1.4 in the case of a telex, cable or facsimile transmission, if sent during normal business hours then at the time of transmission and if sent outside normal business hours then on the next following business day provided (in each case) that a confirmatory copy is sent by first-class prepaid post or by hand by the end of the next business day.

Each notice shall be addressed to the address of the party concerned set out in this Agreement or to such other address as that party shall have previously notified to the sender;



**10.2 The COMPANY's right to assign**

This Agreement and all rights under it may be assigned or transferred by the COMPANY.

**10.3 Proper law and jurisdiction**

10.3.1 This Agreement shall be governed by BVI law in every particular including formation and interpretation and shall be deemed to have been made in the BVI

10.3.2 Any proceedings arising out of or in connection with this Agreement may be brought in any Court of competent jurisdiction in the BVI.

10.3.3 The submission by the parties to such jurisdiction shall not limit the right of the CONSULTANT to commence any proceedings arising out of this Agreement in any other jurisdiction he may consider appropriate.

10.3.4 Any notice of proceedings or other notices in connection with or which would give effect to any such proceedings may without prejudice to any other method of service be served on any party in accordance with Clause 12.1.

**10.4 Rights cumulative**

All rights granted to either of the parties shall be cumulative and no exercise by either of the parties of any right under this Agreement shall restrict or prejudice the exercise of any other right granted by this Agreement or otherwise available to it.

**10.5 Survival of terms**

No term shall survive expiry or termination of this Agreement unless expressly provided.

**10.6 Waiver**

The failure by either party to enforce at any time or for any period any one or more of the terms or conditions of this Agreement shall not be a waiver of them or of the right at any time subsequently to enforce all terms and conditions of this Agreement.

**10.7 Costs**

Each of the parties shall pay any costs and expenses incurred by it in connection with this Agreement.

**10.8 Third party rights**

A person who is not a party to this Agreement has no rights [under the Contracts (Rights of Third Parties) Act 1999] to enforce any terms of this Agreement.

**11. ARBITRATION**

All disputes or differences which at any time arise between the parties whether during the Term or afterwards touching or concerning this Agreement or its



construction or effect or the rights duties or liabilities of the parties under or by virtue of it or otherwise or any other matter in any way connected with or arising out of the subject matter of this Agreement shall be referred to a single arbitrator to be agreed upon by the parties or in default of agreement to be nominated by the [President for the time being of the Chartered Institution of Arbitrators] in accordance with the Arbitration Act 1996 or any statutory modification or re-enactment of it for the time being in force.

**AS WITNESS** the hands of the parties the day and year first above written

**SIGNED by**

for and on behalf of

\_\_\_\_\_

**SIGNED by**

for and on behalf of

\_\_\_\_\_

# **EXHIBIT 1307**

## MEMORANDUM

To: [REDACTED]  
From: PJM  
Subject: SA Report – Media Plan  
Date: August 1, 2012

---

The public release of the report prepared by the Skadden Arps (SA) law firm will provide a major opportunity for the Government to re-set the agenda and demand a fresh appraisal of its position regarding the trial and conviction of Yulia Tymoshenko. This document will address the global rollout strategy for the SA legal report, and provide a detailed plan of actions.

This event will provide an opportunity for Ukraine to challenge the international (European/US) perception that it is mounting selective political prosecutions that do not comply with international standards. It is clear that much of the truth concerning the crimes committed by YT has been overlooked, and misunderstood. The SA report conveys a direct and coherent account of the facts that will show the international community that the judicial system in Ukraine worked in this case but that some elements can be improved.

However, this moment presents equally significant challenges, in addressing the report's likely criticism of some procedural missteps and countering the onslaught of an extremely effective campaign being waged by the Government's opponents. It is inconceivable that the report will bring an end to heated debate; on the contrary, it is most likely to provoke an intense effort by all interested parties to claim that the report vindicates their position and a further phase of scrutiny by the international media and diplomatic community.

The media plan for the SA report release is built with the following observations in mind:

1. It is clear that most media reporting and misreporting, and misperceptions amongst the diplomatic and political communities, emanate from international wire service reports with Kiev-based correspondents.
2. Inaccurate or incomplete reporting by the newswires is repeated without challenge or fact-checking by international media outlets. In fact, the international media will have difficulty accepting the conclusions of the Skadden report because their reporting, to date, has been significantly slanted towards the Tymoshenko positions. To now embrace the Skadden report would be to repudiate their previous reporting. This is highly unlikely to happen.
3. There is no plan in place that ensures such inaccuracies are corrected.
4. Media relations techniques in Ukraine follow the convention of news conferences rather than individual briefings. Showpiece news conferences take place after each legal event, and are often hijacked by some elected politicians interjecting into statements by prosecutors.
5. The information about the case online has not been sufficiently available in English, and the media has to work too hard to find a position counter to the clearly communicated plan of YT.
6. Certain elements of the media and YT's team will attempt to take the negative aspects of the trial procedures in which Western due process was not followed, and attempt to weave a headline from



those negative points, while attempting to ignore the main tenet that she was tried and convicted fairly under Western standards.

### **Media Strategy and Plan**

Based on current information, SA is expected to deliver its report the week of August 9<sup>th</sup> to the MoJ. The communications strategy, outlined below, is subject to modification depending on the content of the final SA report. However, we are proceeding with the following points in mind:

- The report was commissioned by the Ministry of Justice (MoJ) not the Office of Prosecutor General's Office (OPG).
- The report will conclude that the trial was valid and that crimes were committed by YT, but that some irregularities existed in the process that are not in line with Western jurisprudence.
- It will present a more detailed analysis of the facts and evidence in the process than has previously been seen by the international community.
- The report will be in English and that version will represent the official record.
- The report will contain some criticism of the OPG and the Judge, based on the process and procedures of the trial, and these criticisms, will be exploited by our opponents.
- SA cannot proactively lead in communications, given their restrictions by FARA registration and disclosure.

In order to neutralize the inevitable attacks that will commence as soon as the report is released, and optimize our control of the story, we need to be pro-active in reaching out to carefully chosen key stakeholders. The approach would be as follows:

### ***Report Release***

1. The final report (in English) will be delivered by SA to the MoJ the week of August 9<sup>th</sup>, and will carry the firm's authoritative imprimatur; but the responsibility for publication and distribution rests with the MoJ.
2. The full text of circa 180 pages, which includes an executive summary, will be published in Ukrainian (subject to translation by the MOJ) and English languages. The report will be further translated in Russian (at the direction of the MOJ). Only the English translation will be the responsibility of SA. SA will work with the MOJ to ensure the integrity of the translated versions of the report.
3. The report will be released by the MoJ with a press statement by email distribution. The statement will be drafted by [REDACTED] and approved by the MoJ. The statement will accompany the report and distributed to key stakeholders, and placed on the Ministry's website. In addition, the statement will be translated into multiple languages.
4. Talking points and Q&A material will also be drafted by [REDACTED] for all key groups that will need messaging. It is imperative that complete discipline is assured in this process. There can be no mistakes with the release process, messaging, and the messengers so that the utmost credibility will be viewed with the process.
5. In order to generate good will toward certain key stakeholders, a small number of individuals will be notified just prior to the release of the report by MoJ. This will include key members of the EU [REDACTED]), the EC, the USG, and foreign diplomats in Kyiv.
6. In addition, a small number of international journalists should be briefed in advance of the publication of the report, under strict embargo, and formally contacted by the MoJ press team (with support from the AC team on behalf of the MoJ).

7. [REDACTED] will manage simultaneous distribution of the Report on the release date and send to key political stakeholders in Brussels, Berlin, London, Paris, Rome, and others. A list of the key stakeholders is attached (Attachment 1). This will include outreach to [REDACTED], plus think tanks and interested NGOs. The Ukrainian embassy in Brussels will be asked to distribute information more widely to MEPs on the release date and the ECFMU will do similar disseminations. [REDACTED] will focus on the specialist legal writers, analysts and commentators.

#### **Post Report Release**

8. [REDACTED] will need to do briefings and interviews (group and one-on-ones) with key stakeholders in the Attachment, and as specified below. [REDACTED] will not initiate these briefings but it will be done through [REDACTED] and the AC team in the key targeted cities.
9. A private briefing with [REDACTED] should be offered to [REDACTED] immediately following the release of the report. Depending on scheduling, this meeting should happen as soon as possible.
10. A private briefing should also be offered to the Ukrainian Commissioner for Human Rights, a fluent English and German speaker.
11. Special attention should be given to the German and Russian media in this distribution, as well as those journalists previously briefed by the First Deputy PG on his media tours in major European cities. Consideration should be given to [REDACTED] visiting Moscow for one round table briefing with a group of leading correspondents covering Ukrainian matters from there. Similarly, he should do a roundtable in Berlin for interviews with a selection of the most influential commentators.
12. The Prosecutor General will release a press statement immediately following publication of the SA report, welcoming the report and the analysis given its role and involvement as prosecutors in the trial process. [REDACTED] will draft the press statement and seek approval from the OPG.
13. Both the MoJ and PG's offices will receive many media enquiries and requests for comment. Responses by both teams of press officers must be carefully logged, tightly controlled and closely supervised. [REDACTED] will draft the messaging points for the MoJ and the OPG, and prep the press staffs of both departments for handling the media enquiries.
14. Skadden will also receive a large number of media calls about the report and will be obliged to respond on the record. With the agreement of Skadden, the [REDACTED] team will manage the inbound flow of those calls.
15. *No Government entity should stage a news conference for the international media* because it reduces our control and also because it is unlikely that international media outlets will send enough journalists to attend such a conference in Ukraine. Instead, we could field the PG / First Deputy PG and potentially other media trained senior Government Ministers for a small number of one-to-one interviews following the publication of the report.
16. A domestic news conference is a possibility but the Kyiv-based foreign correspondents could not be excluded and control would still be a challenge. It would be preferred to do a small number of limited domestic interviews, carefully planned and managed.
17. The President's Administration should instruct the Ministry of Foreign Affairs to distribute a briefing pack to all foreign ambassadors based in Kyiv and all Ukrainian ambassadors in EU Member States, plus US and Russia. The pack should include the full Report, the talking points and the statements of both the MoJ and PG, with a covering note from the Minister of Justice and clear instruction to distribute the Report and statements to their respective stakeholder constituencies. It is essential that there should be no slippage in the timetable, ( i.e. this onward distribution must occur once the MoJ releases the its statement and report).

***Reactions and Responses***

18. The likely follow-on story will be that the opposition will try to use the report to mount a campaign calling for a re-trial. There will be substantial international pressure placed on the Government to act on the report. We have to be firm in the position that this report concludes that a crime was committed and that the weight of evidence would have secured a conviction under a Western-style system, irrespective of any minor procedural issues.
19. All ambassadors and departments of Government must use the same message and stand firm that any politician in any country who behaved in this way would have been punished.
20. [REDACTED] will draft message points for the Government on these subjects and take into account likely criticism levied by YT's legal team, the Opposition, and other members of the international community.

***Command Center***

A Command Center must be established to ensure the absolute strictest discipline throughout this process. The Command Center will disseminate talking points and act as the point-of-contact for any information that is distributed by the Government. This includes the package of material that will go to foreign embassies via the MFA, cover letters, interview requests, and all written and verbal responses.

The Center needs to have a dedicated set of resources including:

- separate translators for multiple languages (Russian, Ukrainian, English, German and French)
- writers to assist [REDACTED] and others in drafting the messaging
- dedicated office with no access for outside parties – it must be a secure center
- a lead person for the office needs to be selected to coordinate the activity of the Command Center and to address the actions by the MoJ, OPG and SA.

We are about a week to ten days away from the release of the final report. The plan and related actions need to be implemented as soon as possible so that we are fully prepared to deal with the release of the SA report. As soon as it is released, it will go viral and we need to make sure we are fully prepared to deal with the impact from the international community. Once the report is released, a public perception war will ensue, and her legal team and supporters, will do everything possible to undermine the credibility of the SA report.

I need your approval of this plan to begin moving forward.

# **EXHIBIT 1308**

**Subject:** Re: an urgent request ON IT

**From:** [REDACTED]

**Date:** 9/19/12, 9:29 AM

**To:** Rick Gates [REDACTED]

**CC:** Paul Manafort [REDACTED]

And [REDACTED] ALSO happy to speak to Senator [REDACTED] and ask hm to delay or tone down or stop the resolution

Sent from my iPad

On Sep 19, 2012, at 15:25, Rick Gates [REDACTED] wrote:

On it. Thank you.

---

**From:** [REDACTED]

**To:** Paul Manafort [REDACTED]

**Cc:** Rick Gates [REDACTED]

**Subject:** Re: an urgent request ON IT

Am with [REDACTED] now, who is speaking to [REDACTED] who is getting ready for the wedding of his only daughter...BUT....he will talk to [REDACTED] yes. He is delighted to speak to [REDACTED] and try to calm things down and ask them to wait and tust him..Need rick to call me in three minutes so we can set this up, make it happen....

[REDACTED] says yes here is his personal and private mobile and [REDACTED] shd call him

[REDACTED]

The Senator can dial him directly or [REDACTED] can put him on

He will keep he phone open until midnight CET or six pm DC time

He is very keen to delay and calm things down

READY....

Sent from my iPad

On Sep 19, 2012, at 15:12, Paul Manafort [REDACTED] wrote:

Keep me posted on [REDACTED] call to [REDACTED] status

---

**From:** Rick Gates [REDACTED]

**Date:** Wed, 19 Sep 2012 08:07:57 -0500



[REDACTED] 00012



To: Paul Manafort [REDACTED]  
Subject: Re: an urgent request ON IT

He was supposed to talk with [REDACTED] yesterday but I have not heard back. Trying to reach him. I will brief him on the other items and see if he can call [REDACTED] as well.

---

From: Paul Manafort [REDACTED]  
To: Rick Gates [REDACTED]  
Subject: Re: an urgent request ON IT

Is [REDACTED] calling [REDACTED]

---

From: Rick Gates [REDACTED]  
Date: Wed, 19 Sep 2012 07:51:49 -0500  
To: Paul Manafort [REDACTED]  
Subject: FW: an urgent request ON IT

[REDACTED]  
Message was delivered to [REDACTED] CoS and he is now aware. Do we have a sense of what time [REDACTED] will call [REDACTED] office? I am working on [REDACTED] office now. Please let me know.

Rick

---

From: Paul Manafort [REDACTED]  
To: Rick Gates [REDACTED]  
Cc: "K. Kilimnik" [REDACTED]  
Subject: Re: an urgent request ON IT

Rick

I would recommend that [REDACTED] be made aware of these facts and [REDACTED] role as a designated representative of the President of the EP. We ought to try to make the connection from both ends. Have [REDACTED] aware of [REDACTED] and the importance of [REDACTED] talking to [REDACTED] who has been tasked with the intermediary role. [REDACTED] should also be made aware of the fact that the US would be getting out front in a political way even further than the EP has gotten by passing this resolution.

Finally the points of my last email to you are relevant re [REDACTED] understanding the acceptability of holding the hearing but not passing any resolution at this time. [REDACTED] should make this point to [REDACTED] as well.

P

---

From: Rick Gates [REDACTED]  
Date: Wed, 19 Sep 2012 05:39:08 -0500  
To: [REDACTED]  
Cc: Paul Manafort [REDACTED]  
Subject: Re: an urgent request ON IT

[REDACTED]



The number for [REDACTED] is [REDACTED]. You can also ask for his [REDACTED]. If your guy is going to call [REDACTED] I suggest you have him call [REDACTED] too. This just as important since [REDACTED] is driving the legislation. [REDACTED] number is [REDACTED]. Keep me posted.

---

From: [REDACTED]  
To: [REDACTED]  
Cc: Paul Manafort [REDACTED] Rick Gates [REDACTED]  
[REDACTED]

<[eckart.sager@gmail.com](mailto:eckart.sager@gmail.com)>

Subject: Re: an urgent request ON IT

Ok i am on it.

Will see Chancellor and place the call to [REDACTED] in 90 minutes  
Rick is getting me a direct line to [REDACTED] office.

[REDACTED]

Sent from my iPad

---

From: [REDACTED]  
Date: September 19, 2012 11:44:31 GMT+02:00  
To: [REDACTED]  
Cc: Konstantin Kilimnik [REDACTED]  
Subject: an urgent request

Dear [REDACTED]

We have an idea with regard to the draft res under consideration by Senate's foreign relations committee. Would it be possible to reach out to [REDACTED] and ask him to make an early morning call to [REDACTED] with the following messages (more details in the attached files):

- After having exerted substantial pressure on Ukraine, the European Union is now pursuing the policy of engagement with Ukraine on the Tymoshenko case. In particular, the recent [REDACTED] mission to Ukraine proved to be helpful and efficient leading to quite a number of very substantial and unprecedented achievements. The policy of engagement with Ukraine is far more efficient than the policy of the alienation of Ukraine.

- Yulia Tymoshenko exhausted national remedies and her application is now under consideration by the European Court for Human Rights (ECHR). Therefore, proper assessment of the Tymoshenko case can only be done after ECHR delivers its highly authoritative judgment.

- the discussion about situation in Ukraine can take place today but it is obvious that resolution calling for the release of Ms Tymoshenko can be helpful if adopted after the October elections,

not prior to them.

Paul works through his channels and is sending the same messages. He also supports the above initiative. The issue is under Big Guy's personal control.

As you understand, the matter is very urgent and we understand the time pressure but it would be fantastic if such a call could take place.

Best regards,



<senate.doc>

<res part 1.pdf>

<res part 2.pdf>

# **EXHIBIT 1349**

Ladies and Gentlemen of the Press,

I am addressing you today in my capacities as President of the European Center for a Modern Ukraine, as [REDACTED] and as [REDACTED].

My fellow Members of Parliament and I are deeply concerned over the one-sided news coverage about Ukraine, through which the impression is increasingly developing that Ukraine has turned away from the EU. However, the opposite is the case: the Ukrainian Parliament and the [REDACTED] Government have clearly dedicated themselves to Europe, to its values, to democracy and the rule of law.

Concrete measures implemented by the incumbent government over the past few years make this clear:

1. Reforms and Modernisation

Ukraine still has to grapple with the consequences of the Soviet era. These appear, for example, throughout the judicial system or through corruption, which is unfortunately still prevalent in Ukraine. Whereas the previous government was far too inactive, the current Parliament and the reigning government have made important steps here:

- Last month in April 2012, the Ukrainian Parliament passed several different laws to reform the code of criminal procedure. These laws will make criminal proceedings more transparent and decisively strengthen the rights of the accused and their defense. The draft laws were prepared in close coordination with the European institutions and were expressly approved by the Venice Commission of the Council of Europe.
- We are combating corruption. Bribery and exerting political influence have been incorporated into the penal laws, a move which was well received by the Group of States Against Corruption (GRECO) of the Council of Europe. As a result, proceedings have been opened against 800 politicians and functionaries, 300 from my own party, the Party of Regions, among them. No one is above the law- not even former Minister Presidents.

2. The Case of Tymoschenko

- The European Committee for the Prevention of Torture is expressly invited to inspect the conditions of the detention of Ms. Yulia Tymoschenko and other oppositional politicians on location again. The accusations from Ms. Tymoschenko with respect to the alleged use of force during her transfer to the Central Clinical Hospital No. 5 "Ukrsalisnyzja" in Kharkiv are already being independently investigated by the Prosecutor General of Ukraine.
- We honor every decision of the European Court of Justice for human rights. However, we are convinced that the investigations of the European institutions will confirm the legality of the criminal proceeding and the conditions of detention.

3. Free Elections

- Free and fair elections are an essential element of every democracy. We are therefore doing everything in order to ensure transparency and justice in the run-up to and during the parliamentary elections of 2012. The opposition has access to the media and can

[PAGE \\* MERGEFORMAT]

freely carry out their own electoral campaigns. The international observers of the OSCE are cordially invited to stringently monitor the elections. Potential irregularities will be immediately confronted.

4. EURO 2012

- The Ukrainian government, the Ukrainian Parliament and the Ukrainian people have done everything in recent months and years so that EURO 2012 will be a complete success for us and our European friends. Please allow us in this way to demonstrate that Ukraine is a part of Europe.

Ukraine has come a great deal closer to the EU under the [REDACTED] government, as the initialing of the Association Agreements demonstrates. Nevertheless, we will still require the support of Europe. We have to further modernize our society and implement sensitive reforms without Ukrainian society coming apart in the process. For this to occur, we need economic success. In this respect, we hope that the EU will keep its words and support us on our way forward, particularly in light of the negotiations with Russia over fair gas prices and the modernization of our gas transport system.

The current Ukrainian government and the Ukrainian Parliament demonstrate through their doings how very much we are dedicated to Europe and its values; we hope that Europe allows its deeds to speak to us as well.

I would be very pleased if, as a journalist, you could bear these aspects in mind more strongly in the future.

I remain at your disposal at any time for further information.

Sincerely from Kiev,

[REDACTED]

[PAGE \\* MERGEFORMAT]

# **EXHIBIT 1351**



## Message

From: [REDACTED]  
Sent: 5/18/2012 7:20:35 PM  
To: [REDACTED]  
Subject: Ukraine – what we've been up to  
Attachments: Building confidence in the prosecution of Y.pdf

[REDACTED]

Attached is a short presentation that we prepared yesterday for the Prosecutor General. It gives a flavour of the work we're doing. As you will understand, it takes longer to get anything done here because of the language barrier – we're using translators for every meeting – the cultural gulf, Government staff mentality and absence of know-how. We have established trust with the Prosecutor General and his team. He told us yesterday that he was delighted with our work and had told the President. He said we could have whatever we need to do the job, so we now have Government drivers running us around, security clearance and are being treated like colleagues. They feed us well, too!

We've been provided with a huge amount of briefing, both in document form and in a series of meetings with prosecutors, experts and others, and have been working round the clock to digest and convert this into press backgrounders, web content, Q&As etc. We've set up an operations room, with computers, phone lines and other office equipment. We've been media training the team of prosecutors. And we've been meeting every evening with the lawyers, to tap into their knowledge, although they have been a little coy about sharing too openly with us, to maintain the integrity of the review that they have been commissioned to undertake. They have been interviewing a vast number of witnesses and tipping us off about the nuggets they've found and the key people for us to meet. [REDACTED] is now convinced of Yulia's guilt and that the case against her is extremely strong. We agree.

We got a good deal on our hotel, because it's new and have blocked out rooms for the next couple of months. Frankly, I am sure that we'll be here at least till the end of the year.

The base fee that we have agreed with Rick Gates at Davis Manafort is £90,000 per month. As soon as I get the first wire transfer, I am going to tell him that the client gave his approval yesterday for us to proceed urgently with a Research project, a website and digital/social media strategy. Each of these will require additional budget and this should take our monthly revenue up to around £150,000. I'll update you on that as we make progress.

Thanks for all your understanding and support.

[REDACTED]

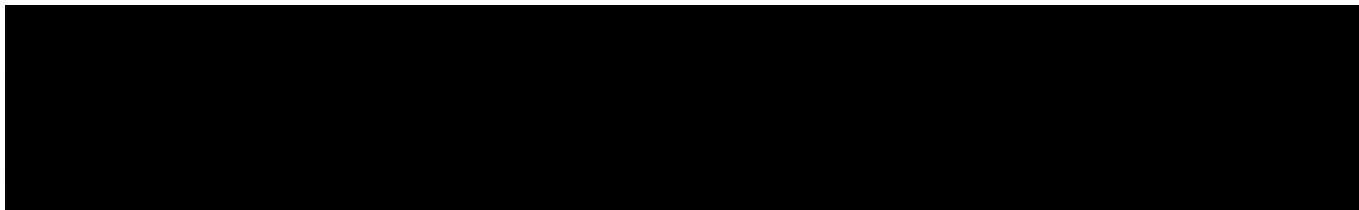
[REDACTED]

GOVERNMENT  
EXHIBIT  
U.S. v. MANAFORT, 1:17-cr-201 (A.B.J.)  
**1351**

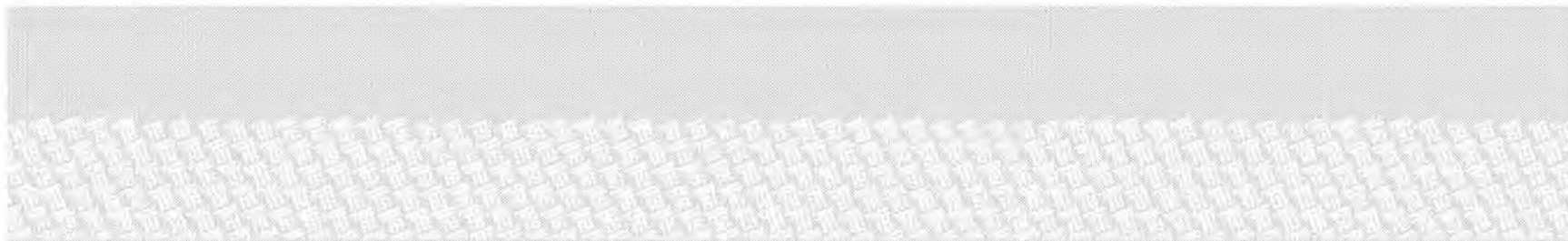
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[REDACTED] 000894



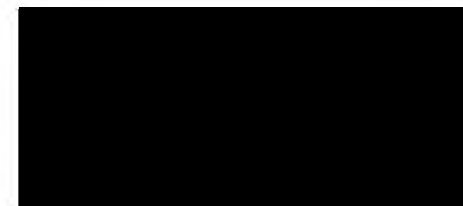


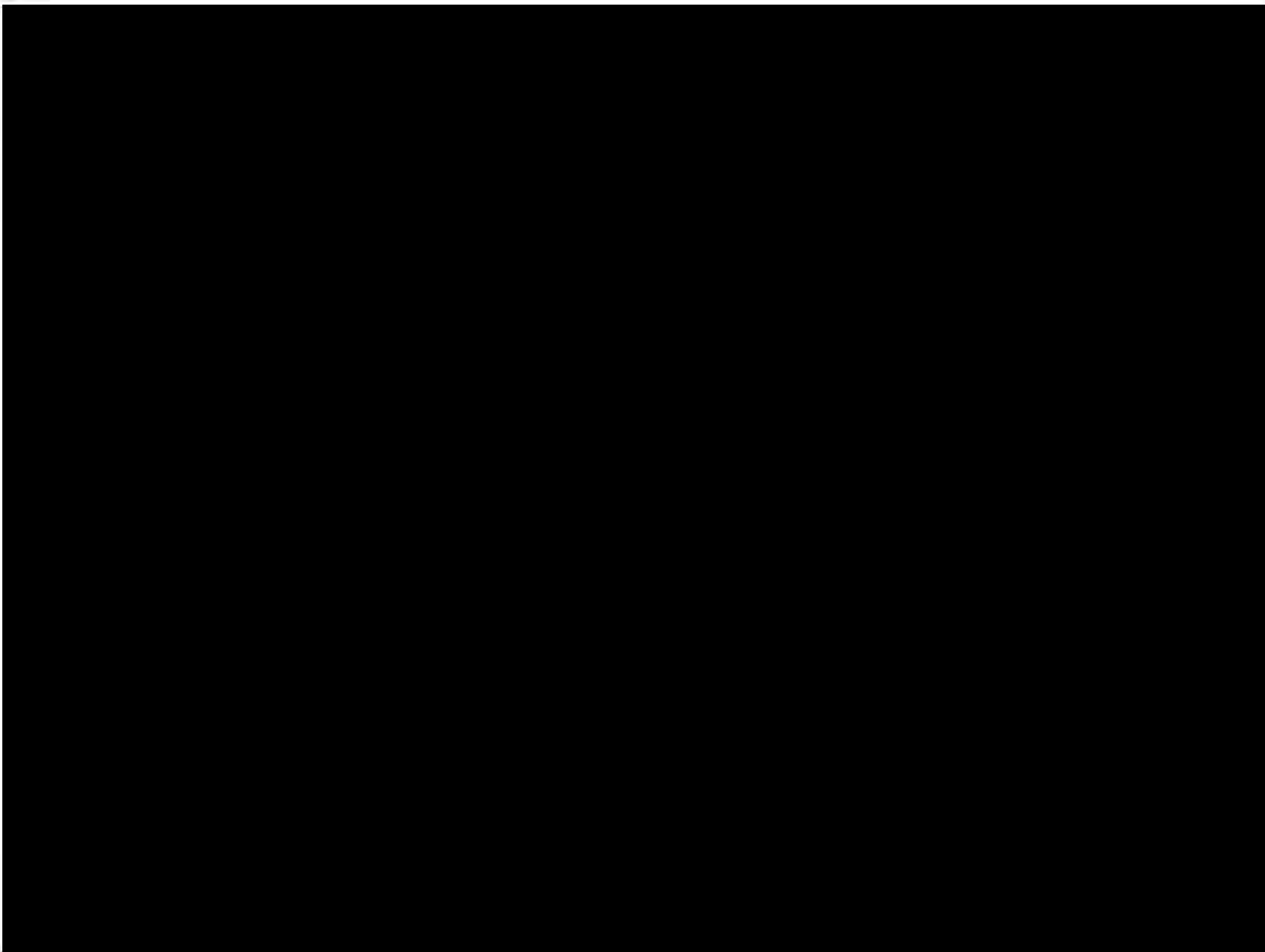
# BUILDING INTERNATIONAL CONFIDENCE IN THE PROSECUTION OF YULIA TYMOSHENKO



KYIV

MAY 2012





CONFIDENTIAL

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# Our Specialist Practices

## Corporate Finance/ Restructuring

- Restructuring/  
Turnaround  
Services
- Bankruptcy  
Support Services
- Transaction  
Advisory Services
- Private Equity
- Performance  
Improvement
- Interim  
Management
- Investment  
Banking

## Economic Consulting

- Antitrust &  
Competition  
Economics
- Business  
Valuation
- Intellectual  
Property
- International  
Arbitration
- Labor &  
Employment
- Public Policy
- Regulated  
Industries
- Securities  
Litigation & Risk  
Management

## Forensic and Litigation Consulting

- Forensic  
Accounting &  
Advisory Services
- Global Risk &  
Investigations  
Practice
- Dispute Advisory  
Services
- Intellectual  
Property
- Trial Services
- Financial &  
Enterprise Data  
Analytics
- Compliance,  
Monitoring &  
Receivership

## Strategic Communications

- Financial  
Communications
- Corporate  
Communications
- Public Affairs
- Creative  
Engagement
- Strategy  
Consulting &  
Research

## Technology

- Computer  
Forensics &  
Investigations
- Discovery  
Consulting
- E-discovery  
Software &  
Services

## The Challenge: Overcoming Ignorance

- Foreign observers see prosecution of Tymoshenko as “political persecution”.
- The charges are not understood: little is said about the evidence.
- Tymoshenko is seen as a female celebrity, the champion of European integration and victim of a corrupt, self-interested political-industrial group.
- Her background as rich oligarch and history of corruption completely overlooked.
- Ukraine is seen as a country struggling to escape its Soviet past, with foreign observers assuming the law is unfair, and subject to political influence.
- Tymoshenko is a skilled communicator, with a highly effective and professional team of campaigners who are fighting her cause through the media, NGOs and political communities.
- Statements by the Prosecutor General’s office are dismissed as evidence of political influence.
- With global focus on Ukraine for Euro 2012 and the start of a second trial, we must be proactive in communicating the facts quickly.

## Communication Objectives

- Explain the real story; show the evidence.
- Expose the real Tymoshenko.
- Challenge ignorance, prejudice and bias within international reporting.
- Seek to achieve accurate, fair and balanced coverage.
- Neutralise the impact of the Tymoshenko campaign tactics.
- Win acceptance for Ukraine's diligent and professional prosecution process.
- Minimize disruption of the Euro 2012 tournament.
- Defend Ukraine's international reputation.

## Recommended strategy

1. Create a compelling story and message
2. Establish a single, rapid source for authoritative information
3. Plan now to persuade tomorrow
4. Engage the international media dynamically
5. Reinforce the diplomatic effort
6. Build a web channel for international media
7. Mobilise a digital / social media strategy
8. Monitor changing sentiment and evaluate progress

## Create a compelling story and message

- Take control of the narrative about Tymoshenko.
- Re-frame her as a corrupt oligarch, rather than paraded as a beacon for democracy.
- Focus on the facts: evidence convinces.
- Simplify this complex case, help the media to follow it.
- Convey the facts without emotion.
- Prepare to answer any question put to us.



## Setting the key messages

- Messages will be developed by “brainstorming” together.
- Key themes include:
  1. No angel: behind the hair, lurks the real Tymoshenko.
  2. Anti-corruption clampdown in Ukraine: others accused.
  3. Crime is crime: no citizen is above the law.
  4. Fraud: the largest committed in Ukraine.
  5. European analogy: other countries are pursuing corrupt politicians.
  6. Evidence: reviewed by leading international experts.
  7. A just response: fair treatment both at trial and in prison.

## Establish a single, rapid source for authoritative information

- Open an international press office and 'phone line.
- Log and track all international media enquiries.
- Create a timeline of all activity to enable effective planning for media “spikes”.
- Launch a dedicated media information website.
- Mobilise a digital / social media strategy.

## Plan now to persuade tomorrow

- Enhance the effectiveness of key spokespersons with media training – [REDACTED] and an alternative.
- Enhance the effectiveness of the press service with training – to be more confident and influential.
- Advise on effective management of the media at trial.
- Develop a comprehensive map of the stakeholder landscape.
- Identify the safest media targets for proactive engagement.
- Develop a timeline for future challenges and risk posed by the Tymoshenko campaign, and plan our response.

## Engage the international media dynamically

- Pre-brief journalists and consider their response to our position.
- If appropriate, [REDACTED] or his alternative should be offered for interviews.
- Monitor the output and correct any errors.
- Follow up and maintain a dialogue with the journalist.
- Use effective online strategy to link constructive articles.
- Zero tolerance of inaccuracy or bias – rapid and firm rebuttal.

## Reinforce the diplomatic effort

- We are part of your team, not the President's office or Ministry of Foreign Affairs.
- Essential to show the prosecution as independent from political and diplomatic affairs.
- Coordinate with all key parties, target the right people and ensure that communications is working effectively.
- Support Ukraine's ambassadors in their communications.
- Target key foreign ambassadors in Kyiv, with clear and effective briefing documents.
- Support your dialogue with international delegations, to overcome ignorance and educate on the facts.

## Build a web channel for international media

- Create a media information portal
- Referred to and linked to from the current Prosecutor General of Ukraine's website ([www.gp.gov.ua](http://www.gp.gov.ua)).
- Key source for the international media.
  - Statements and responses
  - Background briefing papers
  - Photos and video to download
  - Register for email alerts
  - Social media links to YouTube, Facebook, Twitter etc
  - Calendar of key upcoming events
  - List of key contacts
  - Searchable
  - English language priority – consider others

- 13 -




[Back to main website](#)
[Рус](#) / [Українська](#) / [Eng](#)

## PROSECUTOR GENERAL OF UKRAINE

Press Office

Headline to main story lorem ipsum dolor sit

### Home

[Public announcements](#)

[Backgrounders](#)

[Media library](#)

[Social media centre](#)

[Calendar of events](#)

[Contacts](#)



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May 14, 2012

Lorem ipsum dolor sit amet, consectetur adipiscing elit. Duis ac lacus id nisi pellentesque consequat.

May 7, 2012

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May 7, 2012

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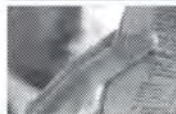
[MORE](#)

### Latest from the media centre

[MORE](#)



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### Search the media centre

Can't find what you need? Search here...

Enter a subject, topic or keyword



### Social media centre

Quicklinks to all our key social media...



### Media toolkit

Quicklinks to key media...

[Timeline](#)

[Images](#)

[B-roll](#)

[Alerts](#)

### Calendar

Key dates...


MON	TUE	WED	THU	FRI	SAT	SUN	
26	1	2	3	4	5	6	
7	8	9	10	11	12	13	
14	15	16	17	18	19	20	MAY
21	22	23	24	25	26	27	
28	29	30	31	1	2	3	

## Mobilise a digital / social media strategy

- Online, Tymoshenko in winning the argument – we must change this
- Smart strategy is essential – understanding convergence of traditional media, search engine optimisation (SEO) and social media.
- Create positive content, amplifying key messages for the most influential online sites venues .
- Suppress negative content via the search engines.



facebook



**Yulia Tymoshenko**  
5,531 likes · 579 talking about this

Like Message

Personal website  
Yulia Tymoshenko <http://tymoshenko.ua/>


About Photos Likes YouTube News

Highlights

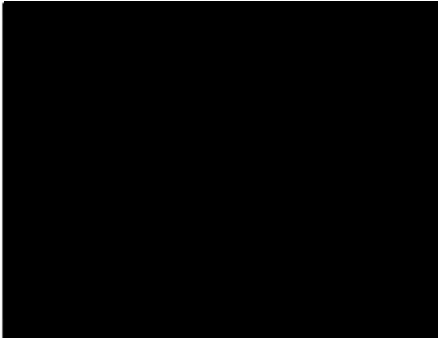
Post Photo / Video

Write something...

**Yulia Tymoshenko**  
2 hours ago via RSS Graffiti

 **Євгенія Тимошенко: влада незаконно поширює конфіденційну інформацію про маму**  
Дочка прем'єр-міністра України заявляє про намір

Recent Posts by Others on Yulia Tymoshenko [See all](#)



World 

## Tymoshenko Refuses Medical Treatment over 'Media Leaks'

Topic: **Yulia Tymoshenko case**



Ukrainian ex-Prime Minister Yulia Tymoshenko

AP Wirephoto

KIEV, May 15 (RIA Novosti)

Tags: Viktor Yanukovich, Yulia Tymoshenko, Kiev, Ukraine

Ukrainian ex-Prime Minister Yulia Tymoshenko, who is serving a seven-year jail term over her role in the signing of a 2009 gas deal with Russia, has refused to continue medical treatment for spinal disk herniation, Ukrainian Deputy Health Minister Olexandr Tolstanov said on Tuesday.

Last week, Tymoshenko, who has suffered from severe spinal pain, was moved to a hospital in the eastern Ukrainian city of

### Related News

- Ukraine's Top Court Shelves Tymoshenko Appeal
- Tymoshenko Stops Hunger Strike
- Tymoshenko Moved from Jail to Hospital
- Prosecutors Refuse to Open Tymoshenko Assault Case

### Multimedia

# Mobilise a digital / social media strategy

## 1. Digital Analysis

- First, analyze media, blogs, videos, message boards, social network communities, Twitter and more – to capture and understand opinions, comments and conversations.
- We will make detailed recommendations for digital / social media strategy.

## 2. Digital / Social Media Dashboard

- Set up a real-time dashboard that will mine the online media landscape for news articles, social media mentions and conversations / posts.
- Follow all activity in real time and take action immediately.

## 3. RSS News Aggregator

- Establish RSS Feed Reader button and synchronize with our website
- RSS is used by millions of web users worldwide to keep track of their favourite websites
- RSS shares relevant and up-to-date information with our followers subscribers promptly after the content is published

# Monitor sentiment and evaluate progress

Understand and track views of international “Opinion Leaders” & “Policy Makers”.

## 1. Opinion Leaders

- Influence the attitudes and behaviour change of their followers.
- Target communications at them – “trickle down” messages to influence target groups.
- This group is sophisticated and more actively engaged in media and debate than general population.

## 2. Policy Makers

- At the centre of the policy debate; occupy positions of public and private influence.
- Their views are also shaped distinctly by Opinion Leaders.
- While elected officials can be hard to reach for research purposes, their staffs, who represent and advise them, are generally reachable.

## Research: Benchmarking

### 1. **European Opinion Leaders**

Survey 1,000 respondents in business and political leadership across the EU

### 2. **Ukraine Opinion Leaders**

Survey 1,000 respondents within Ukraine to understand attitudes towards the prosecution.

### 3. **EU Brussels & National Policy Makers**

(EU institutions, MEPs, country MPs, their political staffers, assistants and stakeholders)

Survey 100 high level respondents to understand their opinions on the prosecution.



## Research: Benchmarking

### Questions:

1. Awareness of the present situation.
2. Knowledge of key facts.
3. Their perspective on key points and drivers.
4. Levels of motivation to actively or passively to be involved.
5. Information sources (push and pull).
6. Influence & credibility of information sources .
7. Impact upon reputations and actions.
8. Forecasting of likely scenarios.

## Research: Tracking & evaluating progress

Set up dedicated team and system for ongoing tracking research.

- Understand how sentiment is shifting – positively or negatively – to inform tactical action.
- Testing of messages and scenarios.

**1. Focus Group (qualitative)**

**2. Online surveys (quantitative)**

## Forensic Accounting and Investigations

[REDACTED] provides an integrated set of services relating to forensic accounting, fraud investigation, anti-corruption and asset tracing.

Our investigative experience is global and diverse. Our experts have been involved in many large fraud, corruption and asset tracing assignments in many jurisdictions. For example, this work includes:

- \*Asset tracing investigation for the [REDACTED] in relation to the alleged improper transfer of many billion pounds of state owned assets.
- \*Assisting the [REDACTED] [REDACTED] in the recovery of \$5bn which had been misappropriated by management through a series of loans, investments and other transactions.
- \*Investigating allegations of bribery and corruption on behalf of the [REDACTED] in relation to sanctions against Iraq and the [REDACTED] "Oil For Food" programme.
- \*Assisting the [REDACTED] with setting up an anti-corruption and fraud investigation division.
- \*Assisting the Trustee for the liquidation of [REDACTED] with a global asset tracing investigation, in relation to the largest ever reported Ponzi scheme in US financial history.
- \*Assisting the [REDACTED] police in a confidential corruption enquiry and a multi-jurisdictional asset tracing investigation. The allegations had been made against an open ended mutual fund that held investments in the Russian telecom industry. The amount involved was in excess of US\$1billion.



## Our Roadmap: This week

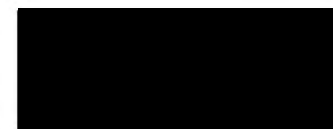
- Mapping of stakeholders, especially media
- Review legal documents and produce briefing packs:
  - Backgrounder
  - Message Book
  - Timeline
- Media train key spokespeople
- Identify media targets and arrange outreach
- Produce diplomatic briefing document
- Engage with third parties involved in diplomatic activity
- Develop diplomatic engagement plan
- Support [REDACTED] hearing

## Roadmap: Week 2

- [REDACTED] in Sweden for diplomatic meetings
- Media engagement in Sweden?
- UK media engagement
- Possible US media engagement
- Develop Trial Plan for 2<sup>nd</sup> case
- Complete trial team media training
- Training for Press Team
- Launch website and populate it with content

## Roadmap: Week 3

- Brussels media outreach
- French media outreach
- German media outreach
- Discuss issues plan for Euro 2012:  
security/broadcasting/stunts
- Initiate social media strategy
- Present research and stakeholder mitigation plan
- Plan for use of report by law firm



# **EXHIBIT 1357**

Message

**From:** [REDACTED]  
**Sent:** 6/22/2012 3:59:27 PM  
**To:** [REDACTED]  
**Subject:** FW: RAPS.com: U.S. attorneys in ECHR under Tymoshenko case to cost Ukraine \$12,5k

Yet another Minister swallows his foot.

---

**From:** [REDACTED]  
**Sent:** 22 June 2012 16:58  
**To:** 'Van Der Zwaan, Alex'  
**Cc:** [REDACTED]  
**Subject:** RE: RAPS.com: U.S. attorneys in ECHR under Tymoshenko case to cost Ukraine \$12,5k

My goodness, you are very good value. I suggest that you stick to the agreed reactive statement, if you receive any enquiries. On the fees issue, if asked, I would say that this is the client's prerogative to comment upon but your policy is to treat it as confidential and make no further comment. But it's clearly a number that will be greeted with considerable scepticism.

The more serious concern is the perception of a conflict of interest. Why has [REDACTED] done this? It seems extraordinarily stupid to have volunteered the information at this time, before your Report has been published. I think you will need to be ready to answer questions on this robustly, to explain very clearly how scrupulously you have undertaken your review, without fear or favour, and that the conclusions will pull no punches.

---

**From:** Van Der Zwaan, Alex [REDACTED]  
**Sent:** 22 June 2012 16:41  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: RAPS.com: U.S. attorneys in ECHR under Tymoshenko case to cost Ukraine \$12,5k

[REDACTED]

See below . Would be interested to know your thoughts.

Alex

**Alex R. van der Zwaan**  
Associate  
Seddon, Arps, Slate, Meagher & Flinn (UK) LLP  
[REDACTED]

 Please consider the environment before printing this email

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**From:** [REDACTED]  
**Sent:** Friday, June 22, 2012 3:15 PM

GOVERNMENT  
EXHIBIT  
U.S. v. MANAFORT, 1:17-cr-201 (A.B.J.)  
**1357**

CONFIDENTIAL

[REDACTED] 003080



To: [REDACTED]  
Cc: [REDACTED]  
Subject: RAPSI.com: U.S. attorneys in ECHR under Tymoshenko case to cost Ukraine \$12,5k

U.S. attorneys in ECHR under Tymoshenko case to cost Ukraine \$12,5k

**KIEV, June 22 - RAPSI.** The U.S. law firm Skadden will cooperate with the Ukrainian Justice Ministry as part of former Prime Minister Yulia Tymoshenko's lawsuit in the European Court of Human Rights, and charge the country no less than \$12,500, [REDACTED] said on Friday.

In August 2011, Tymoshenko submitted to the European court an appeal against her arrest. Her defense submitted to the court additional documents on the violation of her right to a fair trial.

The Justice Ministry attracted Skadden to take part in the process under Tymoshenko's procedure in the court in late May. Earlier [REDACTED] said Skadden is a leading firm.

The Justice Ministry entered into a contract with the firm worth 100,000 hryvnas (\$12,500) in accordance with Ukrainian legislation [REDACTED] said.

A Kiev district court sentenced Tymoshenko in October 2011 to seven years in prison for abuse of power in signing gas contracts between [REDACTED]

The judge declared that Tymoshenko abused her position as prime minister and issued directives regarding gas contract negotiations in Moscow, which were poorly documented and lacked the government's consent.

Tymoshenko has been diagnosed with a spinal disc herniation.

German doctors have been treating her at a [REDACTED] hospital since May 9.

\*\*\*\*\*

To ensure compliance with Treasury Department regulations, we advise you that, unless otherwise expressly indicated, any federal tax advice contained in this message was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties under the Internal Revenue Code or applicable state or local tax law provisions or (ii) promoting, marketing or recommending to another party any tax-related matters addressed herein.

\*\*\*\*\*  
\*\*\*\*\*

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

\*\*\*\*\*

# **EXHIBIT 1486**



**Subject:** Dinner / Manafort, [REDACTED] & [REDACTED] reservation under [REDACTED]  
**Location:** Capitol Hill Club 300 First Street, SE Washington, DC 20003

**Start:** 3/19/2013 11:00 PM  
**End:** 3/20/2013 1:00 AM  
**Show Time As:** Busy

**Recurrence:** (none)

**Meeting Status:** Organizer

**Organizer:** [REDACTED]  
**Required Attendees:** Paul Manafort, [REDACTED] Rick Gates  
**Optional Attendees:** [REDACTED]

[REDACTED] and Paul to have Dinner with [REDACTED] March 19 at 7pm time may be moved up, depending on vote....

**Cc:** Rick and [REDACTED]

**From:** [REDACTED]  
[REDACTED]

# **EXHIBIT 1608**

---

**From:** [REDACTED]  
**To:** [REDACTED]  
**Sent:** 5/4/2012 6:35:31 PM  
**Subject:** Send to Rick?

Want me to send to Rick, or you?

-----Original Message-----

**From:** [REDACTED]  
**Sent:** Friday, May 04, 2012 2:33 PM  
**To:** [REDACTED]  
**Subject:** RE: Have

[REDACTED] pls send to rick to have centre send to us

-----Original Message-----

**From:** [REDACTED]  
**Sent:** Friday, May 04, 2012 10:17 AM  
**To:** [REDACTED]  
**Subject:** RE: Have

This could work, but one condition: Either [REDACTED]'s counsel or I should draft the statement they sign.

Under the FARA statute and under the forms, we need to ensure that ECFMU is not "directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part" by a government of a foreign country or a political party. See 22 USC 611.

-----Original Message-----

**From:** [REDACTED]  
**Sent:** Friday, May 04, 2012 9:55 AM  
**To:** [REDACTED]  
**Subject:** Fw: Have

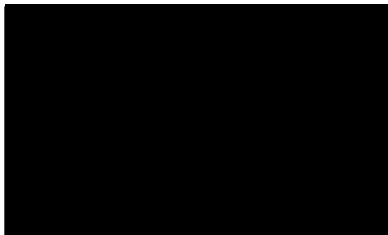
Spoke last night

He will send us statement that centre gets no funding from gov or party We should put them under a continuing duty to report on this issue Then LDA file

[REDACTED]



[REDACTED]



----- Original Message -----

From: Rick Gates [mailto:[REDACTED]]

Sent: Thursday, May 03, 2012 06:17 PM

To: [REDACTED]

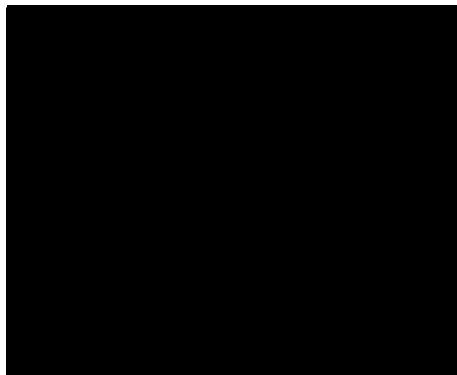
Subject: Re: Have

No worries. Call back when you can. Thanks.

On May 3, 2012, at 6:17 PM, [REDACTED] > wrote:

> To wait 20 minutes to talk

>



# **EXHIBIT 1763**



From: [REDACTED]  
Date: November 29, 2012 1:12:18 PM EST  
To: Rick Gates [REDACTED]  
Cc: [REDACTED]  
Subject: RE: Assessment

Rick,

I have attached our assessment. Please let us know if you have any questions or comments

Best,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (d) ; (c) [REDACTED]

PLEASE NOTE NEW ADDRESS

The information contained in this transmission is attorney privileged and/or confidential information intended for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

From: Rick Gates [REDACTED]  
Sent: Thursday, November 29, 2012 8:49 AM

GOVERNMENT  
EXHIBIT  
U.S. v. MANAFORT, 1:17-cr-201 (A.B.J.)  
**1763**

[REDACTED]

To: [REDACTED]  
Cc: [REDACTED]  
Subject: Assessment

[REDACTED]

Sorry for the fire drill but I need some input from you by 100pm today. I need you guys to pull some notes from each firm that pertain to an assessment on the client and our efforts. In simple terms, I need to know, from your perspective, the following:

1. What has gone well with the project
2. What can be done better (strategy, communications, planning, etc.)
3. Reviewing the last 6-months what are the strengths and weaknesses you have seen (this can include those of the team and those of the client. For example, the Durbin resolution showed us that the client is extremely weak in Congress even with an Embassy present)

As we know in this business, client relationships are an evolving process. We do not need to get into strategy here. Call this your thoughts over the last 6-months. I need to take your material and create a larger document that will be used to brief the President. There will be no attributions. This will be deemed an assessment by Paul on what Ukraine has done well and what it can do better as we move into 2013. It does not need to be polished as it is more notes for me to build the larger document. It can be in bullet format or how ever you like. Call me if you have any questions. Thanks.

1. What has gone well with the project?

- Our outreach to most offices on the Hill and opinion leaders in DC have been well received, but in order to maintain credibility, we must deliver surrogates that we set up meetings for.
- Crisis communication, from both the client perspective and our perspective has been well defined.
- Election communication and strategy. The constant flow of information enabled our team to thoroughly and comprehensively update third parties that were interested in the elections.
  - Reporters responded well to our daily outreach because there was substance to them.
- @modern\_ukraine receives a good level of engagement on Twitter and has high-quality followers. There has been good communication here between MCW and FH.

2. What can be done better (strategy, communications, planning, etc.). Reviewing the last 6-months what are the strengths and weaknesses you have seen (this can include those of the team and those of the client. For example, the Durbin resolution showed us that the client is extremely weak in Congress even with an Embassy present).

- We need to re-start our outreach in 2013 with a proactive, systematic approach.
  - Define our messaging.
  - Concentrate our outreach.
  - Build relationships with the new leadership of both Senate Foreign Relations and House Foreign Affairs Committees.
  - Manufacture initiatives to engage US opinion leaders.
  - Develop an early warning system within the Administration and State Department to alert us of possible actions and statements regarding Ukraine.
- Major problem: Fire drills & trip dysfunction. In order to do our work well, we need time. This will allow our team to eliminate scrambling to see who is available to do our meetings, and enable our team to really get the most beneficial meetings for Ukrainian officials.
  - Embassy double-booking and/or taking the lead on meetings we set up (without our knowledge). We need to better open the lines of communication between our organization and the Embassy.
- The ECFMU has withstood initial scrutiny and has started to become a voice that opinion leaders consider. In order to become more credible, we need to initiate the following to become more visible and build a reputation:
  - Programming throughout 2013 in DC (and possibly NYC)
  - A new leader of the ECFMU that can be a credible, reliable and relatively unbiased voice.
  - Consideration of a Washington voice/official of the ECFMU in Washington, and/or an Executive Director of the US Allies Project (same criteria as ECFMU leader in Brussels).
  - Surrogates (foreign policy analysts, human rights experts, etc.) both on contract and not, that we can work to cycle in to panels and conversations led by NGO's that involve Ukraine in regular intervals.



- Interactions that don't involve airplanes – utilizing available technology (Skype, teleconferencing, etc.) that will allow Ukrainian leaders to connect with U.S. elites without having to travel.
- Media engagement. Outside of the elections, it has been difficult to drive a narrative with the press corps without surrogates that can deliver meaningful news that relates to the US. We need to develop and manufacture initiatives and programming to enable ECFMU to engage media in a purposeful way with a more tangible and action-oriented pitch.
  - To this end, our blogger program during the election-season produced impactful results. We strongly recommend restarting this program to help develop the aforementioned initiatives and programming.
  - We also recommend increasing our access to Facebook so that we can work to make it as engaging as our current Twitter account.
  - The website upgrade that was talked about a few months back is also strongly encouraged in order to increase functionality from the current word press website.
- It would be helpful for our team to analyze a list of available surrogates for the Centre. We think it would be productive to go through the list and give accurate assessments on the plausible success that each visitor would have and the attention that the visits would receive. This would allow us to plan far ahead of time for who we would target with each visitor.
- Opposition conversations. We need to change tactics regarding the opponents that we face in the US. Knowing that we will not convert opponents, we need to let the air out of the room and slowly chip away at opponents (ex: [REDACTED] have been engaged in conversations that we have had with them and have both reached out to us regarding their concerns and points of view).
  - We have to define what we are saying and who we need to be saying it to.

# **EXHIBIT 1937**

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**From:** [REDACTED]  
**To:** Rick Gates  
**CC:** [REDACTED]  
**Sent:** 11/19/2013 12:50:29 AM  
**Subject:** Fwd: [REDACTED] RESOLUTION CALLING FOR THE RELEASE OF FORMER UKRAINE PRIME MINISTER YULIA TYMOSHENKO PASSES US SENATE  
**Attachments:** ATT00001.htm; ATT00002.htm; ATT00003.htm; BILLS-113sres165rs.pdf; [REDACTED] Ukraine Res Floor - Final.pdf; image001.png

Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED]  
**Date:** November 18, 2013 at 7:34:42 PM EST  
**To:** [REDACTED]  
**Subject:** Fw: [REDACTED] RESOLUTION CALLING FOR THE RELEASE OF FORMER UKRAINE PRIME MINISTER YULIA TYMOSHENKO PASSES US SENATE

Here's [REDACTED] statement and his joint statement with [REDACTED]

[REDACTED] Principal

[REDACTED]

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For Immediate Release

Contact:



November 18, 2013

**RESOLUTION CALLING FOR THE RELEASE OF FORMER UKRAINE  
PRIME MINISTER YULIA TYMOSHENKO PASSES US SENATE**

*Tymoshenko Has Been Held Since 2011 on Politically Motivated Charges*

Washington, D.C. - [REDACTED] and member of the Senate Foreign Relations Committee, [REDACTED] today led the unanimous passage of a Senate resolution calling for the release of Ukraine's former Prime Minister, Yulia Tymoshenko.

In 2011, Tymoshenko was sentenced to seven years in prison for allegedly abusing her power in the awarding of a natural gas contract. Numerous political and human rights groups have called the charges politically motivated and selectively prosecuted and called for Tymoshenko's release.

***[REDACTED] said: "I am dismayed by the seeming inability to find a reasonable compromise that would allow Ms. Tymoshenko to be released to seek medical treatment abroad, a move that would allow us to instead focus on strengthening the important ties between the US, EU, and Ukraine. Just last week, after two years of dithering on finding a solution, the Ukrainian Parliament postponed a vote on a bill that would have secured Tymoshenko's release. So today, I've offered, and the Senate has***

***unanimously approved, a resolution calling for the immediate release of Yulia Tymoshenko."***

***"There is still time to find a solution before the Eastern partnership Summit takes place at the end of this month, so I am hopeful that our friends in Ukraine will be able to find an honorable way forward that puts the best interest of their country first and ends Ms. Tymoshenko's detention."***

[REDACTED] ***"President Yanukovich should seize a historic opportunity for the Ukraine by freeing former Prime Minister Yulia Tymoshenko from jail, and agreeing to a crucial trade and political agreement with the European Union," said Sen.***

[REDACTED] ***"This is a moment requiring presidential leadership to create an opportunity for a more hopeful and prosperous future for the Ukraine, not a time to step backward and retreat on the march toward increased democracy and freedom. President Yanukovich needs to make the right decision, sign the Association Agreement with the European Union, and take the necessary steps to achieve this important goal."***

Since her trial and imprisonment in 2011, numerous human rights groups and government around the world, as well as the European Court of Human Rights, have called the charges politically motivated and called for Ms. Tymoshenko's release.

The Parliamentary Assembly Council of Europe passed a resolution in January 2012, declaring that the articles under which Ms. Tymoshenko was convicted were, "overly broad in application and effectively allow for ex post facto criminalization of normal political decision making."

Later that year, both the European Parliament and the U.S. Senate passed resolutions condemning the sentencing of Ms. Tymoshenko and calling for her release.

In late April, The European Court of Human Rights ruled that Ms. Tymoshenko's pre-trial detention was unlawful, that the lawfulness of her detention had not been properly reviewed, that her right to liberty had been restricted, and that she had no possibility to seek compensation for her unlawful deprivation of liberty.

Video of [REDACTED] floor remarks on the resolution will be available here. A copy of the resolution – cosponsored by [REDACTED] [REDACTED] – is attached along with Senator [REDACTED] prepared remarks on the measure.







III

**Calendar No. 95**

113TH CONGRESS  
1ST SESSION

# **S. RES. 165**

Calling for the release from prison of former Prime Minister of Ukraine Yulia Tymoshenko in light of the recent European Court of Human Rights ruling.

---

IN THE SENATE OF THE UNITED STATES

JUNE 10, 2013

JUNE 25, 2013

Reported by [REDACTED], with an amendment and an amendment to the preamble

[Strike out all after the resolving clause and insert the part printed in italic]

[Strike the preamble and insert the part printed in italic]

---

## **RESOLUTION**

Calling for the release from prison of former Prime Minister of Ukraine Yulia Tymoshenko in light of the recent European Court of Human Rights ruling.

~~Whereas, in August 1991, the Ukrainian Parliament declared independence from the Soviet Union and approved decrees to mint its own currency and take command of all Soviet military units on its soil;~~

Whereas, in December 1991, 90 percent of Ukrainians voted in a referendum to support independence from the Soviet Union;

Whereas Ukraine has experienced increased economic and political cooperation with Europe and the United States since its independence from the Soviet Union;

Whereas, in 1996, Ukraine adopted its first democratic constitution that included basic freedoms of speech, assembly, religion, and press;

Whereas, in 2004, Ukrainians organized a series of historic protests, strikes, and sit-ins known as the “Orange Revolution” to protest electoral fraud in the 2004 presidential election;

Whereas Yulia Tymoshenko was a leader of the Orange Revolution and was first elected as Prime Minister in 2005;

Whereas, in the 2010 presidential election, incumbent President Viktor Yushchenko won only 5.5 percent in the first round of voting, which left former Prime Minister Viktor Yanukovich and then Prime Minister Yulia Tymoshenko to face one another in a run-off election;

Whereas Mr. Yanukovich defeated Ms. Tymoshenko by a margin of 49 percent to 44 percent;

Whereas, on October 11, 2011, Ms. Tymoshenko was found guilty and sentenced to seven years in prison on charges that she abused her position as Prime Minister in connection with a Russian natural gas contract;

Whereas, on January 26, 2012, the Parliamentary Assembly Council of Europe (PACE) passed a resolution (1862) that declared that the articles under which Ms. Tymoshenko was convicted were “overly broad in applica-

tion and effectively allow for ex post facto criminalization of normal political decision making”;

Whereas, on May 30, 2012, the European Parliament passed a resolution (C153/21) deploring the sentencing of Ms. Tymoshenko;

Whereas, on September 22, 2012, the United States Senate passed a resolution (S. Res. 466, 112th Congress) that condemned the selective and politically motivated prosecution and imprisonment of Yulia Tymoshenko, called for her release, and called on the Department of State to institute a visa ban against those responsible for the imprisonment of Ms. Tymoshenko and the other political leaders associated with the 2004 Orange Revolution;

Whereas, on April 7, 2013, President of Ukraine Viktor Yanukovich pardoned former interior minister Yuri Lutsenko and several other opposition figures allied with Ms. Tymoshenko;

Whereas, on April 30, 2013, the European Court of Human Rights, which settles cases of rights abuses after plaintiffs have exhausted appeals in their home country courts, ruled that Ms. Tymoshenko’s pre-trial detention had been arbitrary; that the lawfulness of her detention had not been properly reviewed; that her right to liberty had been restricted; and, that she had no possibility to seek compensation for her unlawful deprivation of liberty;

Whereas, on April 30, 2013, [REDACTED] [REDACTED] [REDACTED] [REDACTED] reiterated the United States call that Ms. Tymoshenko “be released and that the practice of selective prosecution end immediately” in light of the European Court of Human Rights decision;

Whereas Ukraine hopes to sign an association agreement with the European Union during the Eastern Partnership Summit in November 2013; and

Whereas, after the European Court of Human Rights ruling, [REDACTED] [REDACTED] [REDACTED] [REDACTED] stated that “Ukraine is still miles away from fulfilling European standards” and must “end its selective justice” before signing the association agreement. Now, therefore, be it

*Whereas, in August 1991, the Ukrainian Parliament declared independence from the Soviet Union and approved decrees to mint its own currency and take command of all Soviet military units on its soil;*

*Whereas, in December 1991, 90 percent of Ukrainians voted in a referendum to support independence from the Soviet Union;*

*Whereas Ukraine has experienced increased economic and political cooperation with Europe and the United States since its independence from the Soviet Union;*

*Whereas, in 1996, Ukraine adopted its first democratic constitution that included basic freedoms of speech, assembly, religion, and press;*

*Whereas in 2004, Ukrainians organized a series of historic protests, strikes, and sit-ins known as the “Orange Revolution” to protest electoral fraud in the 2004 presidential election;*

*Whereas Yulia Tymoshenko was a leader of the Orange Revolution and was first elected as Prime Minister in 2005;*

*Whereas, in the 2010 presidential election, incumbent President Viktor Yushchenko won only 5.5 percent in the first round of voting, which left former Prime Minister Viktor*

*Yanukovich and then Prime Minister Yulia Tymoshenko to face one another in a run-off election;*

*Whereas Mr. Yanukovich defeated Ms. Tymoshenko by a margin of 49 percent to 44 percent;*

*Whereas, on October 11, 2011, Ms. Tymoshenko was found guilty and sentenced to seven years in prison on charges that she abused her position as Prime Minister in connection with a Russian natural gas contract;*

*Whereas, on January 26, 2012, the Parliamentary Assembly Council of Europe (PACE) passed a resolution (1862) that declared that the articles under which Ms. Tymoshenko was convicted were “overly broad in application and effectively allow for ex post facto criminalization of normal political decision making”;*

*Whereas, on May 30, 2012, the European Parliament passed a resolution (C153/21) deploring the sentencing of Ms. Tymoshenko;*

*Whereas, on September 22, 2012, the United States Senate passed a resolution (S. Res 466, 112th Congress) that condemned the selective and politically motivated prosecution and imprisonment of Yulia Tymoshenko, called for her release based on the politicized charges, and called on the Department of State to institute a visa ban against those responsible for the imprisonment of Ms. Tymoshenko and the other political leaders associated with the 2004 Orange Revolution;*

*Whereas, on April 7, 2013, President of Ukraine Viktor Yanukovich pardoned former interior minister Yuri Lutsenko and several other opposition figures allied with Ms. Tymoshenko;*

*Whereas, on April 30, 2013, the European Court of Human Rights, which settles cases of rights abuses after plaintiffs have exhausted appeals in their home country courts, ruled that Ms. Tymoshenko's pre-trial detention had been arbitrary; that the lawfulness of her pre-trial detention had not been properly reviewed; that her right to liberty had been restricted; and, that she had no possibility to seek compensation for her unlawful deprivation of liberty;*

*Whereas, on April 30, 2013, [REDACTED] reiterated the United States call that Ms. Tymoshenko "be released and that the practice of selective prosecution end immediately" in light of the European Court of Human Rights decision;*

*Whereas Ukraine hopes to sign an association agreement with the European Union during the Eastern Partnership Summit in November 2013; and*

*Whereas, after the European Court of Human Rights ruling, [REDACTED] stated that "Ukraine is still miles away from fulfilling European standards" and must "end its selective justice" before signing the association agreement: Now, therefore, be it*

1        *Resolved, That the Senate—*

2            *(1) calls on the Government of Ukraine to re-*  
 3        *lease former Prime Minister Yulia Tymoshenko from*  
 4        *imprisonment in light of the April 2013 European*  
 5        *Court of Human Rights verdict;*

6            *(2) calls on the European Union members to in-*  
 7        *clude the release of Ms. Tymoshenko from imprison-*  
 8        *ment as an important criterion for signing an asso-*

1        ciation agreement with Ukraine at the upcoming  
2        Eastern Partnership Summit in Lithuania;

3        ~~(3)~~ expresses its belief and hope that Ukraine's  
4        future rests with stronger ties to Europe, the United  
5        States, and others in the community of democracies;  
6        and

7        ~~(4)~~ expresses its concern and disappointment  
8        that the continued selective and politically motivated  
9        imprisonment of former Prime Minister Yulia  
10       Tymoshenko unnecessarily detracts from Ukraine's  
11       otherwise strong relationship with Europe, the  
12       United States, and the community of democracies.

13       *That the Senate—*

14       *(1) calls on the Government of Ukraine to release*  
15       *former Prime Minister Yulia Tymoshenko from im-*  
16       *prisonment based on politicized and selective charges*  
17       *and in light of the April 2013 European Court of*  
18       *Human Rights verdict;*

19       *(2) calls on the European Union members to in-*  
20       *clude the release of Ms. Tymoshenko from imprison-*  
21       *ment based on politicized and selective charges as a*  
22       *criterion for signing an association agreement with*  
23       *Ukraine at the upcoming Eastern Partnership Sum-*  
24       *mit in Lithuania;*

1           (3) expresses its belief and hope that Ukraine's  
2           future rests with stronger ties to Europe, the United  
3           States, and others in the community of democracies;  
4           and

5           (4) expresses its concern and disappointment  
6           that the continued selective and politically motivated  
7           imprisonment of former Prime Minister Yulia  
8           Tymoshenko unnecessarily detracts from Ukraine's  
9           otherwise strong relationship with Europe, the United  
10          States, and the community of democracies.





**Calendar No.95**

113TH CONGRESS  
1ST SESSION

**S. RES 165**

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**RESOLUTION**

Calling for the release from prison of former Prime Minister of Ukraine Yulia Tymoshenko in light of the recent European Court of Human Rights ruling.

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JUNE 25, 2013

Reported with an amendment and an amendment to the preamble

&lt;&lt;

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**Senator [REDACTED]  
Ukraine Resolution  
November 18, 2013**

*As Prepared for Delivery*

Mr. President, I rise today to speak on the continued imprisonment of former Ukrainian Prime Minister, Ms. Yulia Tymoshenko. Sadly, for over two years now, Ms. Tymoshenko has been languishing in prison on politicized charges that she allegedly abused her position in connection with a Russian natural gas contract.

Now, I am not going to judge the wisdom of that gas contract – one of an endless series of policy decisions any chief executive has to make in any nation.

But this is an imprisonment that has been recognized by the international community, countless human rights organizations, and by the European Court on Human Rights, as selectively prosecuted and politically motivated. This is an imprisonment that has a whiff of neighboring Belarus, where those who run for President against strongman Alexander Lukashenko get thrown in jail – not of Ukraine, which is looking to solidify its hard fought place among the community of democracies.

When I visited Ukraine last May, I had the opportunity to meet with President Yanukovich, the prime minister, and the foreign minister. I was most grateful for their time. During those discussions I was repeatedly assured that Ms. Tymoshenko's imprisonment would be solved.

But it wasn't.

So last year, [REDACTED] I introduced a Senate Resolution calling for Mr. Tymoshenko's release.

The resolution passed unanimously last September.

And yet, here we are today, more than a year later and a few weeks before an important opportunity for Ukraine to strengthen its ties to the West by potentially signing an association agreement with the European Union, and Tymoshenko is still in jail.

Mr. President, this is an embarrassment. This is a costly distraction from all the other very important issues Ukraine and its friends have to work on together. It plays into Russian President Putin's hands – who would like nothing more than to see the EU association agreement scuttled because of the failure to release Ms. Tymoshenko.

Why would Ukraine's leaders want to succumb to Russian bullying and jeopardize stronger economic and political ties to the West over a simple grudge regarding the previous prime minister?

Mr. President, I am dismayed by the seeming inability to find a reasonable compromise that would allow Ms. Tymoshenko to be released to seek medical treatment abroad, a move that would allow us to instead focus on strengthening the important ties between the US, EU, and Ukraine.

Ukraine is our friend and ally. It helped us in Libya and Afghanistan. Its leadership rightly sees Ukraine's future with the West.

But when you join the community of democracies you simply do not throw your former political opponents in jail over policy agreements.

You instead offer better ideas and best them in elections.

That is why this summer, regrettably, I introduced a follow-up resolution again calling for the release of Ms. Tymoshenko. I am happy to note that Senators [REDACTED] [REDACTED] joined me on that resolution.

And let me add that's not a group of Senators that you see agree on too many issues in this Senate. But we agree on this.

For months, we have been waiting, assured that a resolution to Ms. Tymoshenko's case would come to fruition.

We saw Ukraine take promising steps toward political reform. We saw some of Ms. Tymoshenko's allies pardoned.

And over the course of the last few weeks in particular, we were optimistic that negotiations led by former [REDACTED] and [REDACTED] [REDACTED] were seemingly making headway toward a solution in which Ms. Tymoshenko would leave to Germany for medical treatment.

We were hopeful that such a solution could come in time for Ukraine to sign an association agreement with the EU during the Eastern Partnership Summit in Vilnius at the end of this month, a step strongly supported in the United States.

We held off on passage of this resolution with the hope that real progress would soon take place.

But, last Wednesday, after two years of dithering on finding a solution, the Ukrainian Parliament postponed a vote on a bill that would have secured such a resolution – a move that only adds to the long list of missed opportunities.

And that is why today, disappointingly, my colleagues and I have decided to move forward and pass this resolution.

There is still time to find a solution before the Eastern partnership Summit takes place at the end of this month, so I am hopeful that our friends in Ukraine will be able to find an honorable way forward that puts the best interest of their country first and ends Ms. Tymoshenko's detention.

In the meantime, Mr. President, I ask unanimous consent to pass S. Res. 165, as reported out of the Foreign Relations Committee.



# **EXHIBIT 2012**

## MEMORANDUM

TO: Honorable [REDACTED]  
[REDACTED]

FROM: [REDACTED]

SUBJECT: Projects and Plans

DATE: April 5, 2012

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At our meeting today, you asked me to lay a plan of action – and a proposed schedule – for the projects that we discussed. Broadly speaking, the project will consist of Skadden's lawyers providing legal services to the Government of Ukraine that include providing advice on the rule of law and providing consultation with respect to principles of due process as applied in the criminal justice system.

### 1. The First Project

The first project is to conduct an inquiry about the process and the procedures used to prosecute former Prime Minister Tymoshenko, and to write a report addressing various questions that arise with respect to her prosecution, trial and sentencing.

It is important at the outset for the Government of Ukraine to know that Skadden is only willing to take on this assignment with the understanding that Skadden's lawyers will be given adequate access to sources of information and individuals with first-hand knowledge of the case as a basis for writing the report. It is also important that the Government of Ukraine understand that Skadden's work product, Skadden's report to the Ministry of Justice and Skadden's professional opinion will be rendered in good faith and with total independence.

It is understood by all parties that this work will be conducted under the protection of attorney-client and work product privilege, and that any decision about disclosure will be entirely up to the Government of Ukraine.

In the course of this project, Skadden will conduct an evaluation of the investigation, the charging decision, prosecution, conviction and sentencing of former Prime Minister Yulia Tymoshenko and write a report to the Ministry of Justice evaluating that process through the prism of American standards of due process. We are not being asked to comment on the guilt or innocence of Ms. Tymoshenko. Generally speaking, we are being asked to provide a professional opinion – based on our own experience in the American criminal justice system – as to whether she got a fair trial.

To that end, we will consider the following questions that arise with respect to the prosecution, trial and sentencing of Yulia Tymoshenko:

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- Was the crime that she was charged with legitimate? Was there any problem with vagueness or adequate notice? We will look at the provision of the Ukrainian criminal code that she was alleged to have violated – and convicted of violating – and we will try to determine whether there are comparable statutes in the United States or in Western Europe and whether there have been comparable prosecutions.
- Was the investigation thorough and fair, and was the charging decision justified by the evidence? We will look at the methodology and means used to investigate and charge her, and we will opine on two aspects of this question: (1) whether the investigation or the charging decision in any respect could be improved; and (2) whether her rights were or were not violated in the course of the investigation and the charging decision made as a result of the investigation.
- Was the trial fair? Were the judges experienced, independent and fair-minded? What was the process by which the prosecutor presented incriminating evidence to the court?
- Was she afforded due process of law? We will look at whether she was given a fair opportunity to defend herself and to make legal and factual arguments as to her innocence. Was she represented by experienced counsel? Was she given a fair trial and afforded due process of law?
- Was the sentence excessive? We will look at the sentencing decision, whether it was within the realm of reason, or whether it was unduly harsh. Was she given adequate opportunity to argue for leniency and to present evidence supporting that argument?

In our view, it will be necessary for our lawyers to have access to individuals representing the following five categories of witnesses to carry out our assignment:

- Investigator(s)
- Prosecutor(s)
- Judge(s)
- Witness(es)
- Legal Expert

#### Schedule for the First Project

We anticipate that it will require a total of two weeks of work on the ground in Ukraine to carry out this assignment. We hope to be able to meet with you and your assistants during the week of April 9, 2012 at which time you will identify those individuals who should be interviewed, and we will set up a schedule of appointments to carry out those interviews. If such appointments can be arranged to occur during that same week, it will speed the process. In any event, we would hope that the interviews could be concluded by the end of the month of April. We would

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use the month of May to carry out any additional interviews and research that may be required, and it is our hope that we will be able to provide you with a draft report by the end of May 2012.

2. The second project

You have expressed an interest in consulting with us and seeking advice relating to the prosecution of Ms. Tymoshenko scheduled to begin on April 15. To that end, you have agreed that it would be beneficial for a Skadden lawyer who is experienced in criminal prosecutions and who has participated in criminal prosecutions in the United States to meet with the trial team engaged in the prosecution of Tymoshenko. We would hope that a team of Skadden lawyers could travel to Ukraine during the week of April 9 or – at the latest – the week of April 16<sup>th</sup> to meet with members of the Tymoshenko trial team.

Again, please understand that all communications between Skadden lawyers and lawyers for Ukraine will be confidential and covered by the attorney-client privilege, and all work-product prepared by Skadden lawyers for use in this assignment will be protected by the work-product privilege.

*Confidential  
Attorney-Client Privilege*

# **EXHIBIT 2013**



**From:** [REDACTED]  
**Sent:** Wednesday, April 11, 2012 1:21 PM  
**To:** [REDACTED]  
**Subject:** FW: Tomorrow--Friday 4/6

When you get information about when we will be meeting with the trial team in Karkiv, we can see if Victor can get us a plane. See below.

-----Original Message-----

**From:** [REDACTED]  
**Sent:** Wednesday, April 11, 2012 7:20 AM  
**To:** [REDACTED]  
**Subject:** Re: Tomorrow--Friday 4/6

If you give me a precise idea of your travel plans, I will go back to him asap. Please let me know when you have decided to travel and would like the plane. Thanks.

Sent via BlackBerry from T-Mobile

-----Original Message-----

**From:** [REDACTED]  
**Date:** Wed, 11 Apr 2012 07:08:22  
**To:** [REDACTED]  
**Subject:** Re: Tomorrow--Friday 4/6

Victor asked us to come to him if ever we need his help. We are returning to Ukraine to meet with the Tymoshenko trial team in Karkiv on Thursday or Friday. Rather than spending 4 hours on the road to get to Karkiv -- and another 4 to get back -- it would be great if we could use a small plane to get there and back. Any hope that Victor could help with that?

----- Original Message -----

**From:** [REDACTED]  
**Sent:** Saturday, April 07, 2012 09:13 AM  
**To:** [REDACTED]  
**Subject:** Re: Tomorrow--Friday 4/6

Spoke to Victor. Very impressed and pleased with the meeting as well. Suggest you give Paul a similar briefing to the one you provided me. Safe travels and get some rest.

Sent via BlackBerry from T-Mobile

-----Original Message-----

**From:** [REDACTED]  
**Date:** Fri, 6 Apr 2012 09:31:16  
**To:** [REDACTED]  
**Subject:** Re: Tomorrow--Friday 4/6

I will call you tomorrow. Can you give me a good phone number for me to call you?

----- Original Message -----

**From:** [REDACTED]  
**Sent:** Friday, April 06, 2012 06:56 AM  
**To:** [REDACTED]  
**Subject:** Re: Tomorrow--Friday 4/6

Yes sure...would prefer if you could call me tomw so I might reach Victor over the weekend to expedite and facilitate. Needless to say

I will do all I can within my power to get done what needs to get done to keep things on track. Thanks very much.

Sent via BlackBerry from T-Mobile

-----Original Message-----

From: [REDACTED]  
Date: Fri, 6 Apr 2012 04:03:32  
To: [REDACTED]  
Subject: Re: Tomorrow--Friday 4/6

We just had breakfast with Mr. [REDACTED] I thought it went well but you will have to check with him. I need to talk to you about funding this project. We are wanted and needed right away, e.g., next week, but we can't deploy without payment in advance. We have two projects in addition to the report we discussed -- (1) helping the trial team in the second prosecution, and; (2) advising the Justice Ministry about Tymoshenko's case in the European Human Rights Court. Are you around on Monday?

----- Original Message -----

From: [REDACTED]  
Sent: Thursday, April 05, 2012 07:09 AM  
To: [REDACTED]  
Subject: Re: Tomorrow--Friday 4/6

Thanks very much, [REDACTED]  
Sent via BlackBerry from T-Mobile

-----Original Message-----

From: [REDACTED]  
Date: Thu, 5 Apr 2012 06:57:10  
To: [REDACTED]  
Subject: Re: Tomorrow--Friday 4/6

Perfect. We will be in the lobby at 720 am tomorrow. There are 3 of us: [REDACTED]

----- Original Message -----

From: [REDACTED]  
Sent: Thursday, April 05, 2012 06:46 AM  
To: [REDACTED]  
Subject: Tomorrow--Friday 4/6

Dear [REDACTED]

Hope your trip is going well.

Wanted to confirm that you and your colleagues will be picked up in front of the Intercontinental Hotel at 720am Friday morning.

Breakfast should not take more than 1 hour and you should be back at your hotel before 930am.

Please confirm that you have gotten this message.

Thanks as always.

All best,

[REDACTED]  
Sent via BlackBerry from T-Mobile



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# **EXHIBIT 2069**



**From:** [REDACTED]  
**Sent:** Thursday, August 09, 2012 9:46 PM  
**To:** [REDACTED]  
**Subject:** RE: Kyiv Post Editorial: Skadden Stink

Does Manafort have the new Kyiv Post editorial? Renewed and intensified urgency -- the "Skadden stink." The issue is about to explode, including in the American press. Far, far better to get ahead of it now while we still have a bit of a chance.

[REDACTED]

Skadden

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**From:** [REDACTED]  
**Sent:** Thursday, August 09, 2012 4:40 PM  
**To:** [REDACTED]  
**Subject:** Re: Kyiv Post Editorial: Skadden Stink

I have already told Manafort he has got to get [REDACTED] out whether voluntarily or non voluntarily.

---

**From:** [REDACTED]  
**Sent:** Thursday, August 09, 2012 04:33 PM  
**To:** [REDACTED]  
**Subject:** FW: Kyiv Post Editorial: Skadden Stink

We really need to get them to disclose the funding. The issue's going to build and build, and get worse and worse, and then there will be disclosure. First rule of damage control. Get it out there. Maybe worth a call or e-mail to Manafort (forwarding the editorial)?

[REDACTED]

Skadden

---

**From:** [REDACTED]  
**Sent:** Thursday, August 09, 2012 4:02 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Kyiv Post Editorial: Skadden Stink

Please see the below editorial, just posted on the Kyiv Post website. If there is anything more we can/should be saying beyond our approved statement and confirming involvement at this point, please let us know ASAP.

## **Skadden Stink**

Aug. 9, 2012, 9:50 p.m. | [Editorial](#) — by **Kyiv Post**



On Aug. 28, Yulia Tymoshenko will clash with her own government in the European Court for Human Rights. She will claim that her rights were violated, including the right to a fair trial, in a case that sent her to prison for seven years for abuse of office.

The government is preparing its defense with the help of American law company Skadden. But this cooperation is highly suspicious with very few details about the contract being revealed, and those that are made public raising even more questions.

The government claims that Skadden, a top American firm with an annual turnover of \$2.17 billion, works for a mere \$12,000 for Ukraine's government. None of the company's expenses is paid, including expensive flights and stay in Fairmont Hotel, where prices start at 300 euros per night.

Skadden representatives have visited Ukraine at least three or four times. In at least one of the cases the team was made up of two partners from the Washington office, plus two associates. One of the partners, [REDACTED] normally charges \$1,065 per hour, according to the Wall Street Journal.

The group stayed in Ukraine for several days and visited the imprisoned Tymoshenko in Kharkiv during a trip in June. That trip alone would have cost many times more than the ridiculous \$12,000 the government claims it is paying.

These facts fuel speculation that Skadden is being paid by someone on the side. No one knows who is paying Skadden, and it's a question the company is ignoring. So the public may never know of conflicts of interest, or worse things, that may lurk behind this arrangement.

We hope that Skadden will address these serious concerns. We hope that US anti-corruption bodies are also looking into this issue, since there is little hope that the case will be investigated in Ukraine. Another question is what kind of report Skadden will produce, and how it will be used.

Members of the opposition suspect that parts of the report will be used to whitewash the actions of the prosecutors, the judges and everyone else who was instrumental in Tymoshenko's conviction. If that is the case, Skadden's reputation will be tarnished.

It's not too late for the company (and Ukraine's government) to set the record straight, and disclose to the public the details of this suspicious contract and who is footing the bill.

[REDACTED]

# **EXHIBIT 2078**



**From:** [REDACTED]  
**Sent:** Thursday, August 30, 2012 10:42 PM  
**To:** [REDACTED]  
**CC:** [REDACTED]  
**Subject:** Re: Project 2

[REDACTED]

While [REDACTED] has prepared a memo for distribution to the T2 team, and we had agreed a date internally to meet with them, I have not yet communicated that intention to the OPG, except in very general terms. As a result, we can let things lie for the time being, and I doubt they are expecting, or will request a meeting or any work product from us for the moment.

If they do ask us, we can discuss how to deal, but I will hold off discussing P2 with the OPG for the time being and until we hear from you on this.

---

**From:** [REDACTED]  
**Sent:** Thursday, August 30, 2012 10:04 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Project 2

You are right that everything would be better, I think, if T1 could be released and absorbed and discussed before T2 truly got underway. As you know, we got delayed because of translation time requirements. I am extremely concerned that information about Skadden's involvement in T2 has come to the attention of Tymoshenko's lawyer, and that he will use it to discredit the report at some point. We have our explanations and defenses, e.g., as rule of law consultants, we are assisting and advising Ukr on how to manage the second trial with an eye toward guaranteeing due process of law and meeting Western standards. That is what T2 is all about.

---

**From:** [REDACTED]  
**Sent:** Thursday, August 30, 2012 4:42 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: Project 2

Hi [REDACTED]

The launch and publication of the report is clearly the priority here. We fixed this date to be before the beginning of T 2 and on dates which we thought might post date publication of the report.

I hear anecdotally that there may be a further adjournment of T2 on medical grounds - which would suit because we have comments on the evidence which, ideally we would like to deliver as early as possible.

Regards

---

**From:** [REDACTED]  
**Sent:** Thursday, August 30, 2012 07:59 PM  
**To:** [REDACTED]

GOVERNMENT  
EXHIBIT  
U.S. v. MANAFORT, 1:17-cr-201 (A.B.J.)  
**2078**

Cc: [REDACTED]

Subject: Project 2

[REDACTED] just got off the phone with [REDACTED]. He told me that you [REDACTED] were planning to go over to Ukraine next week (week of September 3) for Project 2 activity. I am concerned that Skadden's activity in Project 2 might surface before the report comes out, and that would do enormous damage to the credibility of Project 1. Would you [REDACTED] be willing to talk to me some time during the day tomorrow about this concern? Thanks. [REDACTED]

# **EXHIBIT 2079**

**From:** [REDACTED]  
**Sent:** Thursday, August 30, 2012 12:10 AM  
**To:** [REDACTED]  
**Subject:** RE: Project 2

Whichever is the barbarian -- that would be you.

---

**From:** [REDACTED]  
**Sent:** Wednesday, August 29, 2012 6:57 PM  
**To:** [REDACTED]  
**Subject:** Re: Project 2

Am I the Chinese or the mongolian?

Sent from my iPhone.

On Aug 29, 2012, at 6:53 PM [REDACTED] wrote:

Since we are trying to respect the Chinese Wall aspect of the two different projects, we probably should wait to show it to you until it is closer to release.

---

**From:** [REDACTED]  
**Sent:** Wednesday, August 29, 2012 6:50 PM  
**To:** [REDACTED]  
**Subject:** Re: Project 2

Have not but would like to.

Sent from my iPhone.

On Aug 29, 2012, at 6:41 PM [REDACTED] wrote:

Thanks. We are on the verge of releasing the report. Low profile for the time being is best. Have your read the report?

---

**From:** [REDACTED]  
**Sent:** Wednesday, August 29, 2012 6:39 PM  
**To:** [REDACTED]  
**Subject:** Re: Project 2

Will do.

Sent from my iPhone.

On Aug 29, 2012, at 6:36 PM [REDACTED] wrote:

Yes



**From:** [REDACTED]  
**Sent:** Wednesday, August 29, 2012 6:17 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Project 2

We have a memo that is probably getting translated right now that was to go to them end of the week. Should we put the brakes on that?

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, August 29, 2012 6:00 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Project 2

Please do not talk to the Ukrainians or make any plans with the Ukrainians to return for purposes of advancing Project 2 unless and until you have talked with me first. Thanks

# **EXHIBIT 2106**

**From:** [REDACTED]  
**Sent:** Wednesday, November 28, 2012 3:35 PM  
**To:** Paul Manafort [REDACTED]  
**Subject:** [REDACTED] memo  
**Attachments:** WASSR01A-#1224703-v1-gbc\_memo\_to\_ukraine\_-c.DOC

**Retention:** Sent Item

Too ambitious perhaps.  
[REDACTED]





November 26, 2012

Memorandum to the File

[REDACTED]

This memorandum has two purposes: First, to discuss the strengths and weaknesses of Tymoshenko's case in the European Court of Human Rights; and Second, to distill my experience in the criminal justice system of Ukraine.

This memorandum is not to be treated as a document approved or issued by the law firm. This is my work-product and mine alone. In addition, I am writing this memorandum based on assurances of confidentiality – with the expectation that it will not be widely circulated and that it will be treated with utmost confidentiality.

### **The European Court of Human Rights**

I am not an expert on either the procedures or the precedents of the ECHR. Based on my understanding of the Tymoshenko case, however, my opinions as to the strengths and weaknesses of the appeal are as follows:

#### **Strengths of the Appeal**

- The court's decision to receive testimony from significant witnesses and to admit evidence from the prosecution when the defendant was without counsel – in the absence of any lawyer sitting at counsel's table to advise and assist the defendant – is a serious flaw in the case, both procedurally and substantively. In the United States, a reviewing court would grant a new trial.
- Taking the defendant into custody during the trial because of her obstructive behavior would not, by itself, be a violation of the defendant's basic rights in light of her conduct. Holding her for the duration of the trial and even after the trial – without providing a more detailed explanation of the reasons for her incarceration and without telling her what she has to do to get out -- would be criticized in American courts. The absence of any review could also be seen as a failure. The relief, however, would likely not be a new trial since there is no suggestion that she was prejudiced. It is possible that a court in the United States would reduce her sentence.
- The court's decisions to exclude the testimony of relevant defense witnesses, to deny her the chance to present pro-defense experts on damage calculations, and to prevent her from pursuing themes she thought to be relevant to the case, (e.g., the role of RosUkrEnergo) would prompt a reviewing court in the US to grant her a new trial.
- Despite the fact that she did not present evidence in the trial to establish that her case was a selective prosecution, a reviewing court might find that her course of conduct as Prime Minister – even if you take the prosecutor's case at face value -- did not represent an



abuse of powers as prime minister. Two reasons for this: (1) Many prime ministers have in the past directly negotiated the natural gas deals with the Russians. Her decision to order the Naftogaz CEO to sign would be seen by many as a technicality. (2) The true limits on the scope of her authority – i.e., whether she could or could not close the deal without governmental action – were uncertain and there was some confusion even among legal experts about this point. Some Western courts might find that such confusion or uncertainty or ambiguity as to the precise limits of her authority would preclude a criminal prosecution/conviction of this nature.

- The evidence of criminal intent – i.e., that she actually intended to commit a crime -- is virtually non-existent.

#### Weaknesses of the appeal

- Her own conduct. She was badly advised to behave the way she did in court – disrespectful and obstructionist. Had she conducted herself with dignity and been respectful, her position on appeal – procedurally and substantively -- would be stronger and much more sympathetic.
- Her attitude toward the process. She was badly advised to insult and attack the honor and honesty of everyone who she deemed to be against her – the judge, the prosecutors, the jailers and each and every witness against her.
- Her failure adequately to explain why she did what she did is significant. Evidence of her disregard of normal procedures, of the lack of coordination and cooperation with other leaders of government, of cloaking her own actions in secrecy – this evidence is compelling. Evidence of deceit – particularly with respect to [REDACTED] -- is powerful.

#### System of Criminal Justice in Ukraine

Over a five month period, our team of lawyers had virtually unlimited access to a group of prosecutors, investigators, staff and supervisory officials in the Ukrainian system of criminal justice. Ukraine inherited this system from the Soviet Union and from the Communist Party. Because Ukraine has been using this system for over sixty years, it is entrenched. But today, it is a system that is also beleaguered, criticized and discredited. There are good reasons for this and need no further explanation. The important thing is this: I came away from my experience hopeful that the owners of the system know that the system is in trouble, are working to change it and are serious about reform.

#### Attitudes among Ukrainian prosecutors

For whatever the reason, we encountered a real responsiveness among the prosecutors. There was a genuine eagerness to help us perform our assignment. More importantly, we also discovered an openness to change that was unexpected. With few exceptions, the officials in the Office of the Procurator General appeared to be open to the idea of improvement. They welcomed ideas about how they might do things differently, and they wanted to know how we

[REDACTED]



did it in the United States. I would reinforce this desire to do real justice by introducing Ukraine prosecutors to the lecture delivered by the American jurist, Robert H. Jackson, who, when he was Attorney General in 1940, gave an historic speech to federal prosecutors from all over the United States. ("Your positions are of such independence and importance that while you are being diligent, strict and vigorous in law enforcement, you can also afford to be just. Although the government technically may lose its case, it has really won if justice has been done.") This speech is required reading for American prosecutors.

Too frequently, when asked to explain a decision or a ruling, Ukraine prosecutors proffered -- and were satisfied with -- an explanation that involved technical compliance with a rule or a regulation, citing to a specific statute to justify a course of action. They did this to defend questionable decisions of the court as well as to explain prosecutorial decisions of their own. This is human nature. It will take some change for the prosecutorial culture of Ukraine to understand that a prosecutor should not manipulate the system to the detriment of the defendant simply because he/she can. It will take time and more experience in a truly adversarial system before Ukrainian prosecutors will learn that it is not enough just to win the case. They need to be able to look at the larger picture, and to care about the *appearance* of justice as well as the reality of justice.

The prosecutors of Ukraine are not the only prosecutors in the world who suffer from that failure. Those prosecutors who care more about due process than they do about winning are few and far between -- in Western courts as well as in Ukraine. But being able to see the larger picture is important. Being able to see the process for what it is and for how it will be seen from the outside is absolutely critical. Having that perspective is vital any effort to reform the criminal justice system in Ukraine.

Most of the officials with whom we worked wanted to understand and live up to Western standards of justice. They are, for example, learning to understand the importance of *good process* as an important objective in itself. That is a good and promising and important development, because "tone at the top" is absolutely essential for change to occur.

With greatest humility, I would make the following suggestions:

#### Better training for the prosecutors

Ukraine should consider opening an Academy of Advocacy that would -- perhaps in a three month course of instruction -- train lawyers to prepare and try cases in court. Any curriculum at such an academy would include lessons in basic procedure; how to manage discovery; how to handle exhibits and preserve evidence; how to identify the critical legal issues and prepare bench memos; how to prepare witnesses; how to make an opening statement and a closing argument; how to think about the credibility of the evidence, to identify an exhibit's weak points and to evaluate the legal issues associated with the exhibit.

Someone somewhere in Ukraine should end or at least truncate the practice of lawyers standing up and reading in court -- whether it is prior testimony or transcripts of interviews or hundred-



page indictments. The focus should instead be on presenting the direct testimony of live witnesses and allowing for them to be vigorously cross examined.

There should be a much greater appreciation about the rules of evidence generally but also the due process interest in having evidence that is in fact reliable and – under all standards of justice -- admissible. There should be a much greater understanding about the uses and abuses of expert testimony. Just because someone has written a report or has a credential should not allow that person to opine on the ultimate issue. The Academy should organize mock trials – with prosecutors and defense lawyers trying a fake case in front of a real judge. This kind of exercise takes place in law schools throughout the United States, and it should happen in Ukraine. .

#### Better training for the judges

Based on my experience with one judge, I would conclude that Ukraine judges are underpaid, undertrained, undervalued and over-worked. They deserve more money, more support, more training, more respect and more time. They also need more control over their courthouses – in terms of arranging for adequate space for counsel, for the public and for the defendants – and more control over their courtrooms – in terms of sanctioning members of the public who disrupt proceedings. Creating a school for judges – where new judges receive basic training – would be a necessary first step but not sufficient.

Everyone understands the importance of having an independent judiciary. Few are willing to do what is necessary to achieve that objective. Judges should not be immune from removal for incompetence or venality. They should be absolutely immune from being sanctioned because a result is unpopular.

#### Giving prosecutors more control over the investigation

The investigative arm of the Ukraine system of criminal justice seems to be an independent governmental agency of its own with its own practices and its own procedures that are totally independent of the prosecutorial function. In the West, investigators do have a great deal of freedom and independence as well, but they are always subject to supervision by the prosecutors. This provides for basic accountability.

This means that the prosecutors will preside over providing discovery to the defendant and his counsel; the prosecutors will prepare the file that goes to the court; the prosecutors make the decision as to who will be and who will not be a witness in the trial.

#### Strengthening the secretariat

The criminal justice system of Ukraine needs new and improved infrastructure to give greater legitimacy and accountability not only to the courts but also to the investigators and the prosecutors. It should be possible – routinely – to get verbatim transcripts of courtroom proceedings. Getting such transcripts should not be a matter of prosecutorial discretion. They should be available not only to the defendant but to the public as well. The same thing can be said for trial exhibits. That it is difficult to verify the way in which a judge is selected – and to

address allegations of bias and political influence – is just plain dumb. It raises questions unnecessarily about the fairness of the proceedings. Many of the inadequacies of the criminal justice system in Ukraine are more the product of bad systems and antiquated practices than they are of intentional and gross violations of human rights.

#### Using juries

Although the Constitution of Ukraine makes specific reference to the right to a jury trial, there is no jury-trial tradition in Ukraine. Sudden use of juries would be new and even alien to Ukraine citizens. But the availability of juries in some criminal cases would add enormous legitimacy to the criminal justice system and protects the judiciary from political reverberations. It would be a terrible mistake to introduce the practice of jury trials across the nation as if a bolt of lightning had struck. It would be smart to begin the experiment – on a very limited basis with a limited number of cases drawing on a very limited jury pool. It would be smart to teach judges and lawyers how to conduct themselves in front of a jury, how to address and instruct a jury – just to see what would happen. For Ukraine to give serious consideration to the idea, for Ukraine to engage in serious experimentation with the idea would do wonders for Ukraine's reputation.



Section 5 Inspection file,  
Registration # 3594 Paul  
J. Manafort  
May 27, 1987

Paul J. Manafort  
Registration #3594  
Section 5 Inspection  
July , 1986

## Memorandum



Subject	Date
Paul J. Manafort Registration No. 3594 Section 5 Inspection	[REDACTED] 149-46-62 Typed: 5/27/87

To [REDACTED]  
Registration Unit  
Internal Security Section  
Criminal Division

From [REDACTED]

Attention: [REDACTED]

*Noted  
5/27/87*  
J

BACKGROUND

The Initial registration statement was filed on June 4, 1984, reporting representation of the government of Saudi Arabia. Paul J. Manafort is a principal in the firm of Black, Manafort, & Stone, Inc. (BMS), which specializes in government relations, political consulting and advertising. Manafort registered in his own name to avoid having the firm register for Saudi Arabia. Employees of BMS who assisted Manafort in his work for the Saudis filed short-form registration statements under registration #3594.

Manafort terminated his short form on June 4, 1985, and refiled on March 11, 1986. A final supplemental statement was filed on January 6, 1987, reporting the termination of the representation of the Saudis on June 30, 1986.

INSPECTION

The inspection consisted of a review of the correspondence, memoranda and other documents, and the financial records maintained in connection with the representation of Saudi Arabia. The inspection covered the entire period of the representation, and disclosed what appear to be significant deficiencies in the registration, insofar as activities that have not been reported on the supplemental statement forms. For the most part, proposals and suggested activities have not been included in this report, but only activities which correspondence, memoranda or other notes state have occurred. The registrant will be required to detail these activities on amendment to registration statement forms or, in the appropriate cases, advise this office in writing that such activities did not occur. The notes attached to this report constitute a complete description of the registrant's records. Numerous references to proposals and suggested



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activities have not been included in the final report or the letter to the registrant, because of assurances by registrant's representatives [REDACTED], of BMS, and [REDACTED] registrant's attorney, that the proposals were never acted upon. The significant activities which were not reported on the supplemental statements follow:

1. June 29, 1984 memo Manafort and [REDACTED], of the Saudi/US Business Roundtable - Roundtable member companies should lobby their Senators and "coordinate their efforts through the ad hoc 'Jerusalem Contact Group' which we can put them in contact with."
2. July 13, 1984 memo to the "Jerusalem Contact Group" - Regarding the status of Jerusalem legislation, states that one member of Congress can object to a suspension of the rules, and has a handwritten note that BMS should find that member.
3. August 4, 1984 memo Manafort and [REDACTED] - Manafort and [REDACTED] personally lobbied the offices of [REDACTED]
4. September 25, 1984 memo [REDACTED] to Manafort - Contacts with [REDACTED] concerning amendments to the Jerusalem Bill. Efforts with a group to write a minority report on the Jerusalem Bill, and references to "the loop on the Hill" and "the political White House stuff."
5. March 6, 1985 letter [REDACTED] to Manafort and [REDACTED] - Handwritten notes refer to efforts to include "politically oriented" language in the report being prepared on the Saudi arms package. A handwritten note to [REDACTED] asked "Did we try to get this into report?" Reply - "Yes through the usual channel. [REDACTED]"
6. April 11, 1985 memo Manafort and [REDACTED] - Extensive activities during first quarter of 1985, saw registrant serve as a communications link between elements of the Administration and a communications filter between the Administration and Capitol Hill, contacts with agencies, Administration officials, and members and staff of Congress.
7. March 29, 1985 letter [REDACTED] - enclosing two articles to be passed on to [REDACTED].
8. April 23, 1985 memo Manafort to [REDACTED] - "... we are trying to persuade the White House to emphasize to the NSC the need to force the study to a conclusion. ... we have presented the anxieties which we have picked up in our conversations on Capitol Hill."
9. June 14, 1985 memo Manafort and [REDACTED] - Extensive second quarter activities described, including contacts with the Administration and Congress, as well as activities on behalf of Jordan and their lobbying counsel.



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10. September 3, 1985 memo Manafort and [REDACTED] - Third quarter activity report stated registrant served as communication link between the Administration and Congress, balanced AIPAC's efforts with key Senators, delayed efforts to revive Resolution 177 and clarified Saudi role in financing Jordanian arms package.
11. Undated document [REDACTED] to Paul - "Latest State Department - [REDACTED] poop on Jerusalem"-Refers to White House, Hill and Derwinski, followed by notation "BACK CHANNEL".
12. Undated document [REDACTED] - "Fred attended meeting held by NAAA on Saudi Arms Sales. As a result the following is suggested as content for a telex to go out to Roundtable Members" (3 paragraphs follow, not copied.)
13. December 30, 1985 memo Manafort to [REDACTED] - Activities for the fourth quarter included communications with Congress and the Administration.
14. January 8, 1986 document - The writer (unidentified) had lunch with [REDACTED] and discussed Saudi Arabia, the Philippines and the Foreign Assistance Bill.
15. April 25 and April 30, 1986 memos Manafort to [REDACTED] - Initiated grass roots campaign among home state supporters of certain Senators in connection with the Saudi arms proposal, and follow up on calls that haven't been made.
16. April 25 and April 30, 1986 memos Manafort to [REDACTED] and April 25, 1986 memo Manafort to the Intercontinental Hotel - Refer to "talking points" which the registrant "provided". The Intercontinental memo had an attachment "Talking Papers for Telephone calls on Pending Saudi Munitions Sale."
17. April 30, 1986 memo Manafort to [REDACTED] - "I have had several conversations with [REDACTED] on the arms sale. Their column appears in todays [REDACTED] ... and we are circulating it in appropriate places."
18. Steno notebook, page 9 - A copy of the "Q&A" was left in [REDACTED] office, and additional information on oil output was requested.

The attached audit report is a part of this inspection report. A letter to the registrant, concerning amendments and other responses, is also attached.



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A second contract between the registrant and Saudi Arabia was ent [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

#### Conclusion

The books and records of the registrant as presented to the auditor did not contain any evidence of monies received in addition to monies receivable per contract, or monies received in violation of the contingency provision provided in Section 8(h), of the Act.

In addition, as indicated the provisions of the three contracts included expense reimbursement by Saudi Arabia to the registrant. Total expenses reimbursed to the registrant by the foreign principal during the terms of the three contracts amounted to [REDACTED]. If the reader wishes to see a detailing of the registrant's expenses refer to the receipts and disbursements portions of this report.

Notes to Financial Records

Appearing in this section of the inspection report is a comparison between the receipts and disbursements reported by the registrant with the amounts actually received and incurred. The differences between the two are addressed in the recommendation section of the report, which follows.

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	0
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	0
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]  
\$200,000.00, which was not received and [REDACTED]  
[REDACTED]  
[REDACTED]

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Total disbursement reported by the registrant during the period  
of [REDACTED]

[REDACTED]

[REDACTED]

Amendments will not be requested from the registrant for the discrepancies in reported to actual disbursements. However, the registrant should be advised to give closer attention to proper period reporting in order to avoid future discrepancies.

**FBI 302**

**REDACTED**



**FBI 302**

**REDACTED**