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BY ECF

October 11, 2021

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, New York, NY 10007

Re: *United States v. Lev Parnas and Andrey Kukushkin*, S3 19 Cr. 725 (JPO)

Dear Judge Oetken:

The Government respectfully submits this letter in response to the defendants' three recent filings. (Dkts. 233, 234, 235). For the reasons set forth below, the defendants' various requests are without merit and should be denied.

I. The Summary Charts Provide an Efficient, Helpful, and Approved Manner to Present Evidence to the Jury.

Kukushkin, joined by Parnas, has moved to exclude Government summary charts creating a timeline of events relevant to the Government's case and probative of the charged conduct. (*See* Ex. A 1402).¹ These charts present voluminous email, text message, phone record, and other evidence in an integrated and chronological manner that the Government believes will aid juror comprehension and allow for an efficient presentation of evidence. For example, page 3 combines threads from four different WhatsApp chats and an entry from toll records on July 19, 2018 in chronological order so that jurors can readily observe the chronological relationship between this disparate evidence. There is no requirement for jurors to themselves locate these data points from the totality of the admitted evidence, pull out the relevant pieces, then line them up in chronological order so that they can understand such a sequence of events. Rather, that kind of laborious, time consuming task is exactly why Federal Rule of Evidence 1006, allowing the admission of summary charts, exists.

For this reason, the Second Circuit has "regularly affirmed" the use of summary charts "to draw the jurors' attention to particular evidence culled from a voluminous set of records." *United States v. Yousef*, 327 F.3d 56, 158 (2d Cir. 2003). Most recently, the Circuit affirmed the use of timeline charts similar to those at issue here in *United States v. Ho*, 984 F.3d 191 (2d Cir. 2020). There, as here, the defendant complained that summary charts organizing various types of evidence into timelines were "created for the purpose of generating a narrative supporting the prosecution's theory of the case." *Id.*

¹ To the extent Parnas means to imply that the disclosure of this exhibit was untimely (*see* Dkt. 234 at 1), he is wrong. The Government informed the defendants on September 3, 2021 that it would not be able to produce its timeline summary charts until after the Court ruled on motions *in limine*, because the content of the charts depended on those rulings. No defendant objected or requested earlier disclosure. On October 7, 2021, the Government disclosed a draft of these charts as 18 U.S.C. § 3500 material for the summary witness. And because the charts merely excerpt other exhibits that were disclosed four weeks before trial (and which are based on Rule 16 material disclosed long before then), no defendant can claim surprise.

at 209. The Circuit disagreed, citing a long line of precedent holding that such charts are useful to the jury and permitted by Rule 1006. *Id.* at 209-10.² Indeed, the use of such charts is so plainly proper that that it does not always rise to the level of written briefing. *See, e.g., United States v. Skelos*, No. 15 Cr. 317, Tr. 2252-57, 2262 (S.D.N.Y. 2015) (rejecting defense argument that timeline charts were “argument presented through an FBI agent” and “in effect summation,” and finding that “it is precisely the type of information that has been allowed to be used in charts”). Indeed, the charts in this case have been modeled on the same charts previously found admissible by the Circuit and other courts in this District. *Compare* Ex. A (GX 1402) *with* Ex. B (one of two *Ho* timelines), Ex. C (*Skelos* timelines), and Ex. D (two of several summary charts admitted in *United States v. Calk*, 19 Cr. 366 (LGS), at Tr. 2-5 (S.D.N.Y. June 22, 2021)).

Kukushkin’s claim that these charts improperly summarize the Government’s case (Dkt. 233 at 7-8) thus reprises exactly the sort of argument courts routinely reject. Moreover, his contention that the charts improperly “link” disparate evidence to suggest ominous connections is incorrect. To choose Kukushkin’s sole example, the first page of the charts does not imply any nefarious link between Kukushkin and Muraviev exchanging an article about legalizing marijuana in April 2018, and the other entries occurring in May 2018. The significance of the article is simply that it shows Kukushkin and Muraviev were interested in legalized cannabis and the politics surrounding it in the period right before the charged conduct began—exactly as Kukushkin describes it. (*See id.*). If there are further inferences to be drawn from that fact, neither the chart nor the testifying agent will draw them. That is a matter solely for argument, not direct or cross-examination. Nor is there anything improper about using ellipses in the summary chart to indicate where the original exhibit has been excerpted: if the chart did not excerpt exhibits, it would not be a summary, but simply a compilation as voluminous as the exhibits it contained.

By contrast, the cases upon which Kukushkin relies concerned summary charts that were prejudicial because they contained errors or unsupported assertions. (*See id.* at 7 (citing *United States v. Conlin*, 551 F.2d 538 (2d Cir. 1977) and *United States v. Citron*, 783 F.2d 307 (2d Cir. 1986)). In *Citron*, a tax case, the chart displayed a calculation of a disputed figure even though its basis was not apparent from the chart, and which the court found was based on “playing with numbers and doubletalk and triple talk, which no one understands.” 783 F.2d at 316. In *Conlin*, also a tax case, the chart contained a conclusion made by the testifying agent about another sum, but the chart did not indicate it was a conclusion—instead describing the number as simply “Amount Per Evidence”—which was particularly problematic given that the conclusion differed from the figures upon which it was based. 551 F.2d at 538. That is what is meant by saying a chart fails to “fairly represent competent evidence.” *Id.* Because the charts in this case advance no conclusions at all, nor will such testimony be elicited from the testifying agent, and neither defendant has identified any inaccuracy in their reflection of the underlying exhibits, they are admissible.

II. The Defendants’ Objections to the Mens Rea Evidence Are Meritless.

The Government offers the following three points in reply to the defendants’ last-minute attempts to exclude evidence that they knew their conduct was illegal (Dkts 233 at 2-6, 234 at 1-3), while basing their defense on ignorance of the law:

² In affirming the charts’ admission, the Circuit noted the importance of the usual limiting instruction “that the charts themselves did not constitute independent evidence and that it was the jury’s duty to first determine that they accurately reflected the evidence on which they were based.” *Ho*, 984 F.3d at 210. The Government consents to the same instruction here.

First, both defendants erroneously claim that evidence directly proving one defendant's state of mind cannot be offered against the other. (Dkts. 233 at 2-3, 234 at 2-3). Neither cites a case for this proposition, perhaps because, as the Second Circuit recently affirmed, evidence of a co-conspirator's state of mind is properly admitted against his co-defendant for many reasons. *See United States v. Mostafa*, 753 F. App'x 22, 36-37 (2d Cir. 2018) (collecting cases). Obviously, evidence that one defendant exchanged an article discussing the criminal nature of straw and foreign donations does more to prove his mens rea than his co-defendant's. But it is probative against both to show, among other things, that when Parnas and Kukushkin pursued a joint course of action that resulted in secretly introducing foreign donations into U.S. elections, they did so with a shared unlawful purpose. *See id.*

Second, the defendants have failed to identify any cognizable source of unfair prejudice. They primarily fear that the jury might accept the Government's straightforward interpretation of the evidence—such as that exchanging media coverage discussing the illegality of certain acts alerted the defendants to illegality of such acts—rather than the defendants' exculpatory explanations. That is not grounds for exclusion. *See, e.g., United States v. Coppola*, 671 F.3d 220, 246 (2d Cir. 2012) (argument that document did not bear on defendant's mens rea absent sufficient evidence he was aware of document went to weight, not admissibility). Where the defendants do resort to case law, the precedents only further support admission. For example, in *United States v. Royer* (cited by Kukushkin, Dkt. 233 at 5), the Circuit *affirmed* the allowance of testimony about the 9/11 attacks to rebut a defense, after carefully weighing its probative value and issuing an appropriate instruction. 549 F.3d 886, 902-03 (2d Cir. 2008). That is exactly the approach the Government urges here. (*See* Dkt. 231, at 5).³ And to the extent the defendants fear prejudice from extraneous material, unrelated to the purpose for which these exhibits are offered, the Government has repeatedly offered to make whatever redactions are appropriate. *See generally United States v. Davis*, 624 F.3d 508, 512 (2d Cir. 2010) (use of redaction appropriate to remove risk of unfair prejudice).

Third, the defendants have done little to detract from the probative value of these exhibits. They cannot reasonably dispute the basic purposes for which the disputed exhibits are offered, and so instead target strawmen. For example, Kukushkin notes that the FEC Complaint Article says only that GEP "might" have served as a conduit for campaign contributions from others, and claims it does not state that such conduct "is prohibited" (Dkt. 233 at 4), whereas Parnas depicts the same article as "journalistic sensationalism" (Dkt. 234 at 2). Both defendants have thus described the same article in opposite ways, in equally misleading attempts to exclude its considerable probative force. In fact, the relevant portion of the article describes a "Federal Election Commission complaint alleging that GEP might be an illegal campaign-finance conduit created to mask the actual sources of its political contributions." (GX 30-A-1 at 3). That is hardly sensationalist, but it does plainly inform any reader that campaign-finance conduits and efforts to mask the actual sources of political contributions are "illegal." (*Id.*). The defendants thus cannot reasonably ask the Court to find that a risk of unfair prejudice from this article—or the other disputed evidence (*see* Dkt. 231 at 1-6)—"substantially outweigh[s]" its plain probative value. Fed. R. Evid. 403.

³ The other case Kukushkin cites on this issue has nothing to do with admitting evidence. (*See* Dkt. 233 at 5 (citing *United States v. Elfgeeh*, 515 F.3d 100, 130 (2d Cir. 2008))). In *Elfgeeh*, media coverage during and about the trial linked the defendant to Al-Qaeda, citing evidence that would not be admitted at trial, including a defendant's prior guilty plea. 515 F.3d at 130. The concern that a juror might have read such articles outside court in no way suggests the evidence offered in this case is improper.

III. Kukushkin's Jury Selection Requests Should Be Denied.

Kukushkin asks the Court to defer the exercise of for cause and peremptory challenges until the second day of trial so that defense counsel, presumably with the assistance of the several jury consultants he has retained,⁴ can conduct background research on the jurors. (Dkt. 235 at 1-2). Although it is permissible for parties to conduct research into potential jurors, there is no legal or constitutional requirement that parties be given an extra day to do so. “[T]he purpose of the *voir dire* is to ascertain disqualifications, not to afford individual analysis in depth to permit a party to choose a jury that fits into some mold that he believes appropriate for his case.” *United States v. Barnes*, 604 F.2d 121, 138 (2d Cir. 1979) (citations omitted). “[S]o long as the court conducts a careful *voir dire* designed to uncover any bias as to the issues or the defendants,” the defendants’ rights are not infringed. *United States v. Aulicino*, 44 F.3d 1102, 1116 (2d Cir. 1995); *see also United States v. Vario*, 943 F.2d 236, 241-42 (2d Cir. 1991) (“the district court conducted a searching *voir dire* which sufficiently enabled [the defendant] to exercise his challenges meaningfully and to obtain a fair and impartial jury”). Indeed, it is not unusual for courts to empanel anonymous juries, which deprive the parties of identity information that could be used to do research, and still conduct a fair jury selection process. *See, e.g., United States v. Prado*, No. 10 Cr. 74 (JFB), 2011 WL 3472509, at *10 (E.D.N.Y. Aug. 5, 2011) (Bianco, J.) (collecting cases and rejecting the objection that an anonymous jury would prevent the defendant from “meaningfully exercising his peremptory challenges” because he would not be able to use “the internet and its many tools of investigation and research”). And notably absent from defense counsel’s letter is any authority requiring that a defendant be given an opportunity to research potential jurors.

The Court has already indicated at the final pretrial conference that it would ensure a fair jury is selected, with input from the parties on the questions asked of prospective jurors. The defendants and their counsel will have the opportunity to consider prospective jurors’ responses, suggest additional questions to the Court, and conduct research up to the point at which they must exercise their challenges. But to delay the completion of jury selection to Wednesday so that defense counsel and their hired consultants may research the jurors would significantly inconvenience many jurors who would need to report to court for a second day, only to be struck. It would also unnecessarily delay the trial, extend the length of jury service, potentially force out-of-state witnesses to change travel plans, and unnecessarily occupy a courtroom for an additional period of time. For all of these reasons, Kukushkin’s request should be denied.

Kukushkin also now objects to the parties simultaneously exercising peremptory challenges, even though the Court announced the plan almost a week ago without objection from the defendants. The Court has “broad discretion to determine the way preemptory challenges will be exercised.” *United States v. Thompson*, 76 F.3d 443, 451 (2d Cir. 1996) (internal quotation marks and citation omitted). The “blind strike” or “simultaneous” method of exercising peremptory challenges is constitutional and consistent with Rule 24(b), and therefore it is within the Court’s discretion to use that method. *See United States v. Bermudez*, 529 F.3d 158, 164-65 (2d Cir. 2008) (citing *Pointer v. United States*, 151 U.S. 396 (1894)).

The Court should also deny Kukushkin’s request for additional jury strikes. Although courts have discretion to grant such requests, they are regularly denied. *See, e.g., United States v. Blaszcak*, 2018 WL 1787617, *1 (S.D.N.Y. Mar. 19, 2018) (denying request for one additional strike per defendant in three defendant case). Here, Kukushkin has identified no reason that he requires additional strikes: his defense may be “not necessarily aligned” with Parnas’s (Dkt. 235 at 3), but he has identified no set

⁴ Kukushkin’s list of people and entities discloses the names of three jury consultants and a jury consulting firm.

of potential jurors who would be more inclined to favor one defendant over the other. *See Blaszcak*, 2018 WL 1787617, at *1 (describing claimed need for additional strikes in light of defendants' different roles in offense as "rather speculative"). And that multiple defense lawyers may not agree on how to exercise their peremptory challenges does not mandate an additional challenge for each defendant. *See United States v. Magana*, 118 F.3d 1173, 1206 (7th Cir. 1997); *United States v. McClendon*, 782 F.2d 785, 788 (9th Cir. 1986). Providing the defense with additional challenges is unnecessary, provides a significant advantage to the defense in formulating the jury, and will needlessly prolong the jury selection process.⁵

Respectfully submitted,

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⁵ Should the Court grant the defendant's request for additional strikes, the Government respectfully requests that the Court condition such a ruling on the defendants' consent to a proportional number of additional Government strikes. *See United States v. Bruno*, 873 F.2d 555, 560 (2d Cir. 1989); 2 Fed. Prac. & Proc. Crim. § 386 (4th ed.) ("[I]t is not uncommon for the court to condition the grant of a defendant's request for additional challenges on defendant's consent to a proportionate increase being accorded to the government"). Although the Government believes an impartial jury can be empaneled with the usual number of strikes, to the extent the defendants have genuine concerns about impartiality—rather than a desire for strategic advantage—such consent should be readily given.

April and May 2018			
Date	From	To	Detail
4/21	Andrey Kukushkin	Andrey Muraviev Alex Mikhalev Sergei Hrapunov	Link to Washington Post article: “Schumer introduces measure to decriminalize marijuana” (GX 4)
5/11 1:20 p.m.	Joseph Ahearn	Lev Parnas	Links to ABC News article “Special Counsel probing donations with foreign connection to Trump inauguration” and Marijuana Moment article “Details on Bipartisan Marijuana Bill to be Filed Soon” (GX 8)
5/11 1:22 p.m.	Parnas	Ahearn	“Interesting” (GX 8)
5/27	Kukushkin	Igor Fruman	“Igor, We are flying out in a couple of hours. Thank you for your courtesy and I hope we will meet soon 🤝 ” (GX 14)

June 2018			
Date	From	To	Detail
6/2 12:03 p.m.	Kukushkin	Fruman	“We will resolve it with you and Andrey will support \$:)” (GX 14)
6/2 12:05 p.m	Fruman	Kukushkin	“Great” (GX 14)
6/5	Kukushkin	Muraviev	0:37 Phone call (GX 601)
6/14 3:21 p.m.	Kukushkin	Fruman	“Everything is moving . . . How are you?” (GX 14)
6/14 3:22 p.m.	Fruman	Kukushkin	“Great!!! We are working Washington!!!” (GX 14)
6/20 11:44-45 a.m.	Fruman	Kukushkin	Pictures of Parnas, Fruman, and political figures including then-President Donald Trump (GX 14)
6/20 11:49 a.m.	Kukushkin	Fruman	“Aside from you, Lev and Donald, I do not know anyone!” (GX 14)
6/20 12:07 p.m.	Fruman	Kukushkin	“In general, we do not need anyone else anymore!!!” (GX 14)
6/20 12:08 p.m.	Kukushkin	Fruman	“In general, we need Andrey because ‘your guys’ are raking it in just for an appointment” (GX 14)

July 9-19, 2018			
Date	From	To	Detail
7/9 3:51 a.m.	Kukushkin	Parnas	"David's phone number, please!" (GX 89)
7/9 4:24 a.m.	Parnas	Kukushkin	Email address and phone number for "Dave Correia" (GX 89)
7/19 5:50 p.m.	Parnas	Kukushkin	"Call me important" (GX 24)
7/19 6:16 p.m.	Kukushkin	Parnas	1:06 phone call (GX 601)
7/19 6:53 p.m.	Kukushkin	Fruman	"An understanding of the joint activities has been reached. I discussed it with Andrey, but we need to show at least one completed action . . . Financial resource: Andryukha . . ." (GX 25)
7/19 6:57 p.m.	Kukushkin	Muraviev	Picture of Fruman, Donald Trump Jr., and Florida governor candidate Ronald DeSantis. "An understanding of the joint activities has been reached. . ." (GX 26)
7/19 6:59 p.m.	Fruman	Parnas	Same "An understanding of the joint activities has been reached. . ." message (GX 27)
7/19 7:59 p.m.	Kukushkin	Parnas	Same "An understanding of the joint activities has been reached. . ." message (GX 28)
7/19 9:30 p.m.	Kukushkin	Fruman	"Igor, we are going in circles with Leva. :) Yet I clearly laid everything out. . .We do not pay for anyone's political ambitions or lobbyists at all. We get a <i>License</i> , they get a bonus . . . All the money invested in the process should be repaid to Andryukha . . ." (GX 25)
7/19 9:37 p.m.	Kukushkin	Parnas	"Leva, we are going in circles... Yet I clearly laid everything out. . .We do not pay for anyone's political ambitions or lobbyists at all. We get a <i>License</i> , they get a bonus . . . All the money invested in the process must first be repaid to Andryukha . . ." (GX 24)

July 25 to August 31, 2018			
Date	From	To	Detail
7/25	Parnas	Correia	Sends a Federal Election Commission (FEC) complaint alleging Parnas, Fruman, and Global Energy Producers (GEP) violated the Federal Election Campaign Act (FECA) by making campaign contributions in the name of another person (GX 90)
8/4	Kukushkin	Muraviev	Link to an article describing Parnas and Fruman as two of GEP's "executives" and describing FEC complaint "alleging that GEP might be an illegal campaign-finance conduit" (GX 30)
8/6	Fruman	Muraviev	10:30 phone call (GX 1295)
8/31	Fruman	Parnas	Link to article describing guilty plea for "causing foreign money" to be paid to presidential inaugural committee, using a "straw" buyer of inaugural tickets to avoid Inauguration Committee's refusal to "accept money from foreign nationals because of Federal Election Commission rules." (GX 32)

September 5, 2018			
Date	From	To	Detail
9/5 1:59 a.m.	Muraviev	Kukushkin	“Bro would you fly back with me on the 10th” (GX 34)
9/5 2:06 a.m.	Kukushkin	Muraviev	“Sure!:) Where are we flying to?” (GX 34)
9/5 2:31 a.m.	Muraviev	Kukushkin	“To Ibiza for 2 days then Moscow” (GX 34)
9/5 3:32 p.m.	David Correia	Parnas	“Ok, here is the deal on Vegas: Igor spoke with Andre earlier and told him we were definitely coming there . . . I just spoke with Andre, he is expecting the same. . . We will coordinate with Roy today on the attorney general meeting . . .” (GX 53)
9/5 4:02 p.m.	Ahearn	Parnas Correia	Invitation to 9/7 fundraiser in Las Vegas for Adam Laxalt, with special guest Mike Pence (GX 35)
9/5 4:11 p.m.	Kukushkin	Parnas	2:41 FaceTime call (GX 1296)
9/5 5:46 p.m.	Ahearn	Parnas Correia	“Let me know if you guys want to go. I can make sure laxalt speaks highly” (GX 35)
9/5 5:47-5:52 p.m.	Parnas	Ahearn Correia	“Yes for sure 👍” “I’ll have Dave call you with info” (GX 35)

September 6-10 2018			
Date	From	To	Detail
9/6	Kukushkin	Maisie Rodolico Parnas Fruman Correia Deanna Van Rensburg	Confirms attendance at “Friday’s Laxalt for Nevada event with Vice President Pence.” (GX 133)
9/7	n/a		Laxalt for Nevada fundraiser with Vice President Pence (GX 35-A-1; GX 133)
9/8 1:48 p.m.	Muraviev	Kukushkin	3:10 phone call (GX 601)
9/8 9:58-10:01 p.m.	Parnas	Kukushkin Muraviev Fruman Felix Vulis	“Bratva” group chat created. “Feliks, Andrey, Igor, Kukhnya. Brothers, I just want to introduce you to each other. . .” (GX 38)
9/9	Fruman	Parnas Kukushkin Muraviev Vulis	Address, bank account, and routing number for “F.D. Import & Export Corp., USA, 520 White Plains Rd., Suite 500, Tarrytown, NY 10591” (GX 38)
9/10 1:29-1:32 a.m.	Fruman	Kukushkin	“. . . Let’s do what is really important: 500 to that bank information tomorrow . . . We are opening up a company within a week and another 500 for Nevada. . . Every invested dollar yields 100 thousand!!!!”; same address and bank account information, and routing number, for F.D. Import & Export Corp. (GX 33)
9/10 1:33 a.m.	Fruman	Parnas	“I sent this letter to Kunya:” followed by same “Let’s do what is really important” message. (GX 39)

September 11-12 2018			
Date	From	To	Detail
9/11	Kukushkin	Slava Krasov	"I had a good meeting with Attorney General of Nevada and he is willing to help in Vegas. No assurances, just donations"; picture of Kukushkin and Adam Laxalt (GX 40)
9/12 1:15 p.m.	Correia	Parnas	"Please see draft" email attaching "Cannabis Schedule and budget" including "Campaign Contributions" and "Funding Schedule" (GX 135)
9/12 1:20 p.m.	Correia	Parnas	Attaches "Cannabis Schedule and budget"; "Emailed to u also...please read and call me" (GX 53)
9/12 1:23 p.m.	Parnas	Correia	"Perfect send it to Igor" (GX 53)
9/12 1:23 p.m.	Correia	Parnas Fruman	Attaches "Cannabis Schedule and budget" (GX 42)
9/12 1:24 p.m.	Parnas	Fruman Correia	"This is good send it to them Igor 👍" (GX 42)
9/12 1:34 p.m.	Fruman	Parnas Correia	"Perfect" "I gonna send them right now" (GX 42)
9/12 1:35 p.m.	Fruman	Kukushkin	Attaches "Cannabis Schedule and budget" (GX 33)

September 13, 2018			
Date	From	To	Detail
9/13 2:21-2:33 p.m.	Kukushkin	Muraviev Mikhalev	Attaches “Cannabis Schedule and budget”; “Tomorrow it’s necessary to set the priorities and to confirm the transfer to the guys. Do you already know from where can \$500,000 be given to them, Sasha? . . .” (GX 45)
9/13 5:34-5:37 p.m	Fruman	Kukushkin	“. . . It’s important to transfer 500 . . . The man whom you met with us in Nevada called, said that he was personally waiting for us with his deputy, who would take over from him when he becomes governor, to discuss our issue! . . . one can’t say there is no money . . .” “the transfer must be done tomorrow morning!!!!” (GX 43)
9/13 5:38 p.m	Fruman	Parnas	“It’s important to transfer 500 . . .” and “the transfer must be done tomorrow morning” messages, followed by “Wrote this text to Kunya.” (GX 44)
9/13 5:41 p.m.	Parnas	Fruman	“👍👍👍 super” (GX 44)
9/13 5:41 p.m.	Fruman	Parnas	“I’ll send the second Andrey a copy!!!” (GX 44)
9/13 5:42 p.m.	Parnas	Fruman	“Yes” (GX 44)

September 14, 2018			
Date	From	To	Detail
9/14 9:49 a.m.	Fruman	Kukushkin	“What’s new?” (GX 43)
9/14 9:49 a.m.	Kukushkin	Fruman	“We are waiting for Andrey. I am already at the office with Sasha.” (GX 43)
9/14 10:49 a.m.	Kukushkin	Muraviev Mikhalev	Address and bank account information, and routing number, for F.D. Import & Export Corp. (GX 45)
9/14 10:51 a.m.	Fruman	Kukushkin	Phone number for Steven Fruman and sfruman@gmail email address (GX 33)
9/14 10:54 a.m.	Kukushkin	Fruman	Phone number and email for Alexander Mikhalev (GX 43)
9/14 10:58 a.m.	Fruman	Steven Fruman	Phone number and email for Alexander Mikhalev (GX 31)
9/14 2:11-12 p.m	Fruman	Kukushkin	Attaches voicemail from Wes Duncan. “This is a message from our friend.” (GX 43)
9/14 2:17 p.m.	Fruman	Steven Fruman	“He says that he will send it on Monday for sure. Transferred everything to Switzerland today.” (GX 31)

September 16 to 18, 2018			
Date	From	To	Detail
9/16	Kukushkin	Fruman	Video of assault on street artist “Give me my money back, you think this is a joke?” (GX 43)
9/17	Fruman	Kukushkin	Signed \$500,000 loan agreement (GX 43)
9/18 7:25 a.m.	Fruman	Parnas Correia	Chase account alert regarding “incoming wire transfer of (USD) \$500,000.00” (GX42)
9/18 9:54 a.m.	Parnas	Fruman Correia	“👉👉👉🙏🙏🙏 see you later going to be a great day” (GX 42)
9/21 3:21 a.m.	Muraviev	Parnas Kukushkin Fruman Vulis	Picture of Time cover: ‘How Putins Oligarch’s Got Inside the Trump Team” (GX 38)
9/21 7:45 a.m.	Fruman	Parnas Kukushkin Muraviev Vulis	“👉👉” (GX 38)
9/21 12:03 p.m.	Parnas	Fruman Kukushkin Muraviev Vulis	“👉👍👉👍” (GX 38)

September 30 to October 1, 2018			
Date	From	To	Detail
9/30 1:26 p.m.	Kukushkin	Correia	". . . Spoke to Lev and h suggested Deanne could coordinate my tickets and Hotel in Miami, which would be very convenient." (GX 52)
9/30 4:29 p.m	Correia	Parnas	"Spoke to Andrey . . . He mentionded he wanted Deanna to set up his travel . . . so maybe use Amex.....Then....Andrey M can wire the \$500k....All cool with you?" (GX 53)
9/30 4:35 p.m	Parnas	Correia	"Have him call Igor don't use any of our cards" (GX 53)
9/30 4:36 p.m.	Correia	Kukushkin	". . . Just connect with Igor to confirm travel expenses ao he can confirm with Deanna as to which credit card to usezzz" (GX 52)
9/30 5:12 p.m.	Kukushkin	Correia	"The Global Energy which received funds for all the 'charity & support'. I am coming for particular business reasons which are associated with our actions." (GX 52)
9/30 7:19 p.m.	Correia	Kukushkin	". . . Our agreement was for \$1M for 'startup' moneys. The next \$500,000 is for the 'operational budget', which would include 'general' company expenses.....such as 'your' travel." (GX 52)
10/1 1:25 a.m.	Kukushkin	Correia	". . . please allocate 10% of the existing donation funds for our business necessities." (GX 52)
10/1 9:33 a.m	Correia	Parnas Fruman	"Andrey's response to my last text": 10/1 1:25 a.m. message, including "please allocate 10% of the existing donation funds . . ." (GX 54)
10/1 8:45 p.m.	Kukushkin	Correia	". . . If Igor can't authorize it instantly that why have I authorized the transfer of \$500k and all this charade?" (GX 52)

October 2, 2018			
Date	From	To	Detail
10/2 2:56-3:32 p.m.	Kukushkin	Fruman	"Igor, I will not be flying to the event . . . We will meet in Vegas. Greetings to Lev!" ". . .I have an emergency with my teeth . . ." "I will definitely fly in to Miami and we will meet with De Santis, but already after Nevada." (GX 58)
10/2 3:36 p.m.	Fruman	Kukushkin	"Yes. We need to open an account urgently and to deposit 500 there. We have to fork over a check for 250 to him at the event." (GX 58)
10/2 4:56 p.m	Kukushkin	Fruman	". . . if he sends out a Docusign document, then this is one minute." (GX 58)
10/2 4:58 p.m.	Fruman	Correia Parnas	"Hi don't know how to use DocuSign. Pls. Call him and provide step by step" (GX 54)
10/2 5:56 p.m.	Correia	Fruman Parnas	"He has everything" (GX 54)
10/2 7:17 p.m.	Correia	Fruman Parnas	"I have Andrey's signed document and should be fine to open up account tomorrow." (GX 54)
10/2 7:21-7:23 p.m.	Parnas	Correia Fruman	"Finally" "Let's get account open tomorrow morning and let get the wire info out" (GX 54)


October 3, 2018			
Date	From	To	Detail
10/3 3:14 p.m.	Correia	Parnas Fruman	"Gentlemen, bank account is opened and Deanna just sent over a bank instruction page for the wire information. You should have in your emails and WhatsApp I believe." (GX 54)
10/3 3:34 p.m.	Fruman	Correia Parnas	"I ask andrey to send many to this account!?" (GX 54)
10/3 3:47 p.m.	Correia	Parnas Fruman	"Yes...great." (GX 54)
10/3 6:25-6:42 p.m.	Fruman	Kukushkin	Sends Strategic Investment Group, INC Corporate Wire Instructions. "The company is ready. The account is open. Waiting for 500" (GX 58)
10/3 6:45 p.m.	Kukushkin	Fruman	"Write to the group please. We have to show actual results for the first 500" (GX 58)
10/3 6:57 p.m.	Fruman	Kukushkin	"I am reminding about our agreements: 1000 before October 1 . . . The results exist already in Nevada, in Miami and New York will be shortly together with documents !!!" (GX 58)
10/3 9:02-9:05 p.m.	Fruman	Parnas Kukushkin Muraviev Vulis	Picture of Fruman with candidate for Florida Governor Ron DeSantis. "Today Florida become ours forever!!!! Congratulations!!!!!!!" (GX 59)

October 7 and 8, 2018			
Date	From	To	Detail
10/7 10:40 p.m.	Fruman	Parnas	"Call me. Need to talk." (GX 60)
10/7 10:55 p.m.	Fruman	Kukushkin	" Please don't forget to send 500 to NewCo!!! " " what we are waiting for, it is a past event with the governor . . . He is very grateful and waiting. October 13 is an event with the governor and AG Nevada . . ." " Everything is according to the program of preparation of penning up the licensing in the key states. . ." "After the 6 th , nobody will need anything here !!!!!!!!!!!!!!!!!!" (GX 58)
10/7 10:55 p.m.	Fruman	Parnas	Sends same 10/7 10:55 messages as sent to Kukushkin (GX 60)
10/8 8:26 p.m.	Correia	Parnas Fruman	"attached DRAFT" attaching "State Campaign Contributions" tables (GX 144)
10/8 8:28 p.m.	Correia	Parnas Fruman	"I just emailed both of you my first draft of this document . . . please discuss between the two of you . . . I will call Lev around 9pm to make the final changes" (GX 54)
10/8 11:31 p.m.	Correia	Parnas Fruman	"please see attached. If all good. Please forward on" attaching "Strategic Investment Group, Inc State Campaign Contributions" tables (GX 146)

October 9, 2018			
Date	From	To	Detail
10/9 2:11 p.m.	Fruman	Kukushkin	"SIG Contribution List" attaching "Strategic Investment Group, Inc State Campaign Contributions" tables (GX 58)
10/9 2:23 p.m.	Fruman	Kukushkin	"We will fuck up everything again!! Where is the money, Andrey?!" (GX 58)
10/9 2:31 p.m.	Kukushkin	Fruman	"I think we have not fucked up anything but proceeding in accordance with the plan. Did you send the new input to the group?" (GX 58)
10/9 2:39 p.m.	Fruman	Kukushkin Parnas Muraviev	"SIG Contribution List" attaching "Strategic Investment Group, Inc State Campaign Contributions" tables. (GX 61)
10/9 2:51 pm	Kukushkin	Parnas Fruman Muraviev	". . . Our contributions are kind of way too much. It would be good for us to see the results after the first \$500 in order to keep sowing more! When will Nevada, New York, Jersey, and Florida confirm the connections with results?" (GX 61)
10/9 3:09-3:10 p.m.	Fruman	Kukushkin Parnas Muraviev	"Andryukha, read the correspondence, bro!!!" "We have time until November 6!!! After that, it's over!!!!!" (GX 61)
10/9 5:31 p.m.	Fruman	Kukushkin	Screenshot of text messages to Muraviev: "I understand that 500,000 is a lot of money, but I don't understand why no one remembers what we agreed on?!" "Andryukha!!! Don't disappoint with the money, brother!!! Tranfer it tomorrow!!!!!!" "You can do a credit agreement just like for the last among in order not to tormer the banks!!!" (GX 58)

October 10-11, 2018			
Date	From	To	Detail
10/10 1:02-1:03 p.m	Kukushkin	Muraviev Mikhalev	“SIG Contribution List” attaching “Strategic Investment Group, Inc State Campaign Contributions” tables. “We need to quickly decide what our moves are going to be, friends.” (GX 62)
10/10 2:35 p.m.	Kukushkin	Fruman	“I spoke with Sanya. he is waiting for approval from Andrey regarding transfer. I confirmed the agreements and explained the situation once more” “How is Washington?” (GX 58)
10/10 2:36 p.m.	Fruman	Kukushkin	“Everything is great!! We are taking over the country!!!!” (GX 58)
10/10 7:35 p.m.	Parnas	Muraviev Kukushkin Fruman Vulis	Picture of Parnas with Jared Kushner and Ivanka Trump (GX 64)
10/10 9:27 pm	Kukushkin	Fruman	“I am waiting for confirmation from Andrey/Sasha . . .” (GX 58)
10/11 2:03 p.m.	Kukushkin	Fruman	“ The money from Sasha will be sent tomorrow. It's probably correct that it goes straight to our new company? ” (GX 58)
10/11 2:07 p.m.	Kukushkin	Parnas	“The money from Sasha will be sent tomorrow. It’s probably correct that it goes straight to our new company?” (GX 66)
10/11 2:30 p.m.	Fruman	Kukushkin	“I spoke with Andrey, it is better using the old scheme to avoid problems later” (GX 58)
10/11 11:28 p.m.	Mikhalev	Steven Fruman	“Hi Steven” “I need to send you the second tranche” “Should I use the same company as a borrower?” (GX 48)

October 13-19, 2018			
Date	From	To	Detail
10/13 4:39-4:40 p.m.	Parnas	Kukushkin Fruman Muraviev (Vulis GX 64 only)	Link to Fox Business story white-house-to-unveil-federal-cannabis-reform-very-soon-says-top-gop-lawmaker, “We had a good meeting 😊😊😊” “We will be kings if cannabis 🙏👍👉” (GX 61, 64)
10/17 8:25 a.m.	Mikhalev	Steven Fruman	“Hi Steven, did you get money?” (GX 48)
10/17 8:45 a.m.	Steven Fruman	Mikhalev	“. . .Yes received yesterday” (GX 48)
10/17 9:29 p.m	Kukushkin	Fruman	“And what do we have in Vegas?” (GX 68)
10/17 9:29-9:32 p.m.	Fruman	Kukushkin	“Meeting with the governor and prosecutor” “We are now trying to coordinate for Saturday. The President will be in Alco.” (GX 68)
10/19 5:37 p.m.	Parnas	Deanna Van Rensburg	“Please find out from kukooshkin if he received an email confirming his Vip entrance to the event tomorrow” (GX 72)
10/19 5:38 p.m.	Van Rensburg	Kukushkin	“Did you receive an email confirming your Vip entrance to the event tomorrow??” (GX 73)
10/19 5:52 p.m.	Kukushkin	Van Rensburg	Image: “Dear Andrey, Congratulations! You are registered as a VIP to attend President Trump rally in Elko, NV” (GX 73)

October 20, 2018			
Date	From	To	Detail
10/20 2:18 a.m.	Parnas	Kukushkin	0:43 phone call (GX 601)
10/20 12:15 p.m.	Parnas	Muraviev Kukushkin Fruman	Picture of Kukushkin, Wes Duncan, and police chief at outdoor event (GX 74)
10/20 12:21-33 p.m.	Kukushkin	Muraviev Parnas Fruman	Pictures of Kukushkin, Parnas, and Fruman at outdoor event (GX 74)
10/20 12:54 p.m.	Muraviev	Kukushkin Parnas Fruman	 (GX 74)
10/20 1:55 p.m.	Parnas	Kukushkin	Picture of Parnas and Kukushkin together at outdoor event (GX 66)
10/20 3:55-59 p.m.	Kukushkin	Muraviev Mikhalev	Pictures of Kukushkin, Parnas, and Fruman at outdoor event. Picture of Kukushkin, Wes Duncan, and police chief at outdoor event. “The new Attorney General is in the middle.” Video of Donald Trump speaking at outdoor event. (GX 75)
10/20 9:09 p.m.	Fruman	Parnas Kukushkin Muraviev	Picture of Parnas, Kukushkin, and Fruman together indoors (GX 61)

October 22 to 23, 2018			
Date	From	To	Detail
10/22 11:15 a.m.	Duncan	Parnas	Scheduled meeting with Wes Duncan and Duncan's law partner (GX 702)
10/22 2:05 p.m.	Kukushkin	Parnas	"I am coming to you in 15 minutes" (GX 91)
10/22 4:09 p.m.	Kukushkin	Muraviev Mikhalev	"I've met with an attorney referred by the Attorney General. . . Currently Las Vegas doesn't accept any more applications . . . with the help of our 'new friends,' we shall get a guaranteed response before mid-December!" (GX 77)
10/23 2:34 p.m.	Muraviev	Kukushkin	"Send a picture here" (GX 78)
10/23 2:35-36 p.m.	Kukushkin	Muraviev	Picture of Kukushkin, Wes Duncan, and police chief at outdoor event. "In teh middle is a right hand of Adam who runs for new Attorney General" (GX 78)
10/23 2:38 p.m.	Muraviev	Kukushkin	"Who is in the uniform" (GX 78)
10/23 2:38-39 p.m.	Kukushkin	Muraviev	"His local cop" "They control the whole State police, just in case :)" (GX 78)

October 24, 2018			
Date	From	To	Detail
10/24 5:55 p.m.	Kukushkin	Correia	"I am on line, Daniel Stewart is waiting for us to conference" (GX 79)
10/24 7:00 p.m.	Kukushkin	Parnas	"It doesn't look good from what I hear and Daniels comments . . ." "If we don't get prime locations within 2-6 months, we are out of the game for a long time" (GX 66)
10/24 10:51 p.m.	Kukushkin	Parnas Muraviev Fruman	"It doesn't look good from what I hear and Daniels comments . . ." "If we don't get prime locations within 2-6 months, we are out of the game for a long time" ". . . We are 2 months too late to the game unless we change the rules." (GX 81)
10/24 11:07 p.m.	Kukushkin	Parnas Muraviev Fruman	"We need Governor's approval and green light to implement this with December licenses awards and to include us in per plan . . ." (GX 81)
10/24 11:17 p.m.	Kukushkin	Parnas Muraviev Fruman	". . . now it's 🐯 Lev's turn! This is what we want: All the counties supporting Republicans have, at least, to ask the Governor (by the way of the requesting licenses quota), and he will approve it for our particular group . . ." (GX 81)

October 25 to 29, 2018			
Date	From	To	Detail
10/25 1:29 a.m.	Kukushkin	Parnas Muraviev Fruman	“Together with lawyers, we have to write something beautiful and, together with the Attorney General, help the current Governor establish . . .” (GX 81)
10/25 5:55 p.m.	Kukushkin	Correia	“They know we need to change the rules from the top but only after the elections. This is our only chance” (GX 79)
10/29 2:48-2:50 p.m	Fruman	Kukushkin	“I spoke with Andrey. We have to resolve what we are adding regarding our program . . . We think 2 million. If there such a possibility it would be really correct and timely.” List of states including Florida and Nevada. (GX 82)
10/29 2:52 p.m.	Kukushkin	Fruman	“Concentrate on the states where we have already poured the money and let’s stick to \$1M budget and to meet with all the key people.” (GX 82)
10/29 3:09 p.m.	Van Rensburg	Kukushkin	“Hi Andrey, Can you tell me when Adam Laxalt’s team can expect the 2 checks totaling \$12,500 . . .” (GX 73)
10/29 3:12 p.m.	Kukushkin	Van Rensburg	“Hi Deanne, the money was transferred ~ \$1M to Lev & Igor’s company a long time ago to cover all the contributions as planned.” (GX 73)
10/29 3:17-23 p.m	Fruman	Kukushkin	“Andrey, what kind of mushroom did you eat today!?” “What are these discussions with our secretary???????” (GX 82)
10/29 3:33 p.m.	Kukushkin	Fruman	“Did you all lose your mind there?” Screen shot of the 3:09 and 3:12 p.m. texts between Kukushkin and Van Rensburg. (GX 82, GX 82-A-17)
10/29 3:37-38 p.m	Fruman	Kukushkin	“She is my secretary and travel and event coordinations Meneger !!!” “Have nothing to do with many situations!!!!!!!!!!” (GX 82)

October 30 to November 1, 2018			
Date	From	To	Detail
10/30 11:13 a.m.	Parnas	Kukushkin Muraviev Fruman	"I just got off the phone with Igor and he's explained to me the situation . . . Please let me know when we can schedule meeting to discuss. . ." (GX 83)
10/30 11:32 a.m.	Muraviev	Parnas Kukushkin Fruman	"In Las Vegas we agreed on the principles of our cooperation . . . It was decided that I will provide \$1 million for our future enterprise . . . As of today, I have fulfilled all my obligations completely!" (GX 83)
10/30 11:43 a.m.	Parnas	Kukushkin Muraviev Fruman	". . . I don't want to discuss everything over text . . . We did very thing we are supposed to do with part 1 but we never started part 2 – office and personal to do the work . . . If you want I would be happy to have a call with you and discuss . . ." (GX 83)
10/30 3:05 p.m.	Kukushkin	Parnas Muraviev Fruman	"I believe we all have a clarity from day 1 and precise course of action. We have performed everything that we have agreed upon on our end. . . Money transferred by Andrey M to Global Energy was to support the very specific people & states (per Igor's table) in order to obtain green light for licensing . . ." (GX 83)
10/31 11:52 p.m.	Kukushkin	Muraviev	"Fruman is in touch, and Leva's is hiding somewhere. . . Well, they understand everything, they read and understood that we no longer sow and expect concrete results from them." (GX 84)
11/1 7:35 p.m.	Duncan Committee	Fruman	Receipt for \$10,000 donation to Committee to Elect Wes Duncan (GX 155)
11/1 7:41 p.m.	Laxalt for Nevada	Fruman	Receipt for \$10,000 donation to Laxalt for Nevada (GX 156)

November 3, 2018			
Date	From	To	Detail
11/3 8:18 a.m. – 12:42 p.m	Fruman	Muraviev Kukushkin Parnas	Pictures of Parnas with Rudolph Giuliani, and maps. “We are flying from Michigan to Indiana!!!!” (GX 86)
11/3 12:51 p.m.	Muraviev	Fruman Kukushkin Parnas	👍 (GX 86)
11/3 12:53 – 8:19 p.m	Fruman	Muraviev Kukushkin Parnas	Parnas, Fruman and Giuliani traveling and meeting political figures (GX 86)
11/3 8:29 p.m.	Parnas	Muraviev Kukushkin Parnas	“Kunya make sure you get Adam Laxalt the 12,500 !!! I was very embarrassed just now they said they never received the check from oasis. I don’t understand ?” (GX 86)
11/3 8:31-8:32 p.m.	Kukushkin	Parnas Muraviev Fruman	“Leva, the money where wired to Global Energy in order to cover all the donations whatsoever. What does it have to do with Oasis” “You are the one issuing them the checks NOT me or Andrey” (GX 86)
11/3 8:33 p.m.	Parnas	Muraviev Kukushkin Parnas	“I don’t want to play these games” “You are going to get everybody in trouble” (GX 86)

November 4 to 8, 2018			
Date	From	To	Detail
11/4-11/5	Fruman	Muraviev Kukushkin Parnas	Pictures of Parnas, DeSantis, Giuliani, other people, maps; video of Parnas, Fruman, Giuliani (GX 86)
11/6	n/a		Election Day
11/7 10:27 p.m.	Kukushkin	Parnas Muraviev Fruman	“Congratulation to everybody on victory in Florida!!! When can we get a license and find the stores?” (GX 86)
11/7 10:28 p.m.	Fruman	Muraviev Kukushkin Parnas	“Already soon!!!!” (GX 86)
11/7 10:29 p.m.	Kukushkin	Parnas Muraviev Fruman	“That certainly makes me happy. :)” (GX 86)
11/7 11:11 p.m.	Fruman	Muraviev Kukushkin Parnas	Pictures of DeSantis, Parnas, and others. (GX 86)
11/8 12:00 a.m.	Muraviev	Parnas Fruman Kukushkin	Picture of DeSantis, Parnas, others. “Congratulations on the victory, everyone!” “A very happy face.)” (GX 86)

United States v. Chi Ping Patrick Ho - Uganda Scheme 2014

SEP

9/15

HO asks his secretary to seek an appointment with "the new PGA Kutesa" during HO's trip to the U.S.

GX 250

9/22

HO tells Jeremic that he is in New York and is "tasked" with various "missions," including meeting with Kutesa.

GX 251

9/29

HO introduces himself to PGA Sam Kutesa's aide and requests a meeting with Sam Kutesa.

GX 252

OCT

10/10

HO meets with PGA Sam Kutesa in New York.

GX 253

Vuk Jeremic tells HO that he can confirm to Sam Kutesa "how fruitful the win-win cooperation with CEFC can be."

GX 254

United States v. Chi Ping Patrick Ho - Uganda Scheme 2014

NOV

11/20

HO directs Zhang Ya to prepare various reports.

GX 256

11/21

Zhang Ya sends draft reports to HO.

GX 257, 257-TX

11/23

HO provides a report to CEFC Chairman regarding HO's meeting with PGA Sam Kutesa in New York.

GX 258, 258-TX

DEC

12/2

HO emails Zhang Ya regarding another meeting with PGA Sam Kutesa

GX 259

12/6

HO asks Isaac Kutesa to have Sam Kutesa appoint the Chairman of CEFC as a "Special Adviser" to the PGA.

GX 260

12/18

HO provides a report to CEFC Chairman on his meeting with PGA Sam Kutesa.

GX 261, 261-TX

United States v. Chi Ping Patrick Ho - Uganda Scheme 2015

JAN

1/14

HO emails Isaac Kutesa regarding HO's interest in CEFC participating in various UN events.

GX 262

FEB

2/3

HO emails the PGA's aide to seek an invitation to speak at a UN event, and to meet with PGA Sam Kutesa in New York.

GX 264

2/21

HO emails the PGA's aide to seek another meeting with PGA Sam Kutesa in New York.

GX 266

United States v. Chi Ping Patrick Ho - Uganda Scheme 2015

MAR



JUL

3/5

HO reiterates his request that PGA Sam Kutesa appoint the Chairman of CEFC as a Special Adviser to the PGA.
GX 272

3/12

HO provides a report to CEFC Chairman regarding HO's discussions with PGA Sam Kutesa in New York.
GX 277, 277-TX

3/17

Sam Kutesa's wife emails HO regarding business issues, including the possibility of acquiring a bank in Uganda.
GX 280

7/29

Ho emails the PGA's aides regarding PGA Sam Kutesa's "impending visit to Hong Kong" where he will meet with the Chairman of CEFC.
GX 281, 282

United States v. Chi Ping Patrick Ho - Uganda Scheme 2015

AUG

8/2

PGA Sam Kutesa meets with HO and CEFC Chairman in Hong Kong, and appoints the Chairman as a special honorary consultant to the PGA.

GX 287, 287-TX

SEP

Sam Kutesa completes his one-year term as PGA, and returns to Uganda as Minister of Foreign Affairs.

GX 287, 287-TX

United States v. Chi Ping Patrick Ho - Uganda Scheme 2016

FEB

2/24

Sam Kutesa's wife emails HO, copying Sam Kutesa, to inform HO that Yoweri Museveni won reelection as President of Uganda, and to request a "contribution / donation" for Sam Kutesa's "foundation which he wishes to launch as soon as possible," and she provides the bank account information.

GX 283

2/28

HO replies to Sam Kutesa and his wife, including stating that "[w]e want to reconnect and catch up with you and renew our friendship as well as our mutual agreement and commit[.]ments."

GX 284

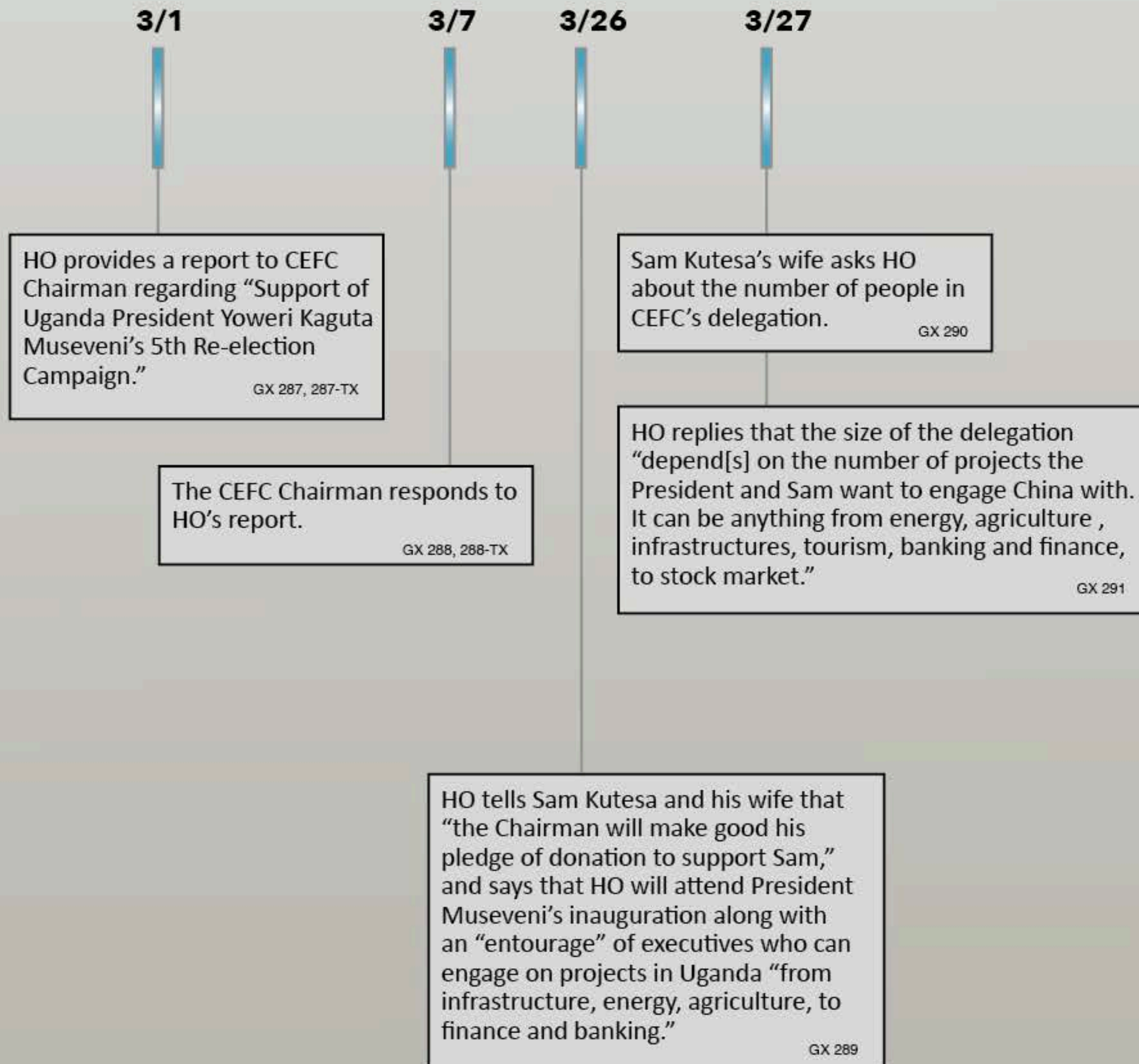
2/29

Sam Kutesa's wife asks HO to "confirm the contribution" and advises HO of an opportunity in the "banking sector in Africa."

GX 285

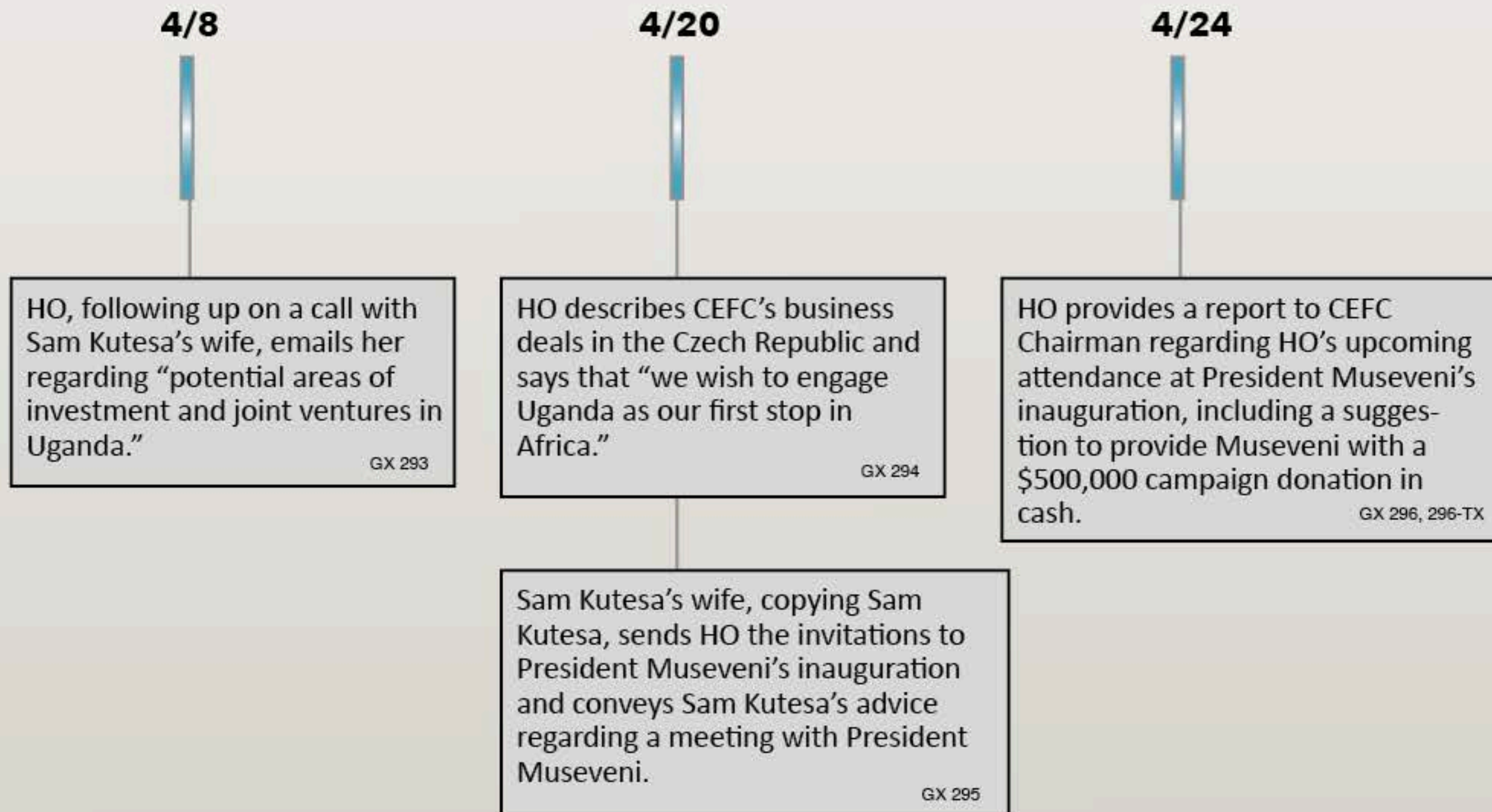
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MAR



United States v. Chi Ping Patrick Ho - Uganda Scheme 2016

APR



United States v. Chi Ping Patrick Ho - Uganda Scheme 2016

MAY

5/4

Zhang Ya, copying HO, instructs a CEFC employee to "contact the bank for the matter of getting USD 500,000.00 ready on May 10th."

GX 298, 298-TX

5/5

HO forwards to Zhang Ya the account information provided by the Kutesas.

GX 299

CEFC wires \$500,000 to the account requested by the Kutesas.

GX 300, 300-TX

Zhang Ya, copying HO, directs a CEFC employee to classify the \$500,000 wire under "other professional expenses."

GX 301, 301-TX

5/7

HO asks a CEFC employee to inform Sam Kutesa's wife "about the remittance" and to "request a formal receipt for our accounting purposes."

GX 303

HO tells Sam Kutesa's wife that he will lead the CEFC delegation and that they look forward to meeting with Sam Kutesa and President Museveni and to discussing "how CEFC the Company can play a major role in the future development of Uganda."

GX 304

HO schedules meeting to discuss gifts for Ugandan officials.

GX 305

5/8

HO tells Sam Kutesa's wife that they are bringing "some very 'nice' gifts to your President and to Minister Kutesa" and that they will need "special assistance with your customs procedure."

GX 309, 310

Sam Kutesa's wife, copying Sam Kutesa, emails HO regarding the agenda for HO's trip to Uganda.

GX 311

CEFC employee states that HO "highly expect[s] the delegation can meet some key persons at energy and financial sectors."

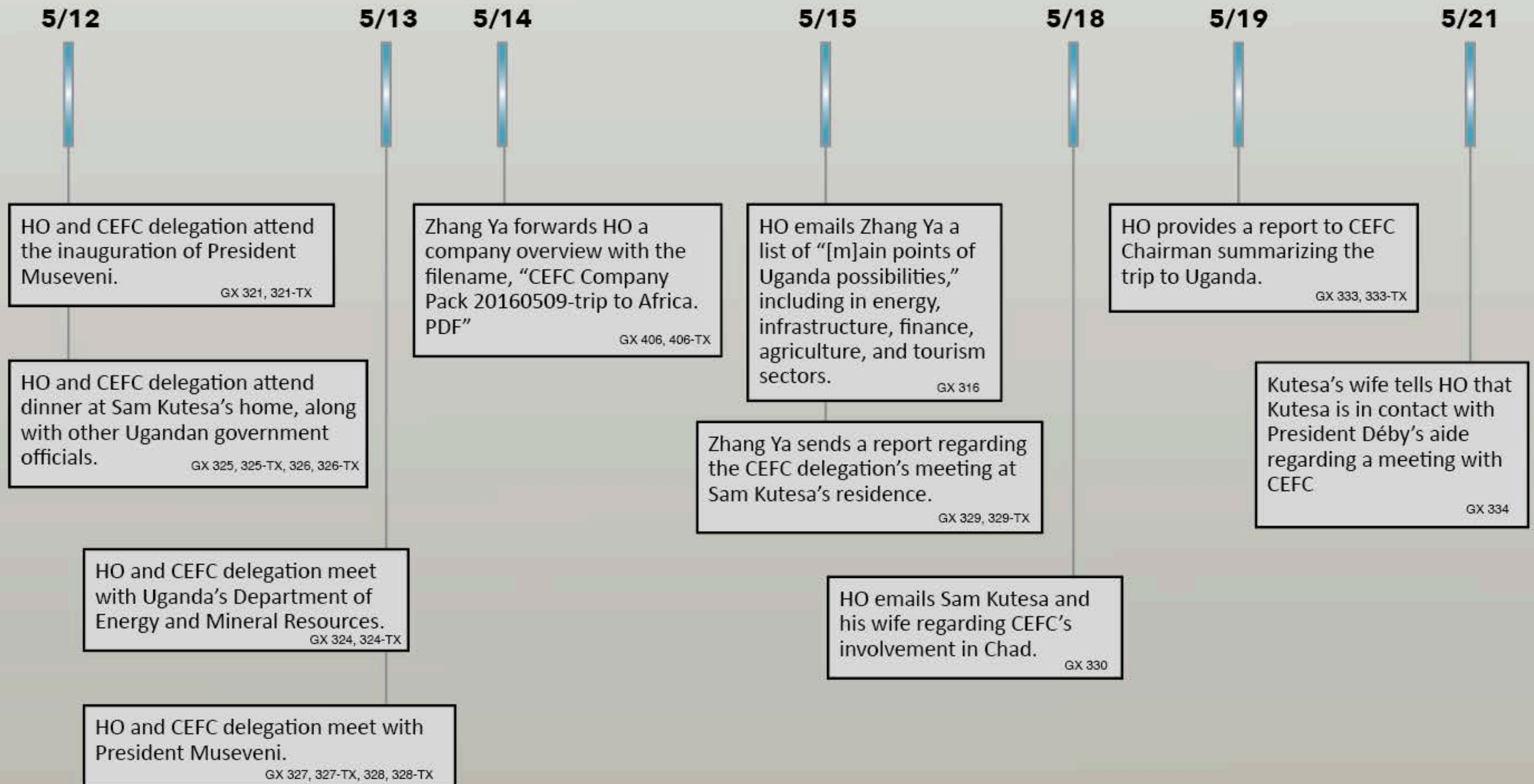
GX 312

CEFC employee states that "the meeting with the President is our main goal on this visit."

GX 313

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MAY



United States v. Chi Ping Patrick Ho - Uganda Scheme 2016

MAY

OCT

5/26

HO tells Sam Kutesa and his wife that CEFC is “very enthusiastic” about “working with you and the Kutesa family” in “joint-ventures in Uganda,” and that CEFC’s “first priority” is to “acquir[e] controlling shares of Barclay Bank Africa in Uganda.”

GX 336

5/27

Sam Kutesa’s wife, copying Sam Kutesa, replies that she is “writing to quickly [a]knowledge” HO’s email before “traveling in countryside for a few days.”

GX 337

HO responds to “reiterate our decision and strategies re Africa,” stating that “CEFC would like to partner with the Kutesa enterprise and would like to invest through you and with your family businesses (and the President’s) who can be the local operators.”

GX 338

10/13

Sam Kutesa’s wife emails HO regarding an opportunity to acquire a Ugandan bank, Crane Bank.

GX 340

HO writes a letter to a Ugandan Central Bank official, expressing interest in the possibility of acquiring Crane Bank.

GX 340, 341

10/14

HO asks Zhang Ya to direct the bank acquisition matter to the attention of another CEFC executive.

GX 344

10/25

Sam Kutesa’s wife provides a letter dated June 10, 2016, signed by Sam Kutesa, thanking CEFC for its \$500,000 contribution.

GX 345

10/27

February 8-14, 2012

Date	Time	From	To	Detail
2/8	11:00 am	N/A	N/A	Dean meeting with Len Litwin and others (RSA Office) (GX-2012B)
	11:51am	Dean	Adam	Phone Call (1 min)
	11:57am	Adam	Dean	Phone Call (3 mins)
	12:28pm	Dorego	Stephen Ross/ Bruce Beal	Email: "I saw Dean today . . ." (GX-1228)
	12:29pm	Adam	Dorego	Email, re: UER: "Charlie, Im looking to set up a meeting with the appropriate people from Glenwood Management regarding your Natural Gas and Electric usage. . . . Let me know if this would be possible, it would really help me out." (GX-1227)
2/13	9:13am	Adam	Dean	Phone call (2 min)
	10:25am	Glenwood	Dean	Phone call (2 mins) [next call]
	2:06pm	Dean	Adam	Phone call (1 min) [next call]
	5:31pm	Dean	Adam	Phone call (9 mins) [next call]
2/14	1:36pm	Dorego	Glenwood VP	Email, fw: UER: "Can we discuss this briefly next time we're both in the office?" (GX-1229)

**GOVERNMENT
EXHIBIT
3303
S1 15 Cr. 317 (KMW)**

GX-101, GX-108

April 16-20, 2012

Date	Time	From	To	Detail
4/16	12:00pm-1:30pm	N/A	N/A	Dean lunch with Dorego @ Porter House at Time Warner Center (GX-2012-C)
4/17	9:12am	Dorego	Glenwood VP	Email, re: UER: "Did [the Glenwood VP] get him yet?" (GX-1238)
	9:19am	Glenwood VP (Howard Heisner)	Dorego	Email, re: UER: "He is on the top of Howard's 'to call list,' but I don't believe Howard has contacted him yet. . ." (GX-1238)
4/19	11:22am	Glenwood VP	Adam	Email: "Charles Dorego referred me to you. Please contact me at your earliest convenience." (GX-2911)
	11:23am	Adam	Glenwood	Phone Call (5 mins)
	12:36pm	Dean	Adam	Phone Call (2 mins)
4/20	12:02pm	Adam	Glenwood	Phone Call (2 mins)

GX-101, GX-108

September 19-25, 2012

Date	Time	From	To	Detail
9/19 Wed.	9:35am	Dean	Adam	Phone Call (3 mins)
	12:30pm	N/A	N/A	Dean and Dorego attend REBNY Meeting (GX-2012E)
	1:49pm	Dorego	Adam	Phone Call (4 mins)
9/25 Tues.	8:21am	Adam	Dorego	Email, re: contaminated water on Long Island (GX-1290)
	9:25am	Dorego	Adam	Email: "Btw, who do you sell title for?" (GX-1290)
	10:25am	Adam	Dorego	Email: "I work with a company in Long Island, East Coast Abstract." (GX-1291)
	10:41am	Adam	Dean	Phone Call (3 mins)
	10:56am	Adam	Dorego	Email: "I just heard there may be some bad history there with Stan, I had NO idea. If you have a title you want to work through me I have a relationship with another company where I'd be able to work something out with out Stan or East Coast Abstract." (GX-1292)
	10:57am	Dorego	Adam	Phone Call (7 mins)

GX-101, GX-108, GX-109B

September 19-25, 2012 (cont'd)

Date	Time	From	To	Detail
9/25 (Tues)	11:27:38am	Adam	Dorego	Email, re: "Title": . . . "I could really use the work if you have anything for me, it's been a real slow year in the title world." (GX-1293)
	11:28am	Adam	Dean	Phone Call (4 mins)
	1:11pm	Adam	Dean	Email, fwd: "Title": "This is what I sent to Charlie and I still haven't heard anything back from him." (GX-2944)
	1:23pm	Dean	Runes	Phone call (1 min)
	1:25pm	Dean	Adam	Email, re: "Title": "Following up. Be patient." (GX-2944)
	1:28pm	Adam	Dean	Email, re: "Title": "Placing title happens quick. I don't want to lose out cause Stan screwed up." (GX-2944)
	1:35pm	Dean	Adam	Email, re: "Title": "I know." (GX-2944)
	3:50pm	Dorego	Runes cell	Phone Call (4 mins)
	4:00pm	Dorego	ALS	Phone Call (10 mins)
	4:29pm	Runes cell	Dean	Phone Call (1 min)
	4:35 pm	Adam	Dean	Phone Call (3 mins) [next call]

GX-101, GX-108, GX-109B, GX-114

October 3-4, 2012

Date	Time	From	To	Detail
10/3	11:19am	Adam	Dorego	Email: "I have attached some information on the title company I am working with. Let me know if theres anything else you need. Talk soon." (GX-1304)
	12:31pm	Dorego	Adam	Email: "Call me" (GX-1304)
	12:50pm	Adam	Dorego	Phone Call (8 mins)
	12:58pm	Dorego	Dwyer	Phone Call (2 mins) [next call]
	1:00pm	Dorego	Adam	Phone Call (2 mins) [next call]
	1:20pm	Adam	East Coast Abstract	Phone Call (8 mins)
	1:28pm	Adam	East Coast Abstract	Phone Call (1 mins)
	2:07pm	Adam	Dean	Phone Call (4 mins) [next call]
10/4	12:00pm -1:30pm	N/A	N/A	Dean Skelos and Dorego attend meeting with Rent Stabilization Executive Board (GX-2012-F)

October 9-10, 2012				
Date	Time	From	To	Detail
10/9	8:02pm	Dorego	Adam	Email, fwd: updated Abtech contract (GX-1311)
	8:23pm	Adam	Dorego	Email: "Great. I will look over tonight and talk with Dad tomorrow." (GX-1311)
	8:28pm	Dorego	Adam	Email: "I can do a 20,000 referral on the title. That ok?" (GX-1311)
	8:31pm	Adam	Dorego	Email: "Absolutely, that's great. Going through Tom?" (GX-1311)
	8:32pm	Dorego	Adam	Email: "Yes." (GX-1311)
	9:03pm	Adam*	Dean	Phone Call (1 min)
	10:00pm	Dean	Adam	Phone Call (1 min)
	10:01pm	Dean	Adam	Phone Call (1 min)
10/10	11:58am	Adam	Dorego	Email: "Can you talk?" (GX-1311)
	12:00pm	Adam	Dorego	Phone Call (5 mins)
	1:46pm	Adam	Dean	Phone Call (1 min)

GX-101, GX-108, GX-109B

October 25-26, 2012

Date	Time	From	To	Detail
10/25	1:25pm	Adam	Dorego	Phone Call (1 min)
	1:26pm	Adam	Dorego	Phone Call (6 min) [next call]
	1:32pm	Adam	Dean	Phone Call Begins (5 mins) [next call]
	1:34pm	Dorego	Adam	Email: "I've been waiting for the gas line from National Grid from the street to the house for months. I was last told it was on the schedule for 23rd of Oct." (GX-1317)
	1:37pm	Adam	Dean	Phone Call Ends (5 mins)
	1:39pm	Adam	Locascio	Email, copy to Dorego: "Please look into this for me." (GX-1317)
10/26	2:49pm	Liz Liguori (NYS Senate)	Locascio	Email: "Here is the response from nat'l grid: . . . We had reached out to our Contract Forman who told us that Asplundh is on site today for us." (GX-1317)
	3:06pm	Locascio	Adam	Email, Fwd: "response from nat'l grid" (GX-1317)
	3:19pm	Adam	Dorego	Email, Fwd: "See below. Is all ok?" (GX-1317)
	3:28pm	Dorego	Adam	Email: "It's in today. . . . Thank you." (GX-1317)
	4:42pm	Dean	Adam	Phone call (5 mins)

GX-101, GX-108, GX-109B

February 15-19, 2013				
Date	Time	From	To	Detail
2/15	12:08pm	Adam	Dwyer	Phone Call (2 mins)
2/18	12:26pm	Dwyer	Adam	Phone Call (1 min)
	1:00pm-2:00pm	Adam	N/A	Email reminder: "Cool fish Dwyer" (GX-2980)
2/19	N/A	Adam	N/A	Adam deposits \$20,000 check from ALS (GX-1016)
	9:17am	Adam	Dorego	Phone Call (3 mins)
	11:05am	Adam	Mortgage Agent	Phone Call (2 mins)
	11:10am	Adam	Real Estate Agent	Phone Call (4 mins)
	11:32am	Adam	Dean	Phone Call (6 mins)

August 29, 2012

Time	Detail
9:49am	White emails Adam Abtech's "Skelos Proposed Engagement Structure" and adds "I'll give you a call at 10 am and can walk through this with you." (GX-2435)
10:04am	White (919-900-4105) calls Adam (39 mins)
10:45am	Adam calls Dean (5 mins) [next call]
10:50am	Adam forwards to Dean Abtech's "Proposed Engagement Structure" (GX-2934)

September 5, 2012	
Time	Detail
8:44am	White emails Adam draft Abtech Consulting Agreement (GX-2438)
8:55am	Adam forwards to Dean : "Please print this and review." (GX-2937)
9:01am	Adam calls Dean (4 mins)
10:47am	Adam calls Dean (2 mins)
10:50am	Adam calls Nassau County Attorney Ciampoli (1 min) [next call]
11:08am	Adam calls Dorego (4 mins)
11:13am	Adam emails Dorego draft Abtech Consulting Agreement (GX-1275)
11:52am	Dorego forwards to Runes: "Pls look at the last few pages on compensation. I'm inclined to tell adam to forget this and glen to f himself." (GX-1276)
12:53pm	Runes calls Dorego (2 mins)
7:40pm	Dean calls Runes (3 mins)
7:42pm	Runes calls Dorego (1 min)
7:44pm	Runes cell calls Dean (2 mins)

September 13, 2012

Time	Detail
12:02pm-12:08pm	Adam calls Dean's cellphone (6 mins)
12:37pm-12:39pm	Adam calls Nassau County Executive's Office (2 mins)
12:54pm	Adam call with Dean's Albany Office (start of call)
12:54pm	Adam emails Rink and White, copy to Dorego: "I am sorry to report that I have canceled our meeting on 9/18 with the Nassau County Executive due to our business arrangement not being worked out yet. I have left the door open with the County to meet at another time but before we move forward we need to work out our situation. . . ." (GX-1287)
12:59pm	Adam call with Dean's Albany Office (end of call)

November 8, 2012

Time	Detail
2:08pm	White emails Adam : “We heard that Suffolk and Nassau County are putting their FEMA packages together real-time and we have about a 3-week window to make something happen on that . . . This is ahead of our planned timeline but I wanted to reach out and ask if you think you could assist with this (I assume yes given your contacts!) immediately.” (GX-2456)
2:16pm	Adam forwards to Dean : “What should I do?” (GX-2957)
2:16pm	Adam calls Dean ¹ (3 mins)
2:19pm	Adam calls White (5 mins) [next call]
2:20pm	Adam adds Dean to three-way call with White (4 mins)
2:29pm	Adam calls Dean (2 mins)
2:29pm	Adam emails Dean : “AbTech Industries . . . Bjornulf White . . . Executive Vice President of Corporate Strategy Cell - (203)253-8443” (GX-2958)

^[1] Dean Skelos's phone records unavailable for November 8, 2012.

November 26, 2012	
Time	Detail
9:30am-10:30am	Meeting between Dean and County Executive Mangano (GX-2012I)
11:26am	Adam calls Dean (2 mins)
11:27am	Adam calls White (2 mins) [next call]
5:02pm	Dean calls Adam (4 mins)
5:18pm	Adam emails White and copies Dorego: "I just received word that AbTech will receive an RFP from Nassau County to be included in the FIMA recovery package. It should get to us with in 7-10 business days." (GX-2465)

December 4-7, 2012

Date	Time	From	To	Detail
12/4	1:15pm	White	Adam	Email: "Hey Adam, will you be hearing from the county when they post the RFP?" (GX-2472)
	1:34pm	Adam	White	Email: "Yes. Seeing the county executive tonight and will follow up on when that will come out." (GX-2472)
	2:09pm	Adam*	Dean	Phone Call (1 min)
	2:16pm	Adam*	Dean	Phone Call (1 min) [next call]
	2:18pm	Adam	Dean's Home	Phone Call (6 min)
	5:33pm	Dean	County Executive Mangano	Phone Call (1 min)
	5:35pm	County Executive Mangano	Dean	Phone Call (2 min) [next call]
	6:14pm	Adam	Dean	Phone Call (7 mins)

GX-101, GX-108, GX-111

December 4-7, 2012

Date	Time	From	To	Detail
12/7	1:23pm	Dean	Adam	Phone Call (3 mins)
	1:28pm	Dean	County Executive Mangano	Phone Call (1 min) [next call]
	1:34pm	Dean	County Executive Mangano	Phone Call (3 mins) [next call]
	1:41pm	Dean	County Executive Mangano	Phone Call (2 mins)
	1:42pm	Dean*	Adam	Phone Call (1 min) [next call]
	1:45pm	Adam*	Dean	Phone Call (1 min) [next call]
	1:48pm	Dean	Adam	Phone Call (3 mins) [next call for Dean and Adam]

GX-101, GX-108, GX-111

December 10, 2012	
Time	Detail
12:26pm	White emails Adam : "Have you heard anything yet from Nassau County?" (GX-2474)
12:29pm	Adam emails White: "Will follow up now." (GX-2474)
1:34pm	Dean calls County Executive Mangano (2 mins)
1:36pm	County Executive Mangano calls Dean (3 mins) [next call]
1:39pm	Dean calls Adam (2 mins) [next call]
1:41pm	Adam calls White (3 mins) [next call]

GX-101, GX-108, GX-111, GX-118

February 4-7, 2013				
Date	Time	From	To	Detail
2/4	10:11am	Adam	Dean	Phone Call (2 mins)
	10:13am	Dean	County Executive Mangano	Phone Call (4 mins) [next call]
2/7	9:22am	Adam	Dean	Phone Call (4 mins)
	9:27am	Dean	County Executive Mangano	Phone Call (2 min) [next call]
	9:46 am	Adam	Dean	Phone Call (5 mins)
	10:39am	Adam	Dean	Phone Call (4 mins)
	11:13am	County Executive Mangano*	Dean	Phone Call (1 min)
	11:40am	Dean	County Executive Mangano	Phone Call (2 mins)
	11:43am	County Executive Mangano	Dean	Phone Call (1 mins) [next call]
	1:05pm	Dean	Adam	Phone Call (6 mins)

GX-101, GX-108, GX-111

February 14, 2013	
Time	Detail
8:48am	Adam* calls County Attorney Ciampoli (1 min)
8:54am	Adam* calls Dean (1 min) [next call]
8:55am	Dean calls Adam (6 mins) [next call for Adam]
1:20pm	White emails Adam : "hey - just a quick note to see if you heard anything from Nassau. I've been checking the solicitation board regularly but nothing has posted yet..." (GX-2489)
1:21pm	Adam* calls White (1 min)
1:22pm	White calls Adam (2 mins)
2:27pm	Dean calls County Attorney Ciampoli (3 mins)
2:48pm	Dean calls County Executive Mangano (3 mins)
4:37pm	Adam* calls Dean (1 min)
4:44pm	Adam calls County Attorney Ciampoli (1 min) [next call]
4:49pm	County Attorney Ciampoli calls Adam (12 mins) [next call]

February 20-22, 2013

Date	Time	From	To	Detail
2/20	8:43pm	Dean	Adam	Phone Call (2 mins)
	9:00pm	White	Adam	Phone Call (2 mins) [next call]
2/21	9:43am	Dean	County Attny. Ciampoli	Phone Call (4 mins)
	9:57am	Adam	County Attny. Ciampoli	Phone Call (8 mins) [next call for Ciampoli]
	10:15am	Dean	Adam	Phone Call (10 mins)
	12:43pm	Adam	White	Phone Call (1 min)
	3:26pm	Ciampoli	Mangano	Phone Call (2 mins)
2/22	8:35am	Adam	County Attny. Ciampoli	Phone Call (3 mins)
	11:20am	Dean*	Adam	Phone Call (1 min)
	12:22pm	Dean	Mangano	Phone Call (2 mins)
	1:40pm	Adam	DPW Commissioner	Phone Call (3 mins)
	1:46pm	White Assistant	White	Email: .pdf of Nassau County RFP (GX-2490)
	1:57pm	White	Adam	Phone Call (3 mins)
	4:38pm	Adam	Dean	Phone Call (4 mins)

GX-101, GX-108, GX-111, GX-118, GX-119

April 3-10, 2013

Date	Time	From	To	Detail
4/3 Wed.	10:19am	White	Adam	Email, re: "Nassau Proposal": "Going to send someone up to you to deliver late afternoon/early evening." (GX-2499)
4/4 Thurs.	11:26am	Dean	Adam	Phone Call (2 mins)
	1:11pm	Ken Arnold	Adam	Phone Call (1 min)
	4:00pm	N/A	N/A	Abtech RFP Delivery Deadline (GX-2490)
4/5 Fri.	5:26pm	White	Adam	Phone Call (8 mins)
	5:34pm	Adam	Dean	Phone Call (6 mins) [Next Call]
4/8 Mon.	8:54am	Adam	Dorego	Phone call (6 mins)
	9:01am	Adam*	Dean	Phone call (1 min)
	9:11am	Dean	Adam	Phone call (2 min)
	7:07pm	Dorego	Rink	Email: "I need to speak to you tomorrow about Adam Skelos" (GX-1334)

GX-101, GX-108, GX-109B, GX-118

April 3-10, 2013 (cont'd)

Date	Time	From	To	Detail
4/10 Wed.	2:07pm	Dorego	Rink	Email re: "Adam": "I'm told he's about 45 days away from producing the legislation . . . He's hesitant (and his dad called) to do it with the engineer's making more than him. If he doesn't get like a 4% commission I think they don't think it's worth pushing though." (GX-1337)
	5:41pm	White	Rink	Email, re: "Adam": "I can't believe he's going to try to hold us hostage to renegotiate the contract." (GX-2502)
	6:30pm	Rink	Dorego	Phone call (4 mins)

April 19-23, 2013				
Date	Time	From	To	Detail
4/19 Fri.	3:03pm	Rink	White	Email: "Ok so are you ready for me to reach out to Charlie Dorego regarding the issues and to confirm I can mention Adam spoke to you and you spoke to me." (GX-2505A)
	3:09pm	White	Rink	Email: "Confirmed." (GX-2505A)
4/22 Mon.	11:05am	Rink	White	Phone Call (29 mins)
	2:47pm	Dorego	Rink	Phone call (6 mins)
	3:01pm	White	Rink	Phone call (12 mins) [next call]
4/23 Tues.	2:22pm	Adam	White	Phone call (11 mins)
	2:33pm	Adam*	Dean	Phone call (1 min) [next call]
	3:35pm	Dean	Adam	Phone call (2 mins)

May 28-31, 2013

Date	Time	From	To	Detail
5/28	10:44am	Adam	Dean	Phone Call (1 min)
	10:45am	Dean	County Attorney Ciampoli	Phone Call (5 min) [next call]
	10:54am	Adam	County Attorney Ciampoli	Email: "Below is a small letter we drafted acknowledging that AbTech was chosen by Nassau county to be considered by the leg for the work on their storm water drainage pipes. We need something like that signed for us to show the company share holders before the June 3rd meeting." (GX-2986)
	3:54pm	Adam	White	Email: "Followed up with county attorney today, he said he was working on something and I let him know about the June 3 deadline." (GX-2516)
5/29	1:05am	County Attorney Ciampoli	Adam	Email: "On it." (GX-2987)

GX-101, GX-108, GX-119

May 28-31, 2013 (cont'd)

Date	Time	From	To	Detail
5/31	9:48am	Adam	County Attorney Ciampoli	Phone Call (6 mins)
	9:54am	Adam*	Dean	Phone Call (1 min) [next call]
	9:58am	Adam	Dean	Phone Call (2 mins)
	10:00am	Adam	DPW Commissioner	Phone Call (1 min) [next call]
	10:17am	Adam	Dean	Phone Call (2 mins)
	12:19pm	Dean	County Exec. Mangano	Phone Call (2 mins) [next call]
	12:51pm	County Exec. Mangano	Dep. County Exec. Walker	Phone Call (2 mins)
	1:08pm	County Attorney Ciampoli	Adam	Phone Call (7 mins)
	3:35pm	Dep. County Exec. Walker	DPW Commissioner	Phone Call (1 min)
	4:04pm	Dean	Adam	Phone Call (3 mins)
	4:06pm	Adam*	White	Phone Call (1 min) [next call]
	4:08pm	Adam	County Attorney Ciampoli	Phone Call (2 mins) [next call]
	4:09pm	White	Adam	Phone Call (9 mins) [next call]
	4:17pm	Adam	County Attorney Ciampoli	Phone Call (8 mins) [next call]
	N/A	DPW Commissioner	Abtech/White	<p>"We are pleased to inform you that . . . the County has determined that your firm possess [sic] the requisite skill to perform the work described in your proposal."</p> <p>(GX-2301)</p> <p>GX-101, GX-108, GX-117, GX-118, GX-119</p>

August 12-13, 2013

Date	Time	From	To	Detail
8/12	10:06am	White	Adam	Email re: "Letter from Nassau" (GX-2988)
	10:16am	Adam	Gail Skelos	Email fwd: "Letter from Nassau": "Show you know who." (GX-2991)
	10:30am	Gail	Adam	Email: " . . . Will do in hour or so. Not with now." (GX-2994)
	11:07am	Dean*	Adam	Phone Call (2 mins)
	11:15am	Adam	Cameron	Email: "John, See below. Any help on this would be much appreciated." (GX-2995)
	12:09pm	Adam	Locascio	Email fwd: "Letter from Nassau" (GX-2996)
	1:49pm	Cameron	Walker	Email fwd: "Letter from Nassau County to AbTech" (GX-2532B)
	2:31pm	Cameron	Gail Skelos	Email: "Got the info. Spoke to Rob. He's receptive to sending the letter." (GX-2999)

GX-108

August 12-13, 2013 (cont'd)

Date	Time	From	To	Detail
8/13	12:05pm	Dean	Cameron	Phone Call (2 mins)
	12:18pm	Adam	Dean	Phone Call (3 mins) [next call]
	3:31pm	Cameron	Walker	Phone Call (1 min)
	4:31pm	Walker	Cameron	Phone Call (3 mins)
	5:01pm	Cameron	Adam	Phone Call (2 mins)
	6:55pm	Adam	Dean	Phone Call (3 mins)
	6:55pm	Mangano	Dean	Phone Call (2 min) [call waiting]
	7:13pm	Mangano	Dean	Phone Call (2 mins)
	7:14pm	Walker	White	Email: "I am pleased to let you know that the Nassau County Legislature unanimously approved the contract. . . ." (GX-2533)
	7:15pm	Dean	Adam	Phone call (1 min) [next call]
	7:16pm	Adam	White	Phone call (1 min) [next call]
	7:52pm	Cameron	Dean	Email: "This is what I sent to Robbie yesterday after he and I spoke. I imparted the urgency to him on the phone. I was careful of what I put in the e-mail as you never know where it could wind up. Glad it finally got done!" (GX-2532-B)
	7:57pm	Adam	Dean	Phone Call (7 mins)
	8:28pm	Dean	Cameron	Email: "All happy" (GX-2532-B) GX-101, GX-107, GX-108, GX-111

Dec. 17, 2014				
Date	Time	From	To	Detail
12/17	12:28pm	Dean	Avella	Phone Call (3 min)
	12:32pm	Avella	Adam	Phone Call (1 min) [next call]
	12:39pm	Adam	Dean	Recorded Phone Call: "Dean: Well, we're going to totally focus on that other thing now, okay? . . . Mike Avella's going to call you. We're going to refocus on that other stuff, okay?" (GX-1428)
	2:02pm	Adam	Avella	Phone Call (1 min)

GX-105, GX-108

December 5-12, 2012				
Date	Time	From	To	Detail
12/5	5:30pm-8:30pm	N/A	N/A	Park Strategies Holiday Party (GX-2012-H-1)
	5:46pm	Dean	A. Bonomo	Phone Call (2 mins)
12/6	7:54am	Dean*	Adam	Phone Call (1 mins)
	8:01am	Dean*	Adam	Phone Call (1 mins)
	8:02am	Dean	Ann Marie Skelos	Phone Call (1 mins)
	8:03am	Adam	Dean	Phone Call (12 mins)
	9:02am	Dean	Adam	Phone Call (4 mins) [next call for Dean]
	9:56am	Adam	PRI	Phone Call (2 mins) [next call]
	9:58am	Adam	A. Bonomo	Phone call (1 min) [next call]

GX-101, GX-104, GX-108

December 5-12, 2012 (cont'd)				
Date	Time	From	To	Detail
12/7	11:51am	Adam	Dean	Phone Call (7 mins)
	1:07pm	Adam	Dean	Phone Call (5 mins)
	1:17pm	Adam	PRI	Phone Call (2 mins)
	1:17pm	Dean	A. Bonomo	Phone Call (3 mins)
	1:57pm	Adam	Dean	Phone Call (4 mins)
	2:32pm	Adam	Dean	Phone Call (5 mins)
	2:37pm	Adam	PRI	Phone Call (2 mins) [next call]
	2:38pm	Adam	A. Bonomo	Phone Call (2 mins) [next call]
	2:42pm	Adam	PRI	Phone Call (4 mins)
	2:46pm	Adam	Dean	Phone Call (3 mins) [next call]
12/12	N/A	N/A	N/A	Adam fills out "Employee Information" Document at PRI (GX-701)

January 10, 2013

Time	Detail
9:36am	Adam call with PRI landline (4 mins)
9:40am	Adam call with PRI landline (2 mins)
N/A	Curcio notes: "I called Adam on his cellphone and asked where he was he said on appointments and again mentioned his arrangement between Anthony and his father regarding him working 2 days a week." (GX-715)
9:42am	Adam* calls Dean (1 min)
9:43am	Adam* calls Dean (1 min)
9:44am	Dean calls Adam (3 mins)
10:42am	Dean calls Anthony Bonomo cell (2 mins) [next call]
11:07am	PRI landline calls Dean (21 mins) [next call]
11:27am	Dean calls Adam (6 mins) [next call]

GX-101, GX-108

November 1-14, 2016				
Date	Time (ET)	From	To	Detail
11/1	11:39 AM	Paul Manafort	Dennis Raico, Bruce Baldinger, Jeff Yohai, Steve Calk	Email: "So what is the timetable to close now?" (GX 219)
11/8	5:02 PM	Dennis Raico	Darin Judis, Raymond Marquez, Ann DiCola	Email: asks B of I employees if they should expect an approval by close of business, saying "I will need to report back to our Chairman" (GX 225)
	N/A	N/A	N/A	Election Night
11/9	12:58 AM	N/A	N/A	Steve Calk makes \$2700 donation to Trump campaign (GX 1251)
	9:20 AM	Paul Manafort	Bruce Baldinger, Jeff Yohai	Email: "Got this from Steve last night: 'Paul, I hope you're having a great night. We should have your approval all wrapped up by tomorrow I am being told. . . . Do you need me in New York? I am ready to support in any way.'" (GX 1152)
	12:09 PM	Steve Calk	Paul Manafort	Phone call (11 secs) (GX 901-2)
	12:10 PM	Steve Calk	Paul Manafort	Phone call (10 secs) (GX 901-2)
	12:10 PM	Steve Calk	Paul Manafort	Phone call (5 minutes, 34 secs) (GX 901-2)
	7:16 PM	Dennis Raico	Javier Ubarri, Steve Calk	Email: "Hello Javier, Pursuant to our conversation a few minutes ago, here is the synopsis you requested on the Manafort file." (GX 234)
11/10	5:24 PM	Javier Ubarri	Jim Brennan, Dennis Raico, Eric Buteyn, Matthew MacDonald	Email: "If we are considering this as a portfolio loan its important that Matt or Eric looks at it." (GX 231, 231-A)
11/11	9:14 AM	Javier Ubarri	Dennis Raico, Steve Calk	Email: responds to Raico synopsis with summary of options, with \$9.5 million loan as least preferred option, and writes "We can do any of these options." (GX 234)
	3:22 PM	Matthew MacDonald	Dennis Raico, Javier Ubarri, Jim Brennan, Eric Buteyn, Steve Calk	Email: "I do not have the ability to finish the underwrite today but I would feel confident in issuing a term sheet or a commitment to the borrower" (GX 231, 230-A)
	3:36 PM	Javier Ubarri	Matthew MacDonald, Dennis Raico, Jim Brennan, Eric Buteyn, Steve Calk	Email: "Please don't do any more work until we get some direction from Steve" (GX 231)
	3:31 PM	Steve Calk	Dennis Raico	Phone call (1 sec) (GX 901-A-37)
	3:32 PM	Dennis Raico	Steve Calk	Phone call (12 minutes, 29 secs) (GX 901-A-37)
	4:48 PM	Steve Calk	Dennis Raico	Phone call (15 minutes, 29 secs) (GX 901-A-37)
	5:10 PM	Dennis Raico	Paul Manafort, Bruce Baldinger, Steve Calk, Dennis Raico	Email: "Paul, Congratulations! Please see the attached approval term sheet." (GX 237)
	Unknown	N/A	N/A	Raico journal entry: "Steve: Trump Executive Council Secretary of the Treasury -> check w/ Paul" (GX 51-2)
11/12	2:05 PM	Steve Calk	Paul Manafort	Phone call (18 minutes, 25 secs) (GX 901-A-1)
11/14	12:20 AM	Steve Calk	Paul Manafort	Email: attaching list of prospective roles, beginning with Secretary of Treasury (GX 244)
	1:18 AM	Steve Calk	Paul Manafort	Email: "Are you aiding in the transition in any type of formal capacity?" (GX 245, 245-A)
	1:48 AM	Steve Calk	Jim Brennan, Javier Ubarri, Dennis Raico	Email: "Please ensure that this loan is documented perfectly so that our lien on both properties as well as the cash account at The Federal Savings Bank are FULLY enforceable." (GX 248)
	8:20 AM	Paul Manafort	Steve Calk	Email: "Total background but involved directly" (GX 245, 245-B)
	8:22 AM	Steve Calk	Paul Manafort	Email: "Awesome." (GX 245, 245-C)

December 21-23, 2016				
Date	Time (ET)	From	To	Detail
12/21	12:18 PM	Steve Calk	Paul Manafort	Phone call (9 mins, 26 secs) (GX 901-A-13)
	1:35 PM	Steve Calk	Bruce Baldinger, Dennis Raico, Paul Manafort	Email: "Bruce, we are in no way scheduling a closing until this loan is fully structured, underwritten and approved" and "We are working very hard to help find solutions to help Paul out in his hour of need." (GX 295)
	6:41 PM	Paul Manafort	Anthony Scaramucci	Text: "Any progress on Stephen Calk?" (GX 611)
	6:54 PM	Steve Calk	Paul Manafort	Phone call (28 secs) (GX 901-2)
	7:46 PM	Anthony Scaramucci	Paul Manafort	Text: "Would he take under. Secretary of the Army? Are we double sure" "If so I think we can get it done" (GX 611)
	7:49 PM	Steve Calk	Paul Manafort	Phone call (11 mins, 25 secs) (GX 901-A-14)
	8:15 PM	Paul Manafort	Anthony Scaramucci	Text: "Yes he will def take it" (GX 611)
12/22	12:37 PM	Dennis Raico	Steve Calk	Phone call (1 min, 24 secs) (GX 901-A-35)
	4:24 PM	Steve Calk	Paul Manafort, Javier Ubarri, Jim Brennan, Dennis Raico, Steve Calk	Email: "Attached is the term sheet we discussed last evening" and "Our plan is to close this next week if I get this executed document back today by 5pm CST" (GX 299)
	4:33 PM	Steve Calk	Dennis Raico	Phone call (3 mins, 41 secs) (GX 901-A-35)
	5:32 PM	Steve Calk	Paul Manafort	Email: "I have received your signed term sheet. May I have your authorization to [] set up your new pledge account [and] Deduct your fees" (GX 302, 302-A)
	7:36 PM	Paul Manafort	Steve Calk	Email: Manafort confirms permission to set up new account and deduct fees (GX 302, 302-B)
	8:37 PM	Steve Calk	Paul Manafort	Email: "Thanks very much. Please call my cell phone if you have a moment." (GX 302)
	9:48 PM	Steve Calk	Paul Manafort	Phone call (1 min, 20 secs) (GX 901-A-15)
12/23	11:05 AM	Steve Calk	Paul Manafort	Phone call (1 min, 1 sec) (GX 901-A-16)
	11:58 AM	Steve Calk	Paul Manafort	Phone call (6 mins, 40 secs) (GX 901-A-16)