

FEDERAL BUREAU OF INVESTIGATION

FOI/PA

DELETED PAGE INFORMATION SHEET

Civil Action No.: 19-cv-1278 / 19-cv-1626

FOIA: 1492006-0; 1432673-0; 1432673-1; 1433273-0

PDF Title:19-cv-1278 Release 23

Total Withheld Pages = 496

Bates Page Reference	Reason for Withholding (i.e., exemptions with coded rationale, duplicate, sealed by order of court, etc.)
FBI(19cv1278) 9401	Referral/Consult
FBI(19cv1278) 9402	Referral/Consult
FBI(19cv1278) 9403	Referral/Consult
FBI(19cv1278) 9404	Referral/Consult
FBI(19cv1278) 9405	Referral/Consult
FBI(19cv1278) 9406	Referral/Consult
FBI(19cv1278) 9407	Referral/Consult
FBI(19cv1278) 9408	Referral/Consult
FBI(19cv1278) 9409	Referral/Consult
FBI(19cv1278) 9410	Referral/Consult
FBI(19cv1278) 9411	Referral/Consult
FBI(19cv1278) 9412	Referral/Consult
FBI(19cv1278) 9413	Referral/Consult
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FBI(19cv1278) 9425	Referral/Consult
FBI(19cv1278) 9426	Referral/Consult
FBI(19cv1278) 9427	Referral/Consult
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FBI(19cv1278) 9432	Referral/Consult
FBI(19cv1278) 9433	Referral/Consult
FBI(19cv1278) 9434	Referral/Consult

Bates Page Reference	Reason for Withholding (i.e., exemptions with coded rationale, duplicate, sealed by order of court, etc.)
FBI(19cv1278) 9435	Referral/Consult
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FBI(19cv1278) 9438	Referral/Consult
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FBI(19cv1278) 9440	Referral/Consult
FBI(19cv1278) 9441	Referral/Consult
FBI(19cv1278) 9442	Referral/Consult
FBI(19cv1278) 9443	Duplicate
FBI(19cv1278) 9444	Duplicate
FBI(19cv1278) 9445	Duplicate
FBI(19cv1278) 9446	Duplicate
FBI(19cv1278) 9447	Duplicate
FBI(19cv1278) 9448	Duplicate
FBI(19cv1278) 9449	Duplicate
FBI(19cv1278) 9450	Duplicate
FBI(19cv1278) 9454	b3; b5 - per DOJ/OIP; b6; b7A; b7C
FBI(19cv1278) 9455	b3; b5 - per DOJ/OIP; b6; b7A; b7C
FBI(19cv1278) 9456	b3; b5 - per DOJ/OIP; b6; b7A; b7C
FBI(19cv1278) 9457	b3; b5 - per DOJ/OIP; b6; b7A; b7C
FBI(19cv1278) 9458	b3; b5 - per DOJ/OIP; b7A
FBI(19cv1278) 9459	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9460	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9461	b3; b5 - per DOJ/OIP; b6; b7A; b7C
FBI(19cv1278) 9462	b3; b5 - per DOJ/OIP; b7A
FBI(19cv1278) 9463	b3; b5 - per DOJ/OIP; b7A
FBI(19cv1278) 9464	b3; b5 - per DOJ/OIP; b7A
FBI(19cv1278) 9465	b3; b5 - per DOJ/OIP; b6; b7A; b7C
FBI(19cv1278) 9466	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9467	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9468	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9469	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9470	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9471	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9472	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9473	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9474	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9475	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9476	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9477	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9478	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9479	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9480	b3; b5 - per DOJ/OIP

Bates Page Reference	Reason for Withholding (i.e., exemptions with coded rationale, duplicate, sealed by order of court, etc.)
FBI(19cv1278) 9481	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9482	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9483	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9484	b3; b4; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9485	b3; b4; b5 - per DOJ/OIP
FBI(19cv1278) 9486	b3; b4; b5 - per DOJ/OIP
FBI(19cv1278) 9487	b3; b4; b5 - per DOJ/OIP
FBI(19cv1278) 9488	b3; b4; b5 - per DOJ/OIP
FBI(19cv1278) 9489	b3; b4; b5 - per DOJ/OIP
FBI(19cv1278) 9490	b3; b4; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9491	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9492	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9493	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9494	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9495	b3; b5 - per DOJ/OIP; b6; b7A; b7C
FBI(19cv1278) 9496	b3; b5 - per DOJ/OIP; b7A
FBI(19cv1278) 9497	b3; b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9499	b3; b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9502	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9503	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9504	b3; b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9506	b3; b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9508	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9509	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9510	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9511	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9512	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9513	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9514	b3; b5 - per DOJ/OIP; b6; b7A; b7C
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FBI(19cv1278) 9519	b3; b5 - per DOJ/OIP
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FBI(19cv1278) 9521	b3; b5 - per DOJ/OIP
FBI(19cv1278) 9522	b3; b5 - per DOJ/OIP
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FBI(19cv1278) 9524	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9525	b3; b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9527	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9528	b3; b5 - per DOJ/OIP; b7A
FBI(19cv1278) 9529	b3; b5 - per DOJ/OIP; b7A
FBI(19cv1278) 9530	b3; b5 - per DOJ/OIP; b7A
FBI(19cv1278) 9531	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9532	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9533	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9534	b3; b5 - per DOJ/OIP; b6; b7C; b7E
FBI(19cv1278) 9535	b3; b5 - per DOJ/OIP; b6; b7C; b7E
FBI(19cv1278) 9536	b3; b5 - per DOJ/OIP; b6; b7C; b7E
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FBI(19cv1278) 9538	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9539	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9540	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9541	b3; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9542	b3; b5 - per DOJ/OIP; b6; b7A; b7C
FBI(19cv1278) 9543	b3; b5 - per DOJ/OIP; b6; b7A; b7C
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FBI(19cv1278) 9545	b3; b7A
FBI(19cv1278) 9546	Duplicate
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FBI(19cv1278) 9555	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9556	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9557	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9558	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9559	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9560	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9561	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9562	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9563	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9564	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9565	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9566	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9567	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9568	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9569	b3; b5 - per DOJ/OIP; b7A; b7E

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FBI(19cv1278) 9570	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9571	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9572	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9573	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9574	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9575	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9576	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9577	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9578	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9579	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9580	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9581	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9582	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9583	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9584	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9585	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9586	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9587	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9588	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9589	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9590	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9591	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9592	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9593	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9594	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9595	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9596	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9597	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9598	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9599	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9600	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9601	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9602	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9603	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9604	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9605	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9606	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9607	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9608	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9609	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9610	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9611	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9612	b3; b5 - per DOJ/OIP; b7A; b7E

Bates Page Reference	Reason for Withholding (i.e., exemptions with coded rationale, duplicate, sealed by order of court, etc.)
FBI(19cv1278) 9613	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9614	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9615	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9616	Duplicate
FBI(19cv1278) 9617	Duplicate
FBI(19cv1278) 9618	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9619	Duplicate
FBI(19cv1278) 9620	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9621	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9622	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9623	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9624	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9625	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9626	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9627	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9628	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9629	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9630	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9631	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9632	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9633	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9634	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9635	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9636	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9637	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9638	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
FBI(19cv1278) 9639	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9640	b3; b5 - per DOJ/OIP; b7A; b7E
FBI(19cv1278) 9641	b3; b5 - per DOJ/OIP; b6; b7A; b7C; b7E
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FBI(19cv1278) 9646	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9647	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9648	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9649	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9650	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9651	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9652	b5 - per DOJ/OIP
FBI(19cv1278) 9653	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9654	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9655	b5 - per DOJ/OIP; b6; b7C

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FBI(19cv1278) 9656	b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9658	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9659	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9660	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9661	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9662	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9663	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9664	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9665	b5 - per DOJ/OIP
FBI(19cv1278) 9666	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9667	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9668	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9669	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9670	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9671	b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9674	b5 - per DOJ/OIP; b6; b7C
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Bates Page Reference	Reason for Withholding (i.e., exemptions with coded rationale, duplicate, sealed by order of court, etc.)
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FBI(19cv1278) 9717	Referral/Consult
FBI(19cv1278) 9718	Referral/Consult
FBI(19cv1278) 9719	Referral/Consult
FBI(19cv1278) 9720	Referral/Consult
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FBI(19cv1278) 9731	Referral/Consult
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Bates Page Reference	Reason for Withholding (i.e., exemptions with coded rationale, duplicate, sealed by order of court, etc.)
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FBI(19cv1278) 9745	b4; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9746	b4; b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9747	b4; b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9751	b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9755	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9756	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9757	b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9764	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9765	b5 - per DOJ/OIP; b6; b7C
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FBI(19cv1278) 9767	b5 - per DOJ/OIP; b6; b7C
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Bates Page Reference	Reason for Withholding (i.e., exemptions with coded rationale, duplicate, sealed by order of court, etc.)
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FBI(19cv1278) 9819	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9820	b5 - per DOJ/OIP; b6; b7C
FBI(19cv1278) 9821	b5 - per DOJ/OIP; b6; b7C
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Bates Page Reference	Reason for Withholding (i.e., exemptions with coded rationale, duplicate, sealed by order of court, etc.)
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U.S. Department of Justice
The Special Counsel's Office
Washington, D.C. 20530

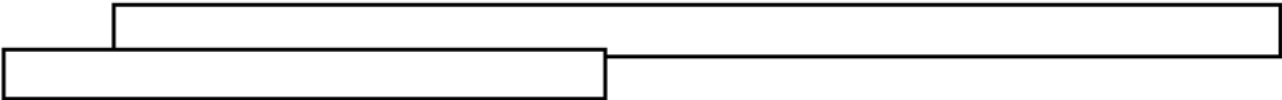
February 15, 2018



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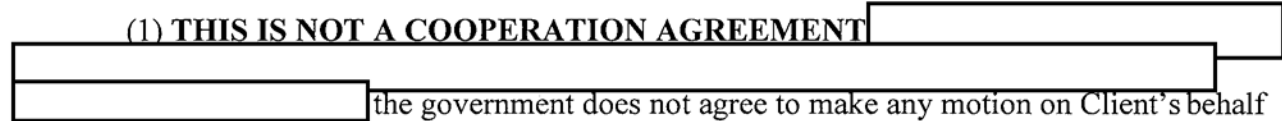
Re: Paul Saunders

Dear Counsel:



With respect to the meeting between the government, Client and yourselves on February 15, 2018 (hereinafter "the meeting"), the government will be represented by individuals from the Special Counsel's Office and the Federal Bureau of Investigation. The terms of this letter do not bind any office or component of the U.S. Department of Justice other than those identified in the preceding sentence. The following terms and conditions apply to the meeting:

(1) THIS IS NOT A COOPERATION AGREEMENT



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the government does not agree to make any motion on Client's behalf or to enter into a cooperation agreement, plea agreement, immunity agreement or non-prosecution agreement with Client. The government makes no representation about the likelihood that any such agreement will be reached in connection with this meeting.

(2) Should Client be prosecuted, no statements made by Client during the meeting will be used against Client in the government's case-in-chief at trial or for purposes of sentencing, except as provided below.

(3) The government may use any statement made or information provided by Client, or on Client's behalf, in a prosecution for false statements, perjury, or obstruction of justice, premised on statements or actions during the meeting. The government may also use any such statement or information at sentencing in support of an argument that Client failed to provide truthful or complete information during the meeting, and, accordingly: (a) that under the United States Sentencing Guidelines, Client is not entitled to a downward adjustment for acceptance of responsibility pursuant to Section 3E1.1, or should receive an upward adjustment for obstruction

of justice pursuant to Section 3C1.1; and (b) that Client's conduct at the meeting is a relevant factor under 18 U.S.C. § 3553(a).

(4) The government may make derivative use of any statements made or other information provided by Client during the meeting. Therefore, the government may pursue any investigative leads obtained directly or indirectly from such statements and information and may use the evidence or information subsequently obtained therefrom against Client in any manner and in any proceeding.

(5) In any proceeding, including sentencing, the government may use Client's statements and any information provided by Client during or in connection with the meeting to cross-examine Client, to rebut any evidence or arguments offered on Client's behalf, or to address any issues or questions raised by a court on its own initiative.

(6) Neither this agreement nor the meeting constitutes a plea discussion or an attempt to initiate plea discussions. In the event this agreement or the meeting is later construed to constitute a plea discussion or an attempt to initiate plea discussions, Client knowingly and voluntarily waives any right Client might have under Fed. R. Evid. 410, Fed. R. Crim. P. 11(f), or otherwise, to prohibit the use against Client of statements made or information provided during the meeting.

(7) The government reserves the right to argue that neither this agreement nor the meeting constitutes the timely provision of complete information to the government concerning Client's involvement in an offense, within the meaning of Section 3E1.1(b) of the Sentencing Guidelines.

(8) If and when required to do so by a court, the government may disclose to the Probation Office or the court any statements and information provided by Client during the meeting.

(9) The government may disclose the fact of the meeting or the information provided by Client during the meeting to the extent the government determines in its sole discretion that disclosure would be in furtherance of its discharge of its duties and responsibilities or is otherwise required by law. Such disclosure includes disclosure to a local, state, federal, or foreign government office or agency, including but not limited to another prosecutor's office, if the recipient of the information agrees to abide by the relevant terms of this agreement.

(10) The terms and conditions set forth in this agreement extend, if applicable, to the continuation of the meeting on the dates that appear below.

(11) It is understood that this agreement is limited to the statements made by Client at the meeting and does not apply to any oral, written or recorded statements made by Client at any other time.

(12) This document embodies the entirety of the agreement between the government and Client to provide information and evidence. No other promises, agreements or understandings

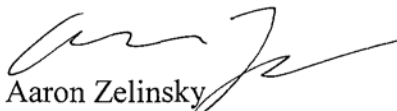
exist between Client and the government regarding Client's provision of information or evidence to the government.


(13) Client and Client's attorney acknowledge that they have read, fully discussed and understand every paragraph and clause in this document and the consequences thereof.

Dated: 2/15/2018

At: Washington DC

ROBERT S. MUELLER, III
Special Counsel

By: 
Aaron Zelinsky
Attorney
Special Counsel's Office


~~Richard [unclear]~~ Paul Saunders
[Redacted signature area]

Dates of Continuation

Initials of counsel, Client and government attorney

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b7c



U.S. Department of Justice
The Special Counsel's Office
Washington, D.C. 20530

March 7, 2018



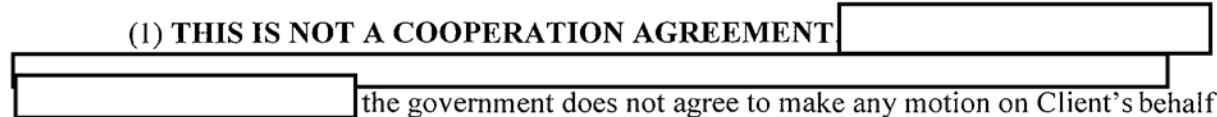
Re: Dimitri Simes

Dear Counsel:



With respect to the meeting between the government, Client and yourselves on March 7-8, 2018 (hereinafter "the meeting"), the government will be represented by individuals from the Special Counsel's Office and the Federal Bureau of Investigation. The terms of this letter do not bind any office or component of the U.S. Department of Justice other than those identified in the preceding sentence. The following terms and conditions apply to the meeting:

(1) THIS IS NOT A COOPERATION AGREEMENT



the government does not agree to make any motion on Client's behalf or to enter into a cooperation agreement, plea agreement, immunity agreement or non-prosecution agreement with Client. The government makes no representation about the likelihood that any such agreement will be reached in connection with this meeting.

(2) Should Client be prosecuted, no statements made by Client during the meeting will be used against Client in the government's case-in-chief at trial or for purposes of sentencing, except as provided below.

(3) The government may use any statement made or information provided by Client, or on Client's behalf, in a prosecution for false statements, perjury, or obstruction of justice, premised on statements or actions during the meeting. The government may also use any such statement or information at sentencing in support of an argument that Client failed to provide truthful or complete information during the meeting, and, accordingly: (a) that under the United States Sentencing Guidelines, Client is not entitled to a downward adjustment for acceptance of responsibility pursuant to Section 3E1.1, or should receive an upward adjustment for obstruction

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of justice pursuant to Section 3C1.1; and (b) that Client's conduct at the meeting is a relevant factor under 18 U.S.C. § 3553(a).

(4) The government may make derivative use of any statements made or other information provided by Client during the meeting. Therefore, the government may pursue any investigative leads obtained directly or indirectly from such statements and information and may use the evidence or information subsequently obtained therefrom against Client in any manner and in any proceeding.

(5) In any proceeding, including sentencing, the government may use Client's statements and any information provided by Client during or in connection with the meeting to cross-examine Client, to rebut any evidence or arguments offered on Client's behalf, or to address any issues or questions raised by a court on its own initiative.

(6) Neither this agreement nor the meeting constitutes a plea discussion or an attempt to initiate plea discussions. In the event this agreement or the meeting is later construed to constitute a plea discussion or an attempt to initiate plea discussions, Client knowingly and voluntarily waives any right Client might have under Fed. R. Evid. 410, Fed. R. Crim. P. 11(f), or otherwise, to prohibit the use against Client of statements made or information provided during the meeting.

(7) The government reserves the right to argue that neither this agreement nor the meeting constitutes the timely provision of complete information to the government concerning Client's involvement in an offense, within the meaning of Section 3E1.1(b) of the Sentencing Guidelines.

(8) If and when required to do so by a court, the government may disclose to the Probation Office or the court any statements and information provided by Client during the meeting.

(9) The government may disclose the fact of the meeting or the information provided by Client during the meeting to the extent the government determines in its sole discretion that disclosure would be in furtherance of its discharge of its duties and responsibilities or is otherwise required by law. Such disclosure includes disclosure to a local, state, federal, or foreign government office or agency, including but not limited to another prosecutor's office, if the recipient of the information agrees to abide by the relevant terms of this agreement.

(10) The terms and conditions set forth in this agreement extend, if applicable, to the continuation of the meeting on the dates that appear below.

(11) It is understood that this agreement is limited to the statements made by Client at the meeting and does not apply to any oral, written or recorded statements made by Client at any other time.

(12) This document embodies the entirety of the agreement between the government and Client to provide information and evidence. No other promises, agreements or understandings

