

WordPerfect Document Compare Summary

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Manafort.wpd

Deletions are shown with the following attributes and color:

~~Strikeout~~, **Blue** RGB(0,0,255).

Deleted text is shown as full text.

Insertions are shown with the following attributes and color:

Double Underline, **Redline**, **Red** RGB(255,0,0).

Moved blocks are marked in the new location, and only referenced in the old location.

Moved block marks are shown in the following color:

Orange RGB(255,200,0).

The document was marked with 63 Deletions, 60 Insertions, 2 Moves.

At all times relevant to this Superseding Indictment:

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1. Defendants PAUL J. MANAFORT, JR.; (MANAFORT) and RICHARD W. GATES III (GATESMANA FORT) served for years as a political consultants and lobbyists. Between at least 2006 and 2015, MANAFORT and GATES acted as unregistered agents of, through companies he ran, acted as an unregistered agent of a foreign government and foreign political parties. Specifically, he represented the Government of Ukraine, the President of Ukraine (Victor Yanukovych, who was President from 2010 to 2014), the Party of Regions (a Ukrainian political party whose leader Victor Yanukovych was President from 2010 to 2014), Yanukovych led by Yanukovych, and the Opposition Bloc (a successor to the Party of Regions that fanned in 2014 when after Yanukovych fled to Russia in 2014).

2. MANAFORT and GATES generated tens of millions of dollars in income as a result of their Ukraine work. In order to bide Ukraine payments from United States authorities, ~~From his Ukraine~~ work. From approximately 2006 through at least 2016, MANAFORT and GATES laundered the money through scores of United States and foreign corporations, partnerships, and bank accounts.

~~MANAFORT And GATES' Hiding Of Ukraine Lobbying And Public Relations Work~~

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inclusive, MANAFORT and GATES engaged in a multi-million dollar lobbying campaign in the United States at the direction of Yanukovych, the Party of Regions, and the Government of Ukraine. MANAFORT and GATES did so without registering and providing the disclosures required by law.

20. As part of the scheme, in February 2012, MANAFORT and GATES solicited two Washington, D.C., firms (Company A and Company B) to lobby in the United States on behalf of Yanukovych, the Party of Regions, and the Government of Ukraine. For instance, GATES wrote to Company A that it would be "representing the Government of Ukraine in [Washington, DC]." 21. MANAFORT repeatedly communicated in person and in writing with Yanukovych, and 15

Company B through a principal replied to GATES the same day that "there's a lot of email traffic that has you much more involved than this suggests[.] We will not disclose that but heaven knows what former employees of [Company B] or [Company A] might say." 25. In September 2016, after numerous recent press reports concerning MANAFORT, the Department of Justice informed MANAFORT, GATES, and DMI that it sought to determine whether they had acted as agents of a foreign principal under the Foreign Agents Registration Act (FARA), without registering. In November 2016 and February 2017, MANAFORT, GATES, and DMI caused false and misleading letters to be submitted to the Department of Justice, which mirrored the false cover story set out above. The letters, both of which were approved by MANAFORT and GATES before they were submitted, represented, among other things, that: • DMI's "efforts on behalf of the Party of Regions" "did not include meetings or outreach within the U.S.;" • MANAFORT and GATES did not "recall meeting with or conducting outreach to U.S.

government officials or U.S. media outlets on behalf of the [Centre], nor do they recall being party to, arranging, or facilitating any such communications. Rather, it is the recollection and understanding of Messrs.

Gates and Manafort that such communications would have been facilitated and conducted by the [Centre's] U.S. consultants, as directed by the [Centre]. ... "; • MANAFORT and GATES had merely served as a means of introduction of Company A and Company B to the Centre and provided the Centre with a list of "potential U.S.-based consultants-including [Company A] and [Company B]-for the [Centre's] reference and further consideration." f • DMI "does not retain communications beyond thirty days" and as a result of 18 this policy, a "search has returned no responsive documents." The November 2016 letter attached a one-page, undated document that purported to be a DMI .. Email Retention Policy." 26. In fact, MANAFORT and GATES had: selected Company A and Company B, engaged in weekly scheduled calls and frequent emails with Company A and Company B to provide them directions as to specific lobbying steps that should be taken, sought and received detailed oral and written reports from these firms on the lobbying work they had performed, communicated with Yanukovych to brief him on their lobbying efforts; both congratulated and reprimanded Company A and Company B on their lobbying work, communicated directly with United States officials in connection with this work; and paid the lobbying firms over \$2 million from offshorealong with others including Richard W. Gates III (Gates), engaged in a scheme to hide the Ukraine income from United States

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authorities, while enjoying the use of the money. From approximately 2006 to 2015, when MANAFORT was generating tens of millions of dollars in income from his Ukraine activities, MANAFORT, with the assistance of Gates, avoided paying taxes by disguising tens of millions of

dollars in income as alleged "loans" from nominee offshore corporate entities and by making millions of dollars in unreported payments from foreign accounts to bank accounts they controlled, among other things. In addition, court-authorized searches of MANAFORT and GATES' DMI email accounts and MANAFORT's Virginia residence in July 2017 revealed numerous documents, including documents related to lobbying, which were more than thirty days old at the time of the November 2016 letter to the Department of Justice.

MANAFORT And GATES Hiding Of Foreign Bank Accounts And False Filings

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28. First, the Bank Secrecy Act and its implementing regulations require United States citizens to report to the United States Treasury any financial interest in, or signatory authority over, any bank account or other financial account held in foreign countries, for every calendar year in which the aggregate balance of all such foreign accounts exceeds \$10,000 at any point during the year.

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entities noted above in paragraph 12 that bear the initials RG, as well as three other accounts in the United Kingdom. No FBAR reports were made by GATES for these accounts.

32. Furthermore, in each of MANAFORT's tax filings for 2008 through 2014, MANAFORT represented falsely that he did not have authority over any foreign bank accounts. MANAFORT and GATES had repeatedly and falsely represented in writing to MANAFORT's tax preparer that MANAFORT had no authority over foreign bank accounts, knowing that such false representations would result in false MANAFORT tax filings. For instance, on October 4, 2011,

~~MANAFORT's tax preparer asked MANAFORT in writing: "At any time during 2010, did you for your wife or children 1 have an interest in or a signature or other authority over a financial account in a foreign country, such as a bank account, securities account or other financial account?" On the same day, MANAFORT falsely responded "NO." MANAFORT responded the same way as recently as October 3, 2016, when MANAFORT's tax preparer again emailed the question in connection with the preparation of MANAFORT's tax returns: "Foreign bank accounts etc.?" MANAFORT responded on or about the same day: "NONE." MANAFORT And GATES' Fraud To Increase Access To Offshore Money 33. After MANAFORT used his and United States vendors. MANAFORT also used the offshore accounts to purchase real estate in the United States, he took out mortgages on the properties thereby allowing MANAFORT to have the benefits of liquid income and MANAFORT used the undisclosed income to make improvements to and refinance his United States properties.~~

~~3. In furtherance of the scheme, MANAFORT, with the assistance of Gates, funneled millions of dollars in payments into numerous foreign nominee companies and bank accounts, opened by them and their accomplices in nominee names and in various foreign countries, including Cyprus.~~

~~Saint Vincent & the Grenadines (Grenadines), and the Seychelles. MANAFORT concealed the existence and ownership of the foreign companies and bank accounts, falsely and repeatedly reporting to his tax preparers and to the United States that he had no foreign bank accounts.~~

~~4. In furtherance of the scheme, MANAFORT, with the assistance of Gates, concealed from the United States his work as an agent of, and millions of dollars in payments from, Ukraine and its political parties and leaders. Because MANAFORT, among other things, participated in a campaign to lobby United States officials on behalf of the Government of Ukraine, the President of Ukraine, and the Party of Regions, he was required by law to report to the United States his work and fees. MANAFORT did not do so. Instead, when the Department of Justice ~nt inquiries~~

~~to MANAFORT and Gates in 2016 about their activities, MANAFORT and Gates responded with a series of false and misleading statements.~~

~~5. In furtherance of the scheme, MANAFORT used his hidden overseas wealth to enjoy a~~

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~~lavish lifestyle in the United States, without paying taxes on it. Further, MANAFORT defrauded the banks that loaned him the money so that he could withdraw more money at a cheaper rate than he otherwise would have been permitted.~~

~~34. In 2012, MANAFORT, through a corporate vehicle called "MC Soho Holdings, LLC" owned by him and his family, bought a condominium on Howard Street in the Soho neighborhood 21 in Manhattan, New York. He paid approximately \$2,850,000. All the money used to purchase the condominium came from MANAFORT entities in Cyprus. MANAFORT used the property from at least January 2015 through 2016 as an income-generating rental property, charging thousands of dollars a week on Airbnb, among other places. In his tax returns, MANAFORT took advantage of the beneficial tax consequences of owning this rental property.~~

~~35. In late 2015 through early 2016, MANAFORT applied for a mortgage on the condominium. Because the bank would permit a greater loan amount if the property were owner-occupied, MANAFORT falsely represented to the bank and its agents that it was a secondary home used as~~

such by his daughter and son-in-law and was not a property held as a rental property. For instance, on January 26, 2016, MANAFORT wrote to his son-in-law to advise him that when the bank appraiser came to assess the condominium his son-in-law should "[r]emember, he believes that you and [MANAFORT's daughter] are living there." Based on a request from MANAFORT, GATES caused a document to be created which listed the Howard Street property as the second home of MANAFORT's daughter and son-in-law, when GATES knew this fact to be false. As a result of his false representations, in March 2016 the bank provided MANAFORT a loan for approximately \$3,185,000.

36. Also in 2012, MANAFORT -- through a corporate vehicle called "MC Brooklyn Holdings, LLC" similarly owned by him and his family -- bought a brownstone on Union Street in the Carroll Gardens section of Brooklyn, New York. He paid approximately \$3,000,000 in cash for the property. All of that money came from a MANAFORT entity in Cyprus. After purchase of the property, MANAFORT began renovations to transform it from a multi-family dwelling into a single family home. In late 2015 through early 2016, MANAFORT sought to borrow cash against the property. The institution MANAFORT went to for the loan provided greater loan amounts for 22 "construction loans" -- that is, loans that required the loan amounts to be used to pay solely for construction of the property and thus increase the value of the property serving as the loan's collateral. The institution would thus loan money against the expected completed value of the property, which in the case of the Union Street property was estimated to be \$8,000,000. In early 2016, MANAFORT was able to obtain a loan of approximately \$5,000,000, after promising the bank that approximately \$1,400,000 of the loan would be used solely for construction of the Union Street property. However, MANAFORT never intended to limit use of the proceeds to construction as required by the loan contracts. In December 2015, before the loan was made, MANAFORT wrote that income. MANAFORT, without reporting the income to his tax preparer, among others, that the construction loan "will allow me to pay back the [another Manafort apartment] mortgage in full. ... " Further, when the construction loan closed, MANAFORT used hundreds of thousands of dollars from the construction loan to make a down payment on or the United States, spent millions of dollars on luxury goods and services for himself and his extended family through payments wired from offshore nominee accounts to United States vendors. MANAFORT also used these offshore accounts to purchase multi-million dollar properties in the United States and to improve substantially another property in California.

Statutory Allegations COUNT ONE (Conspiracy Against The owned by his family.

6. In total, more than \$75,000,000 flowed through these offshore accounts. MANAFORT, with the assistance of Gates, laundered more than \$30,000,000, income that he concealed from the

United States.) 37. Paragraphs 1 through 30 and 32 through 36 are incorporated here.

38. From in or about and between Department of the Treasury (Treasury), the Department of Justice, and others.

Relevant Individuals And Entities

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

8. Gates was a United States citizen. He resided in Virginia.

9. In 2005, MANAFORT and another partner created Davis Manafort Partners, Inc. (DMP) to engage principally in political consulting. DMP had staff in the United States, Ukraine, and

Russia. In 2011, MANAFORT created DMP International, LLC (DMI) to engage in work for foreign clients, in particular political consulting, lobbying, and public relations for the Government

of Ukraine, the Party of Regions, and members of the Party of Regions. DMI was a partnership solely owned by MANAFORT and his spouse. Gates worked for both DMP and DMI and served as MANAFORT's right-hand man.

10. The Party of Regions was a pro-Russia political party in Ukraine. Beginning in approximately 2006, it retained MANA FORT, through DMP and then DMI, to advance its interests in Ukraine, the United States, and elsewhere, including the election of its Ukrainian slate

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of candidates. In 2010, its candidate for President, Yanukovych, was elected President of Ukraine.

In 2014, Yanukovych fled Ukraine for Russia in the wake of popular protests of widespread government corruption. Yanukovych, the Party of Regions, and the Government of Ukraine were MANAFORT, DMP, and DMI clients.

11. The European Centre for a Modern Ukraine (the Centre) was created in or about 2012 in Belgium as a mouthpiece for Yanukovych and the Party of Regions. It reported to the Ukraine First Vice Prime Minister. The Centre was used by MANA FORT, Gates, and others in order to lobby and conduct a public relations campaign in the United States and Europe on behalf of the existing Ukraine regime. The Centre effectively ceased to operate upon the downfall of Yanukovych in 2014.

12. MANA FORT, with the assistance of Gates, owned or controlled the following entities, which were used in the scheme (the MANAFORT entities):

Domestic Entities

-----r .-----. ----- Entity Name Incorporatio~J.;~~tiQ~{ .
/-----'--

Daisy Manafort. LLC (PM)

Davis Manafort International LLC
(PM)

DMP(PM)

Davis Manafort. Inc. (PM)

DMI (PM)

I.-) --a'-'t e C r ea ted + - . :1 "!' .

August 2008 Virginia

March 2011 Florida

March 2007 Delaware

March 2005 Virginia

March 2011 Florida

October 1999 Delaware

November 1999 Virginia

June 2011 Delaware

March 2012 Florida

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.C):prior Entities

~ --~ --" "----- ~~
" : ~e,~ ~

Entity Name Date Created Incorporation Location

Actinet Trading Limited (PM, RG) May 2009 Cyprus

Black Sea View Limited (PM, RG) August 2007 Cyprus

Bletilla Ventures Limited (PM, RG) October 2010 Cyprus

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Global Highway Limited (PM, RG) August 2007 Cyprus

Leviathan Advisors Limited (PM, RG) August 2007 Cyprus

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LOAV Advisors Limited (PM, RG) August 2007 Cyprus

Lucicle Consultants Limited (PM, RG) December 2008 Cyprus

Marziola Holdings Limited (PM) March 2012 Cyprus

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Entity Name Date Created

Olivenia Trading Limited (PM, RG) March 2012

Pcranova Holdings Limited (Peranova) June 2007

(PM, RG)

Scrangle Holdings Limited (PM, RG) January 2008

Yiakora Ventures Limited (PM) February 2008

Entity Name

Global Endeavour Inc. (also known

Global Endeavor Inc.) (PM)

Jeunet Ltd. (PM)

Pompolo Limited (PM, RG)

QJhcr Foreign Entities

----- . -

Date Created

--.~<~< ~" ~m M

as Unknown

.-f---

August 2011

April 2013

-- . --

Incorporation Location

Cyprus

Cyprus

Cyprus

Cyprus

Incorporation Location

Grenadines

Grenadines

United Kingdom

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

The Scheme

14. Between in or around 2006 and 2017, both dates being approximate and inclusive, in the District of Columbia and elsewhere, ~~the defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III, together with others, knowingly and intentionally conspired to defraud~~ MANAFORT and others devised and intended to devise, and executed and attempted to execute, a scheme and artifice to defraud, and to obtain money and property by means of false and fTaudulent pretenses, representations, and promises from the United

States by impeding, impairing, obstructing, and defeating the lawful governmental functions of a government agency, namely and others. As part of the scheme, MANAFORT repeatedly provided and caused to be

provided false infonnation to financial bookkeepers, tax accountants, and legal counsel, among others.

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

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

Payee

Transaction Originating Account Country of Amount of

Date Holder Origination Transaction

Vendor A 6/10/2008 LOA V Advisors Limited Cyprus \$107,000

(Home 6/25/2008 LOA V Advisors Limited Cyprus \$23,500

Improvement 7/7/2008 LOA V Advisors Limited Cyprus \$20,000

Company in the 8/5/2008 Yiakora Ventures Limited Cyprus \$59,000

Hamptons, New 9/2/2008 Yiakora Ventures Limited Cyprus \$272,000

York) 10/6/2008 Yiakora Ventures Limited Cyprus \$109,000

10/24/2008 Yiakora Ventures Limited Cyprus \$107,800

11/12/2008 Yiakora Ventures Limited Cyprus \$77,400

12/22/2008 Yiakora VentW'cs Limited Cyprus \$100,000

1/14/2009 Yiakora Ventures Limited Cyprus \$9,250

1/29/2009 Yiakora Ventures Limited Cyprus \$97,670

2/25/2009 Yiakora Ventures Limited Cyprus \$108,100

4/16/2009 Yiakora V cntures Limited Cyprus \$94,394

5/7/2009 Yiakora Ventures Limited Cyprus \$54,000

5/12/2009 Yiakora Ventures Limited Cyprus \$9,550

6/11/2009 Yiakora Ventures Limited Cyprus \$86,650
6/18/2009 Yiakora Ventures Limited Cyprus \$34,400
7/31/2009 Yiakora Ventures Limited Cyprus \$106,000
8/28/2009 Yiakora Ventures Limited Cyprus \$37,000
9/23/2009 Yiakora Ventures Limited Cyprus \$203,500
10/26/2009 Yiakora Ventures Limited Cyprus \$38,800

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Payee

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

7/9/2012 Lucicle Consultants Limited Cyprus \$10,800
7118/2012 Lucicle Consultants Limited Cyprus \$88,000
81712012 Lucicle Consultants Limited Cyprus \$48,800

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Payee

Transaction Originating Account Country of Amount of
Date Holder Origination Transaction
9/27/2012 Lucicle Consultants Limited Cyprus \$100,000
11120/2012 Lucicle Consultants Limited Cyprus \$298,000
12/20/2012 Lucicle Consultants Limited Cyprus \$55,000
112912013 Lucicle Consultants Limited Cyprus \$149,000
3112/2013 Lucicle Consultants Limited Cyprus \$375,000
8/29/2013 Global Endeavour Inc. Grenadines \$200,000
11113/2013 Global Endeavour Inc. Grenadines \$75,000
11/26/2013 Global Endeavour Inc. Grenadines \$80,000
12/6/2013 Global Endeavour Inc. Grenadines \$130,000
12/12/2013 Global Endeavour Inc. Grenadines \$90,000
4/22/2014 Global Endeavour Inc. Grenadines \$56,293
8118/2014 Global Endeavour Inc. Grenadines \$34,660

Vendor A Total \$5,434,793

Vendor B 3/22/2011 Leviathan Advisors Limited Cyprus \$12,000
(Home 3/28/2011 Leviathan Advisors Limited Cyprus \$25,000
Automation, 4/27/2011 Leviathan Advisors Limited Cyprus \$12,000
Lighting, and 5/16/2011 Leviathan Advisors Limited Cyprus \$25,000
Home 11115/2011 Global Highway Limited Cyprus \$17,006
Entertainment 11123/2011 Global Highway Limited Cyprus \$11,000
Company in 2/28/2012 Global Highway Limited Cyprus \$6,200

Florida)

10/31/2012 Lucicle Consultants Limited Cyprus \$290,000
12/17/2012 Lucicle Consultants Limited Cyprus \$160,600
1115/2013 Lucicle Consultants Limited Cyprus \$194,000
1/24/2013 Lucicle Consultants Limited Cyprus \$6,300
2112/2013 Lucicle Consultants Limited Cyprus \$51,600
2126/2013 Lucicle Consultants Limited Cyprus \$260,000

7115/2013 Pompolo Limited

United

\$175,575

Kingdom

1115/2013 Global Endeavour Inc. Grenadines \$73,000

Vendor B Total \$1,319,281

VendorC 10/7/2008 Yiakora Ventures Limited Cyprus \$15,750
(Antique Rug 311712009 Yiakora Ventures Limited Cyprus \$46,200
Store in 4/16/2009 Yiakora Ventures Limited Cyprus \$7,400
Alexandria, 4/27/2009 Yiakora Ventures Limited Cyprus \$65,000
Virginia) 517/2009 Yiakora Ventures Limited Cyprus \$210,000

7115/2009 Yiakora Ventures Limited Cyprus \$200,000
3/31/2010 Yiakora Ventures Limited Cyprus \$140,000
611612010 Global Highway Limited Cyprus \$250,000

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Qayee Transaction Originating Account Country of Amount of
Date Holder Origination Transaction

Vendor C Total \$934,350

Vendor D

(Related to 2/28/2012 Global J lighway Limited Cyprus \$100,000

Vendor C)

Vendor D Total \$100,000

Vendor E 111712008 Yiakora Ventures Limited Cyprus \$32,000
(Men's Clothing 2/5/2009 Yiakora Ventures Limited Cyprus \$22,750
Store in New 4/27/2009 Yiakora Ventures Limited Cyprus \$13,500
York))0/26/2009 Yiakora Ventures Limited Cyprus \$32,500

3/30/2010 Yiakora Ventures Limited Cyprus \$15,000

5/1112010 Global Highway Limited Cyprus \$39,000

6/28/2010 Leviathan Advisors Limited Cyprus \$5,000

8/12/2010 Leviathan Advisors Limited Cyprus \$32,500

11117/2010 Global Highway Limited Cyprus \$11,500

217/2011 Global Highway Limited Cyprus \$24,000

3/22/2011 Leviathan Advisors Limited Cyprus \$43,600

3/2812011 Leviathan Advisors Limited Cyprus \$12,000

4/27/2011 Leviathan Advisors Limited Cyprus \$3,000

6/30/2011 Global Highway Limited Cyprus \$24,500

9/26/2011 Leviathan Advisors Limited Cyprus \$12,000

1112/2011 Global Highway Limited Cyprus \$26,700

12/12/2011 Leviathan Advisors Limited Cyprus \$46,000

2/9/2012 Global Highway Limited Cyprus \$2,800

2/28/2012 Global Highway Limited Cyprus \$16,000

3/14/2012 Lucicle Consultants Limited Cyprus \$8,000

4/18/2012 Lucicle Consultants Limited Cyprus \$48,550

5/15/2012 Lucicle Consultants Limited Cyprus \$7,000

6/19/2012 Lucicle Consultants Limited Cyprus \$21,600

817/2012 Lucicle Consultants Limited Cyprus \$15,500

11120/2012 Lucicle Consultants Limited Cyprus \$10,900

12/20/2012 Lucicle Consultants Limited Cyprus \$7,500

1115/2013 Lucicle Consultants Limited Cyprus \$37,000

2112/2013 Lucicle Consultants Limited Cyprus \$7,000

2/26/2013 Lucicle Consultants Limited Cyprus \$39,000

9/312013 Global Endeavour Inc. Grenadines \$81,500

10115/2013 Global Endeavour Inc. Grenadines \$53,000

11/26/2013 Global Endeavour Inc. Grenadines \$13,200

4/24/2014 Global Endeavour Inc. Grenadines \$26,680

10

Payee

Transaction Originating Account Country of Amount of

Date Holder Origination Transaction

911112014 Global Endeavour Inc. Grenadines \$58,435

Vendor E Total \$849,215

VcndorF 4/27/2009 Yiakora Ventures Limited Cyprus \$34,000

(Landscaper in 5/12/2009 Yiakora Ventures Limited Cyprus \$45,700

the Hamptons, 6/1/2009 Yiakora Ventures Limited Cyprus \$21,500

New York) 6/18/2009 Yiakora Ventures Limited Cyprus \$29,000

9121/2009 Yiakora Ventures Limited Cyprus \$21,800

5/1112010 Global Highway Limited Cyprus \$44,000

6/28/2010 Leviathan Advisors Limited Cyprus \$50,000

7/23/2010 Leviathan Advisors Limited Cyprus \$19,000

9/212010 Yiakora Ventures Limited Cyprus \$21,000

10/6/2010 Global Highway Limited Cyprus \$57,700

10118/2010 Leviathan Advisors Limited Cyprus \$26,000

12/1612010 Global Highway Limited Cyprus \$20,000

3/22/2011 Leviathan Advisors Limited Cyprus \$50,000

5/3/2011 Global Highway Limited Cyprus \$40,000

6/1/2011 Leviathan Advisors Limited Cyprus \$44,000

7/27/2011 Leviathan Advisors Limited Cyprus \$27,000

8/16/2011 Leviathan Advisors Limited Cyprus \$13,450

9/19/2011 Leviathan Advisors Limited Cyprus \$12,000

10/24/2011 Global Highway Limited Cyprus \$42,000

1112/2011 Global Highway Limited Cyprus \$37,350

Vendor F Total \$655,500

VendorG 9/2/2010 Yiakora Ventures Limited Cyprus \$165,000

(Antique Dealer 10118/2010 Leviathan Advisors Limited Cyprus \$165,000

in New York) 2/28/2012 Global Highway Limited Cyprus \$190,600

3/14/2012 Lucicle Consultants Limited Cyprus \$75,000

2/2612013 Lucicle Consultants Limited Cyprus \$28.310

Vendor G Total \$623,910

VendorH 6/2512008 LOA V Advisors Limited Cyprus \$52,000

(Clothing Store in 12/1612008 Yiakora Ventures Limited Cyprus \$49,000

Beverly Hills, 12/22/2008 Yiakora Ventures Limited Cyprus \$10,260

California) 8112/2009 Yiakora Ventures Limited Cyprus \$76,400

5/1112010 Global Highway Limited Cyprus \$85,000

11117/2010 Global Highway Limited Cyprus \$128,280

5/3112011 Leviathan Advisors Limited Cyprus \$64,000

11115/2011 Global Highway Limited Cyprus \$48,000

12117/2012 Lucicle Consultants Limited Cyprus \$7,500

11

nate Holder Origination Transaction

Vendor H Total \$520,440

Vendor I

(Investment 9/3/2013 Global Endeavour Inc. Grenadines \$500,000
Company)

Vendor I Total 5500,000

Vendor J 11115/2011 Global Highway Limited Cyprus \$8,000
(Contractor in 12/5/2011 Leviathan Advisors Limited Cyprus \$11,237
Florida) 12/2112011 Black Sea View Limited Cyprus \$20,000

2/9/2012 Global Highway Limited Cyprus \$51,000

5/17/2012 Lucicle Consultants Limited Cyprus \$68,000

6/19/2012 Lucicle Consultants Limited Cyprus \$60,000

7/18/2012 Lucicle Consultants Limited Cyprus \$32,250

9/19/2012 Lucicle Consultants Limited Cyprus \$112,000

1113012012 Lucicle Consultants Limited Cyprus \$39,700

119/2013 Lucicle Consultants Limited Cyprus \$25,600

2/28/2013 Lucicle Consultants Limited Cyprus \$4,700

Vendor J Total \$432,487

VendorK 12/5/2011 Leviathan Advisors Limited Cyprus \$4,115
(Landscaper in 3/112012 Global Highway Limited Cyprus \$50,000
the Hamptons, 6/6/2012 Lucicle Consultants Limited Cyprus \$47,800
New York) 6/25/2012 Lucicle Consultants Limited Cyprus \$17,900

6/2712012 Lucicle Consultants Limited Cyprus \$18,900

2/12/2013 Lucicle Consultants Limited Cyprus \$3,300

7/15/2013 Pompolo Limited

United

\$13,325

Kingdom

1112612013 Global Endeavour Inc. Grenadines \$9,400

Vendor K Total \$164,740

VendorL 4112/2012 Lucicle Consultants Limited Cyprus \$83,525

(Payments 5/2/2012 Lucicle Consultants Limited Cyprus \$12,525

Relating to Three

Range Rovers) 6129/2012 Lucicle Consultants Limited Cyprus \$67,655

Vendor L Total 5163,705

VendorM 11/2012012 Lucicle Consultants Limited Cyprus \$45,000

(Contractor in 1217/2012 Lucicle Consultants Limited Cyprus \$21,000

Virginia) 12117/2012 Lucicle Consultants Limited Cyprus \$21,000

1/17/2013 Lucicle Consultants Limited Cyprus \$18,750

1129/2013 Lucicle Consultants Limited Cyprus \$9,400

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Payee

Transaction Originating Account Country of Amount of

Date Holder Origination Transaction

211212013 Lucicle Consultants Limited Cyprus \$10,500

Vendor M Total \$125,650

Vendor N 112912009 Yiakora Ventures Limited Cyprus \$10,000

(Audio, Video, 311712009 Yiakora Ventures Limited Cyprus \$21,725

and Control 4/16/2009 Yiakora Ventures Limited Cyprus \$24,650

System Home 12/2/2009 Global Highway Limited Cyprus \$10,000

Integration and 3/8/2010 Global Highway Limited Cyprus \$20,300

Installation 4/23/2010 Yiakora Ventures Limited Cyprus \$8,500

Company in the

Hamptons, New

7/2912010 Leviathan Advisors Limited Cyprus \$17,650

York)

Vendor N Total \$112,825

Vendor 0

(Purchase of

10/5/2012 Lucicle Consultants Limited Cyprus \$62,750

Mercedes Benz)

Vendor 0 Total \$62,750

VendorP

(Purchase of 12/30/2008 Yiakora Ventures Limited Cyprus \$47,000

Range Rover)

Vendor P Total \$47,000

VendorQ 9/2/2010 Yiakora Ventures Limited Cyprus \$10,000

(Property 10/6/2010 Global Highway Limited Cyprus \$10,000

Management 10118/2010 Leviathan Advisors Limited Cyprus 510,000

Company in 2/8/2011 Global Highway Limited Cyprus \$13,500

South Carolina)

2/9/2012 Global Highway Limited Cyprus \$2,500

Vendor Q Total \$46,000

VendorR 2/9/2011 Global Highway Limited Cyprus \$17,900

(Art Gallery in

Florida) 2/14/2013 Lucicle Consultants Limited Cyprus \$14,000

Vendor R Total \$31,900

VendorS 9126/2011 Leviathan Advisors Limited Cyprus \$5,000

(Housekeeping in 9/19/2012 Lueicle Consultants Limited Cyprus \$5,000

New York)

10/9/2013 Global Endeavour Inc. Grenadines \$10,000

Vendor S Total 520,000

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

-----~-----~" - -----~-----~ . - " - --~

Property

Payee Date

Originating Country of

Amount

Purchased Account Origin

Howard Street OMP

Condominium International 2/112012 Peranova Cyprus \$1,500,000

(New York) IJ..C

f-----

Union Street

Attorney 11129/2012 Actinet Trading

Cyprus \$1,800,000

Account Of Limited

Brownstone, ~ -----, ----- ----- ~

(New York)

[Real Estate 1112912012 Actinet Trading

Cyprus \$1,200,000

Attorneyl Limited ----

Arlington

Real Estate Lucicle Consultants

House

Trust

8/31/2012

Limited

Cyprus \$1,900,000

(Virginia)

Total \$6,400,000

18. MANAFORT also disguised, as purported "loans," more than \$10 million from Cypriot entities, including the overseas MANAFORT entities, to domestic entities owned by MANAFORT. For example, a \$1.5 million wire from Peranova to OM! that MANAFORT used to purchase real estate on Howard Street in Manhattan, New York, was recorded as a "loan" from

Peranova to DM!, rather than as income. The following loans were shams designed to reduce fraudulently MANAFORT's reported taxable income.

Year Payor 1 Ostensi ble Payee I Ostensible Country of Total Amount

-----f----- .. -----" --L-e--n-d-e-r-- --

2008 Yiakora Ventures L

----- - "Borrower" Q rigin of "Loans" -.~ --,-----

imited Jesand Investment Cyprus \$8,120,000

. - ~ ~ "" --

2008 Yiakora Ventures L

--"~

---- C0!1?0ration -----

imited OMP C~Erus \$500,000

-- 2009 Yiakora Ventures L imited DMP Cyprus \$694,000

2009 Yiako"r,a- V.e"n-tu--re-s L . - i m. it-e-d- p aisy Manafort, L~L gl:1?rus ---

~ ~.QO, 9.QQ

2012 Peranova ----- DM! f~ .. ~ 1.5Q~t90~ ~ ----- --

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2014

2015

Total

Telmar Investments Ltd.

~~ "---

Telmar Investments Ltd.

DMI

DMI

~2Qg1.900

\$1,000,000

\$13.2] 4,000

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189. It is illegal to act as an agent of a foreign principal engaged in certain United States influence

activities without registering the affiliation. Specifically, a person who engages in lobbying or public relations work in the United States (hereafter collectively referred to as lobbying) for a foreign principal, such as the Government of Ukraine or the Party of Regions, is required to provide

a detailed written registration statement to the United States Department of Justice. The filing, made under oath, must disclose the name of the foreign principal, the financial payments to the lobbyist, and the measures undertaken for the foreign principal, among other information. A person required to make such a filing must further make include in all lobbying material a "conspicuous

statement" that the materials are distributed on behalf of the foreign principal, among other things.

The filing thus permits penn its public awareness and evaluation of the activities of a lobbyist who acts as

an agent of a foreign power or foreign political party in the United States.

1920. In furtherance of the scheme, from 2006 until 2014, both dates being approximate and

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inclusive, MANAFORT, with the assistance of Oates and others, engaged in a multi-million dollar

lobbying campaign in the United States at the direction of Yanukovych, the Party of Regions, and the Government of Ukraine. MANAFORT did so without registering and providing the disclosures required by law.

21. As one part of the scheme, in February 2012, MANAFORT, with the assistance of Gates, solicited two Washington, D.C., firms (Company A and Company B) to lobby in the United States

on behalf of Yanukovych, the Party of Regions, and the Government of Ukraine. For instance,

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Gates wrote to Company A that it would be "representing the Government of Ukraine In [Washington,] DC."

22. MANAFORT repeatedly communicated in person and in writing with Yanukovych, and Gates passed on directions to Company A and Company B. For instance, MANA FORT wrote Yanukovych a memorandum dated April 8, 2012, in which bc provided Yanukovych an update on

the lobbying firms' activities "since the inception of the project a few weeks ago. It is my intention

to provide you with a weekly update moving forward." Toward the end of that first year, in November 2012, Gates wrote to Company A and Company B that the firms needed to prepare an assessment of their past and prospective lobbying efforts so the "President" could be briefed by "Paul" "on what Ukraine has done well and what it can do better as we move into 2013."

23. At the direction of MANAFORT and Gates, Company A and Company B engaged in extensive lobbying. Among other things, they lobbied multiple Members of Congress and their staffs about Ukraine sanctions, the validity of Ukraine elections, and the propriety of Yanukovych's imprisoning his presidential rival, Yulia Tymoshenko. In addition, with the assistance of Company A, MANAFORT directly lobbied a Member of Congress who had Ukraine

within his subcommittee's purview, and reported that lobbying effort to senior Government of Ukraine leadership.

24. To minimize public disclosure of their lobbying campaign and distance their work from the Government of Ukraine, MANAFORT, Gates, and others arranged for the Centre to be the nominal

client of Company A and Company B, even though in fact the Centre was under the ultimate direction of the Government of Ukraine, Yanukovych, and the Party of Regions, and reported to the First Vice Prime Minister. For instance, MANA FORT and Gates selected Company A and Company B, and only thereafter did the Centre sign contracts with the lobbying firms without ever

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meeting either company. Company A and Company I3 were paid for their services not by their nominal client, the Centre, but solely through off.c;hore accounts associated with the MANAFORT

entities, namely Bletilla Ventures Limited (in Cyprus) and Jeunet Ltd. and Global Endeavour Inc.

(in Grenadines). In total, Company A and Company I3 were paid more than \$2 million from these

accounts between :201:1 and :JU 14. Indeed, various employees of Company A and Company B viewed the Centre ac; a fig leaf. As a Company A employee noted to another employee: Gates was

lobbying for the Centre "in name only. [Y]ou've gotta see through the nonsense of that[.]"

25. Neither Company A nor Company B registered as required with the United States Department of Justice. In order to avoid such registration, Gates provided the companies a false and misleading signed statement from the Centre, stating that it was not "directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in part by a government of a foreign country or a foreign political party." In fact, the Centre took direction from Yanukovych and the Ukraine First Vice Prime Minister.

26. To conceal the scheme, MANAFORT and Gates developed a false and misleading cover

story that would distance themselves and the Government of Ukraine, Yanukovych, and the Party

of Regions from the Centre, Company A, and Company B. For instance, in the wake of extensive press reports on MANAFORT and his connections with Ukraine, on August 16, 2016, Gates communicated false and misleading talking points to Company B in writing, including:

- Q: "Can you describe your initial contact with [Company BJ and the lobbying goals he discussed with them?" A: "We provided an introduction between the [Centre] and [Company B/Company A] in 2012. The [Centre] was seeking to retain representation in Washington, DC to support the mission of the NOO."
- A: "Our [MANAFORT and Gates'] task was to assist the [Centre to] find

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representation in Washington, but at no time did our firm or members provide any direct lobbying support."

- A: "The structure of the arrangement between the [Centre] and [Company A I Company B] was worked out by the two parties."
- Q: "Can you say where the funding from for [sic] the [Ccntre] came from? (this amounted to well over a million dollars between 2012 and 2014)." A: "This is a question better asked of the [Centrel who contracted with the two firms.]
- Q: "Can you describe the lobbying work specifically undertaken by [Company B] on behalf of the Party of Rcgions/the [Centre]?" A: "This is a question better asked to [Company B] andlor the [Centre] as the agreement was between the parties. Our firm did not play a role in the structure, nor were we registered lobbyists."

Company B through a principal replied to Gates the same day that "there's a lot of email traffic that has you much more involved than this suggests[.] We will not disclose that but heaven knows

what former employees of [Company BJ or [Company A] might say."

27. In September 2016, after numerous recent press reports concerning MANAFORT, the Department of Justice and informed MANAFORT, Gates, and DMI that it sought to determine whether

they had acted as agents of a foreign principal under the Foreign Agents Registration Act (FARA),

without registering. In November 2016 and February 2017, MANAFORT, Gates, and DMI caused

false and misleading letters to be submitted to the Department of the Treasury, and to commit offenses against Justice, which mirrored the false

cover story set out above. The letters, both of which were approved by MANAFORT and Gates before they were submitted, represented, among other things, that:

- DMI's "efforts on behalf of the Party of Regions" "did not include meetings or outreach within the U.S.:"

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- MANAFORT and Gates did not "recall meeting with or conducting outreach to U.S. government officials or U.S. media outlets on behalf of the [Centre], nor do they recall being party to, arranging, or facilitating any such communications. Rather, it is the recollection and understanding of Messrs.

Gates and Manafort that such communications would have been facilitated and conducted by the [Centre's] U.S. consultants, as directed by the [Centre] ";

• MANAFORT and Gates had merely served as a means of introduction of Company A and Company B to the Centre and provided the Centre with a list of "potential U.S.-based consultants-including rCompany A] and [Company B]-for the [Centre's] reference and further consideration."

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

28. In fact, MANAFORT and Gates had: selected Company A and Company B; engaged in weekly scheduled calls and frequent e-mails with Company A and Company B to provide them directions as to specific lobbying steps that should be taken; sought and received detailed oral and

written reports from these firms on the lobbying work they had performed; communicated with Yanukovych to brief him on their lobbying efforts; both congratulated and reprimanded Company

A and Company B on their lobbying work; communicated directly with United States officials in connection with this work; and paid the lobbying firms over \$2 million from offshore accounts they controlled, among other things. In addition, court-authorized searches of MANAFORT and Gates' DMI email accounts in 2017 and a search of MANA FORT's Virginia residence in July 19

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2017 revealed numerous documents, including documents related to lobbying, which were more than thirty-days old at the time of the November 2016 letter to the Department of Justice.

29. As a second part of the lobbying scheme, in 2012, MANAFORT, with the assistance of Gates, on behalf of Yanukovych and the Government of Ukraine's Ministry of Justice, retained a United States law firm to write a report on the trial of Tymoshenko, among other things. The treatment of Tymoshenko was condemned by the United States, to wit, the violations of law charged 23 in Counts Three through Six and Ten through Twelve.

39. In furtherance of the conspiracy and to effect its illegal object, MANAFORT and GATES committed the overt acts noted in Count Eleven and the overt acts, among others, in the District of Columbia and elsewhere as set forth in paragraphs 9, 16, 17, 20-25, 32, and 34-36, which are incorporated herein:

(18 U.S.C. § 371) COUNT TWO (Conspiracy To Launder Money) 40 and was viewed as a major hurdle

to normalization of relations with Ukraine. MANAFORT and Gates used one of their offshore accounts to funnel \$4 million to pay for the report, a fact that was not disclosed in the report or to

the public. They also retained a public relations firm (Company C) to create and implement a rollout

plan for the report. MANAFORT and Gates again secretly used one of their offshore accounts to pay Company C, funneling the equivalent of more than \$1 million to pay for the work. MANAFORT, Gates, and their conspirators developed detailed written lobbying plans in connection with the dissemination of the law firm's report, including outreach to United States politicians and press. MANAFORT reported on the law firm's work and the lobbying plan to

representatives of the Government of Ukraine, including President Yanukovych. For instance, a July 27, 2012, memorandum from MANAFORT noted: "[t]his document will address the global rollout strategy for the [law firm's] legal report, and provide a detailed plan of action[]." The plans

included lobbying in the United States.

30. As a third part of the lobbying scheme, in or about 2012, MANAFORT, with the assistance of Gates, on behalf of Yanukovych and the Party of Regions, secretly retained a group of former senior European politicians to take positions favorable to Ukraine, including by lobbying in the United States. Although the former politicians would appear to be providing their independent assessments of Government of Ukraine actions, in fact they were paid lobbyists for Ukraine. In

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2012 and 2013, MANAFORT used at least four offshore accounts to wire more than 2 million euros to pay the group of former politicians.

31. MANAFORT explained in an "EYES ONLY" memorandum created in or about June 2012 that the purpose of the "SUPER VIP" effort would be to "assemble a small group of high-level European highly influential [sic] champions and politically credible friends who can act informally and without any visible relationship with the Government of Ukraine." The group was managed by a former European Chancellor, Foreign Politician A, in coordination with MANAFORT. As explained by MANAFORT, a nongovernmental agency would be created to retain this group, but it would act "at our quiet direction." In or about 2013, Foreign Politician A and other former politicians from the group lobbied United States Members of Congress, officials

in the Executive Branch, and their staffs in coordination with MANAFORT, Gates, Company A, and Company B.

MANAFORT's Hiding Foreign Bank Accounts And False Filings

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2732. United States citizens who have authority over certain foreign bank accounts-- whether accounts-whether or not the accounts are set up in the names of nominees who act for their principals -- have principals-have reporting obligations to the United States.

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33. United States citizens'are obligated to report information to the IRS regarding foreign bank accounts. For instance, in 2010, Schedule B of IRS Form 1040 had a "Yes" or "No" box to record

an answer to the question: "At any time during [the calendar year], did you have an interest in or a signature or other authority over a financial account in a foreign country, such as a bank account,

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

34. In each of MANAFORT's tax filings for 2008 through 2014, MANAFORT, with the

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assistance of Gates, represented falsely that he did not have authority over any foreign bank

accounts. MANAFORT and Gates had repeatedly and falsely represented in writing to MANAFORT's tax preparer that MANA FORT had no authority over foreign bank accounts, knowing that such false representations would result in false tax filings in MANAFORT's name. For instance, on October 4, :WII, MANAFORT's tax preparer asked MANAFORT in writing:

"At

any time during 2010, did you (or your wife or children] have an interest in or a signature or other

authority over a financial account in a foreign country, such as a bank account, securities account or other financial account?" On the same day, MANAFORT falsely responded "NO."

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

Statutory Allegations

COUNT ONE

(Conspiracy Against The United States)

35. Paragraphs 1 through 30 and 32 through 36 are incorporated here.

4136. ~~From~~ in or ~~around~~about and between 2006 and 2016, both dates being approximate and inclusive, ~~within~~,

in the District of Columbia and elsewhere, the defendants PAUL J. MANAFORT, JR., and RICHARD W. GATES III together

with others, including Gates, knowingly and intentionally conspired to defraud the United States by impeding, impairing, obstructing, and defeating the lawful governmental functions of a government agency, namely the Department of Justice and the Treasury, and to commit offenses against the United States, to wit, the violations of law charged in Counts Three, Four, and Five.

37. In furtherance of the conspiracy and to effect its illegal object, MANA FORT and his

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conspirators committed the overt acts noted in Count Four and the overt acts, among others, in the

District of Columbia and elsewhere, set forth in paragraphs 9,16-18,21--31, and 34, which are incorporated herein.

(18 U.S.C. § 371)

COUNT TWO

(Conspiracy To Launder Money)

38. Paragraphs 1 through 34 are incorporated here.

39. In or around and between 2006 and 2016, both dates being approximate and inclusive, within the District of Columbia and elsewhere, the defendant PAUL J. MANAFORT, JR., together

with others, including Gates, did knowingly and intentionally conspire to:

(a) transport, transmit, and transfer monetary instruments and funds from places outside the United States to and through places in the United States and from places in the United States to and through places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit: a felony violation of the FARA, in violation

of Title 22, United States Code, Sections 612 and 618 (the "Specified Unlawful Activity"),

contrary to Title 18, United States Code, Section 1956(a)(2)(A); and
(b) conduct financial transactions, affecting interstate and foreign commerce, knowing that the property involved in the financial transactions would represent the proceeds of some form of unlawful activity,²³ and the transactions in fact would involve the proceeds of the Specified Unlawful Activity, knowing that such financial transactions were designed in whole and in part (i) to engage in conduct constituting a violation of sections 7201 and 24

7206 of the Internal Revenue Code of 1986, and (ii) to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the Specified Unlawful Activity,
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Activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(ii) and
1956(a)(1)(B)(i).

(18 U.S.C. § 1956(h))

COUNT THREE

(Unregistered Agent Of A Foreign Principal)

40. Paragraphs 1 through 34 are incorporated here.

41. From in or about and between 2008 and 2014, both dates being approximate and inclusive, within the District of Columbia and elsewhere, the defendant PAUL J. MANAFORT, JR., knowingly and willfully acted as an agent of a foreign principal, and caused and aided and abetted

Companies A, B, and C, and others, including former senior foreign politicians, to act as agents of a foreign principal, to wit, the Government of Ukraine, the Party of Regions, and Yanukovych, without registering with the Attorney General as required by law.

(22 U.S.C. §§ 612 and 618(a)(1); 18 U.S.C. § 2)

COUNT FOUR

(False and Misleading FARA Statements)

42. Paragraphs 1 through 34 are incorporated here.

43. On or about November 23, 2016, and February 10, 2017, within the District of Columbia and elsewhere, the defendant PAUL J. MANAFORT, JR., knowingly and willfully caused to be made a false statement of a material fact, and omitted a material fact necessary to make the statements therein not misleading, in a document filed with and furnished to the Attorney General

under the provisions of FARA, to wit, the underlined statements:

• "[D]MI1's efforts on behalf of the Party of Regions and Opposition Bloc did not include meetings or outreach within the U.S."

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• "[N]cilher IUMllnOf Messrs. Manafort or Gates had .UIY agrccment with lhl: L~'to;l!~r~ll,(ll1f()vil!e;,:.-'it.!rvjc~s."

• "[D]MII did provide th~LC~IJ1I~CJ, at the request of members of the Party of Regions,

with a list of potential t l.S.-based consultants" including [Company A and Company B]-for th~ I~.~ntreJ's reference ~nd further. .fo.!1.8.!..fler'.!JiotL!he ,CentreJ lb~J1~QDtJ~~1<;19sL~jn~~,o.'y.,withJCm1J!lllY A~lCLCmnml!ll'.!JlJg-11~~!yi~I~ ~~i!;~

United States for which these entities registered under the Lobbying Disclosure Act."

However, as a result of IDMI's Email Retention Policy which does not retain all communications, the search has returned 110 responsive communications. "

(22 U.S.C. §§ 612 and 618(a)(2); 18 U.S.C. § 2)

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COUNT FIVE

(False Statements)

44. Paragraphs 1 through 34 and paragraph 43 are incorporated here.

45. On or about November 23, 2016, and February 10, 2017, within the District of Columbia and elsewhere, in a matter within the jurisdiction of the executive branch of the Government of the United States, the defendant PAUL J. MANAFORT, JR., knowingly and willfully did cause another: to falsify, conceal, and cover up by a scheme and device a material fact; to make a materially false, fictitious, and fraudulent statement and representation; and to make and use a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement, to wit, the statements in the November 23, 2016, and February 10, 2017, submissions to the Department of Justice quoted in paragraph 43.

(18 U.S.C. §§ 2 and 1001(a))

FORFEITURE ALLEGATION

46. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code.

Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c), in the event of the defendant's convictions. Upon conviction of the offense charged in Count Two, the defendant PAUL J. MANAFORT, JR., shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property. Upon conviction of the offenses charged in Counts One, Three, and Four, the defendant PAUL J. MANAFORT, JR., shall forfeit to the United States any property, real or personal, which constitutes or is

derived

from proceeds traceable to the offense(s) of conviction. Notice is further given that, upon conviction, the United States intends to seek a judgment against the defendant for a sum of money

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representing the property described in this paragraph (to be offset by the forfeiture of any specific property).

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

- a. The real property and premises commonly known as 377 Union Street, Brooklyn, New York, 11231 (Block 429, Lot 65), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
- b. The real property and premises commonly known as 29 Howard Street, #4D, New York, New York, 10013 (Block 209, Lot 1104), including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
- c. The real property and premises commonly known as 1046 N. Edgewood Street, Arlington, Virginia, 22201-2220, including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
- d. The real property and premises commonly known as 174 Jobs Lane, Water Mill, New York 11976, including all appurtenances, improvements, and attachments thereon, and any property traceable thereto;
- e. Northwestern Mutual Universal Life Insurance Policy 18268327, and any property traceable thereto;

f. All funds held in account at Charles A. Schwab & Co. Inc., and

any property traceable thereto; and

g. All funds held in account number 0969 at The Federal Savings Bank, and

any property traceable thereto.

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Substitute Assets

5448. If any of the property described above as being subject to forfeiture, as a result of any act or

omission of any the defendant--

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

30 it is the intent of the United States of America, pursuant to Title 18, United States Code, Section

982(b) and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853, to seek forfeiture of any other property of said defendant.

(18 U.S.C. §§ 981(a)(1)(C) and 982, 28 U.S.C. § 2461(0)) October 27, 2017 31 N# A TRUE
BILL:

Date: February 16, 2018

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Robert S. Mueller, III

Special Counsel

Department of Justice