

DOCUMENT REQUESTS

Please produce the documents set forth in Schedule A, provided, however, that in order to facilitate production of documents on an expedited basis, you may limit your production at this time to documents you furnished at any time after November 8, 2016 to: (a) the Special Counsel's Office established by Department of Justice Order No. 3915-2017 (May 17, 2017); (b) the United States Attorney's Office for the Southern District of New York ("SDNY"); (c) any other federal or state regulatory and/or law enforcement agency; (d) any congressional committee; or (e) in civil or other litigation. This includes but is not limited to documents that were voluntarily provided, produced under compulsion, or seized. Instructions for producing documents appear in Schedule B, and definitions appear in Schedule C.

SCHEDULE A

- 1) All documents relating to the following:
 - a) Communications between Donald McGahn and President Donald Trump on or about January 26-27, 2017, relating to Michael Flynn's statements to the FBI about his contacts with Sergey Kislyak.
 - b) The resignation or termination of Michael Flynn, including but not limited to the discussion of Sean Spicer's February 14, 2017 public statements about Flynn's resignation.
 - c) Communications involving one or more of the following individuals relating to Michael Flynn and/or efforts to deny the existence of any investigation or evidence of contacts between the Trump Campaign and Russian Federation: Reince Priebus, James Comey, Andrew McCabe, Mike Rogers, and Dan Coats.
 - d) President Trump's contacts with James Comey on or about January 27, 2017, February 14, 2017, March 30, 2017, and April 11, 2017.
 - e) Communications involving one or more of the following individuals on or about May 8-9, 2017 relating to the possible termination of James Comey: President Trump, Vice President Pence, Reince Priebus, Stephen Bannon, Don McGahn, Jared Kushner, Stephen Miller, Jeff Sessions, and/or Rod Rosenstein. Such communications include, but are not limited to, all draft termination letters and related documents and all documents relating to the May 9, 2017 Rosenstein memorandum to Sessions entitled "Restoring Public Confidence in the FBI."
 - f) The May 9, 2017 termination of James Comey, including but not limited to the reasons for the termination.

- g) Meetings or discussions in or around May 2017 involving the FBI and/or the DOJ relating to the termination of James Comey, including but not limited to those involving Rosenstein and Andrew McCabe at which any of the following were discussed: obstruction of justice, surreptitious recording of the President, or the 25th Amendment.
 - h) Communications by President Trump or anyone acting on his behalf relating to Jeff Sessions's recusal from any investigation related to the 2016 Presidential campaign. This includes, but is not limited to: (i) any attempts to block Sessions from recusing himself in or around March 2017; (ii) any attempts to cause Sessions to reverse his recusal decision; (iii) any criticism of Sessions's March 2, 2017 recusal decision; and (iv) any attempts to limit, hide, or prevent a written ethics opinion related to Sessions's recusal decision.
 - i) The actual or possible resignation or termination of:
 - i) Jeff Sessions, including but not limited to any discussion involving President Trump regarding Sessions's possible resignation or firing on or about May 17, 2017, July 2017, and November 2018;
 - ii) Rod Rosenstein, including but not limited to any discussion involving President Trump regarding Rosenstein's possible resignation or firing throughout 2018;
 - iii) Robert Mueller, including but not limited to any discussion involving President Trump regarding Mueller's firing on or around June 2017, or any conversation in which President Trump stated, in words or substance, that he wanted the Mueller investigation shut down, restrained, or otherwise limited in or around December 2017.
 - i) The June 9, 2016 Trump Tower meeting attended by Donald Trump Jr., Paul Manafort, Kushner, Natalia Veselnitskaya, Rob Goldstone, and Rinat Akhmetshin (the "Trump Tower meeting"), including but not limited to all documents relating to the July 8, 2017 statement released in the name of Donald Trump Jr.
 - j) Discussions or efforts to discipline, reassign, terminate, encourage or force to resign, demote, or otherwise affect the job status of any of the following: Andrew McCabe, Jim Rybicki, Bill Priestap, Jim Baker, Peter Strzok, Lisa Page, and/or Bruce Ohr.
 - k) Possible pardons for Paul Manafort, Michael Flynn, or Michael Cohen.
- 2) All documents relating to the following:
- a) The "Republican Platform 2016" provisions relating to Russia and Ukraine, including, but not limited to, the exclusion of language related to providing lethal defensive weapons to Ukraine and the inclusion of language about providing "appropriate assistance" to the armed forces of Ukraine.

- b) Discussions of United States imposed sanctions or potential sanctions against the Russian Federation from June 16, 2015 to January 20, 2017 (including but not limited to the sanctions imposed pursuant to the Magnitsky Act) involving one or more of the following individuals: Donald Trump, the Trump Campaign, the Trump Organization, Paul Manafort, Rick Gates, Michael Cohen, Michael Flynn, Jeff Sessions, Jared Kushner, Thomas Bossert, Roger Stone, Jerome Corsi, George Papadopoulos, Carter Page, Konstantin Kilimnik, yourself, and/or Erik Prince.

- c) Any contacts, direct or indirect, from January 1, 2015 to January 20, 2017 between or involving the Russian Federation and its officials, agents, intermediaries, and/or instrumentalities and any of the following: Donald Trump, the Trump Campaign, the Trump Organization, Paul Manafort, Rick Gates, Michael Cohen, Michael Flynn, Jeff Sessions, Jared Kushner, Thomas Bossert, Roger Stone, Jerome Corsi, George Papadopoulos, Carter Page, Konstantin Kilimnik, yourself, and/or Erik Prince.