

## **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:
  - a) any foreign government discussing, offering, or providing, or being solicited to discuss, offer, or provide, any present or emolument of any kind whatever on or after November 8, 2016 to (a) Donald Trump or his Business Interests; (b) Trump Organization; (c) Jared Kushner or his Business Interests; (d) Ivanka Trump or her Business Interests; or (e) the 58<sup>th</sup> Presidential Inaugural Committee.
  - b) any U.S. federal, state, or local domestic government discussing, offering, or providing, or being solicited to discuss, offer, or provide, any emolument on or after November 8, 2016 to (a) Donald Trump or his Business Interests; (b) Trump Organization; (c) Jared Kushner or his Business Interests; (d) Ivanka Trump or her Business Interests; or (e) the 58<sup>th</sup> Presidential Inaugural Committee.
- 2) All documents relating to the following:
  - a) Any loan, financing transaction, or capital investment by the Russian Federation, any Russian national, any Russian business, or any other Russian entity to the Trump Organization, Donald Trump, Ivanka Trump, Jared Kushner, or any of their Business Interests. This request shall include the period from January 1, 2015 to the present and shall exclude documents relating to the purchase of individual condominium, cooperative, or apartment units.
  - b) Trump Tower Moscow (also known as the "Moscow Project") or any other proposed or possible real estate development in the Russian Federation by Donald Trump or the Trump Organization from January 1, 2015 to the present.
  - 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, K.T. McFarland, and/or Erik Prince.