

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) President Trump's contacts with James Comey on or about January 27, 2017, February 14, 2017, March 30, 2017, and April 11, 2017.
 - d) 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 or attempts to provide or receive election information, campaign data, or campaign communications with, to, or from foreign entities or individuals in connection with the 2016 U.S. Presidential primary or general elections. This includes, but is not limited to, voter data, polling information, political ad targeting, voter registration rolls, social media data, and campaign or party e-mails.
 - c) 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: yourself, Donald Trump, the Trump Campaign, the Trump Organization,

Paul Manafort, Rick Gates, Michael Cohen, Michael Flynn, Jeff Sessions, Jared Kushner, Roger Stone, Jerome Corsi, George Papadopoulos, Carter Page, Konstantin Kilimnik, K.T. McFarland, and/or Erik Prince.

- d) 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: yourself, Donald Trump, the Trump Campaign, the Trump Organization, Paul Manafort, Rick Gates, Michael Cohen, Michael Flynn, Jeff Sessions, Jared Kushner, Roger Stone, Jerome Corsi, George Papadopoulos, Carter Page, Konstantin Kilimnik, K.T. McFarland, and/or Erik Prince.
- e) The contents of meetings between President Trump and Vladimir Putin on July 7, 2017, November 11, 2017, July 16, 2018, and November 30, 2018.