

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

Crim. No. 17-201-1 (ABJ)

JOINT STATUS REPORT

The United States of America, by and through Special Counsel Robert S. Mueller, III, and Paul J. Manafort, Jr., by and through counsel, respectfully submit this joint status report to request, in light of recent developments, that the Court direct the preparation of a Presentence Investigation Report and schedule sentencing in this matter, as well as set a schedule for any pre-sentencing submissions and motions.

The government reports that:

1. On September 14, 2018, one business day before jury selection was scheduled in this matter, defendant Paul J. Manafort, Jr., pleaded guilty to a superseding information, charging him with two criminal conspiracy counts that encompassed all the criminal conduct alleged in the Superseding Indictment in this district. As the Court is aware, that criminal conduct occurred over a decade, up through April 2018.

2. Manafort pleaded pursuant to a plea agreement that required his “fully, truthfully, completely, and forthrightly” cooperating with the government. Plea Agreement, Doc. 422 ¶ 8; Plea Hr’g Tr. 39:10-17, 48:11-16, Sept. 14, 2018. The plea agreement provides that if the defendant fails to fulfill completely “each and every one” of his obligations under this agreement, or “engages in any criminal activity prior to sentencing,” the defendant will be in breach of the

agreement. A breach relieves the government of any obligations it has under the agreement, including its agreement to a reduction in the Sentencing Guidelines for acceptance of responsibility, but leaves intact all the obligations of the defendant as well as his guilty pleas. Plea Agreement, Doc. 422 ¶¶ 4B, 8, & 13. Plea Agreement, Doc. 422 ¶¶ 7 & 9.

3. After signing the plea agreement, Manafort committed federal crimes by lying to the Federal Bureau of Investigation and the Special Counsel's Office on a variety of subject matters, which constitute breaches of the agreement. The government will file a detailed sentencing submission to the Probation Department and the Court in advance of sentencing that sets forth the nature of the defendant's crimes and lies, including those after signing the plea agreement herein.

4. As the defendant has breached the plea agreement, there is no reason to delay his sentencing herein.

The defendant reports that:

5. After signing the plea agreement, Manafort met with the government on numerous occasions and answered the government's questions. Manafort has provided information to the government in an effort to live up to his cooperation obligations. He believes he has provided truthful information and does not agree with the government's characterization or that he has breached the agreement. Given the conflict in the parties' positions, there is no reason to delay the sentencing herein, and he asks the Court to set a sentencing date in this matter.

Dated: November 26, 2018

Respectfully submitted,

ROBERT S. MUELLER, III
Special Counsel

/s/
Kevin M. Downing (D.C. Bar No. 1013984)
Law Office of Kevin M. Downing
601 New Jersey Avenue NW, Suite 620
Washington, DC 20001
(202) 754-1992
kevindowning@kdowninglaw.com

/s/ Andrew Weissmann
Andrew Weissmann
Jeannie S. Rhee (D.D.C. Bar No. 464127)
Greg D. Andres (D.D.C. Bar No. 459221)
Special Counsel's Office
950 Pennsylvania Avenue NW
Washington, DC 20530
Telephone: (202) 616-0800

/s/
Thomas E. Zehnle (D.C. Bar No. 415556)
Law Office of Thomas E. Zehnle
601 New Jersey Avenue NW, Suite 620
Washington, DC 20001
(202) 368-4668
tezehnle@gmail.com

Attorneys for the United States of America

/s/
Richard W. Westling (D.C. Bar No. 990496)
Epstein Becker & Green, P.C.
1227 25th Street, N.W.
Washington, DC 20037
Tel: 202-861-1868
Fax: 202-296-2882
Email: rwestling@ebglaw.com

Attorneys for defendant, Paul J. Manafort, Jr.