

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	Case No. 17-201-1
	)	<b>UNDER SEAL</b>
	)	
<b>PAUL J. MANAFORT, JR.</b>	)	
	)	
<b>Defendant</b>	)	
	)	

**REPLY IN SUPPORT OF UNITED STATES’ MOTION SEEKING AUTHORIZATION  
TO REVIEW COMMUNICATIONS BETWEEN PAUL J. MANAFORT AND A  
WITNESS**

Before the Court is the Taint Team’s motion requesting an Order authorizing review of certain communications between Paul J. Manafort, Jr., and a Witness (hereinafter the “Subject Communications”). The Taint Team seeks this Order consistent with findings made by Chief Judge Howell in an *ex parte* proceeding related to testimony sought from the same Witness.

The Defendant opposes the Taint Team’s motion because (1) he did not participate in the *ex parte* proceeding and (2) he claims he cannot ascertain whether Judge Howell correctly applied the crime-fraud exception to the attorney-client privilege because he does not have the record from that proceeding. These arguments must fail. First, the defendant was provided with the record from the *ex parte* proceeding on April 3, 2018, and April 17, 2018, with only limited redactions necessary to protect the source of certain information. (ECF No. at 6-7); *See* April 3, 2018, and April 17, 2018, Letters, enclosed as Exhibit A. Second, the Defendant was invited to participate in the *ex parte* proceeding as the putative privilege holder, but declined to do so. (ECF No. 360 at

6). There remains no reason to disturb the Chief Judge's findings. For the foregoing reasons, the United States respectfully requests that the Court issue the proposed Order authorizing Investigation Team review of the Subject Communications.

Respectfully submitted,

By: /s/ Elizabeth Aloï

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Dated: August 27, 2018

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing was served this 27th day of August, 2018, by Federal Express and electronic mail upon the following:

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