

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal Case No. 21-582 (CRC)
	:	
MICHAEL A. SUSSMANN,	:	UNDER SEAL
	:	
Defendant.	:	

**GOVERNMENT’S SUPPLEMENTAL EXHIBITS IN SUPPORT OF MOTION TO
COMPEL THE PRODUCTION OF PURPORTED PRIVILEGED COMMUNICATIONS
FOR *IN CAMERA* REVIEW**

The United States of America, by and through its undersigned attorney, Special Counsel John H. Durham, respectfully files the attached Supplemental Exhibits to its Motion to Compel the Production of Purported Privileged Communications for *In Camera* Inspection. The Government, by supplementing its motion with the attached exhibits, seeks to provide notice to the Court of a Federal Election Committee (“FEC”) conciliation agreement with the Democratic National Committee (“DNC”) and the Hillary for America Campaign (“HFA”), and the FEC’s supporting findings, which were made public on April 28, 2022. Specifically, the FEC found “probable cause to believe” that the DNC and HFA improperly reported their payments to Perkins Coie for Fusion GPS’s opposition research as “legal and compliance consulting.” See Exhibit 2. The attached exhibits, as well as additional

relevant materials from the FEC's enforcement investigation are publicly available at

<https://www.fec.gov/data/legal/matter-under-review/7449>.

Respectfully submitted,

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