

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)
EX PARTE AND UNDER SEAL

GOVERNMENT'S MOTION FOR LEAVE TO FILE
A SUPPLEMENTAL RESPONSE TO DEFENDANT'S MOTION FOR
RECONSIDERATION OF CONDITIONS OF RELEASE WITHIN TEN DAYS
AND FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

The United States of America, by and through Special Counsel Robert S. Mueller, III, respectfully moves for (1) leave to file a supplemental response to defendant Paul J. Manafort, Jr.'s pending motion for reconsideration of the conditions of his release (Doc. 291) within ten days from this date, and (2) for leave to file under seal this motion and the attached documents in support of this motion.

On May 17, 2018, the government filed its response (Doc. 304) to Manafort's motion for reconsideration of the conditions of his release. The government's filing indicated, based on information available to the government at that time, that it did not oppose Manafort's renewed motion subject to various conditions. The government submitted that certain property owners should be interviewed and should receive admonitions commonly given to sureties in this circumstance. The following day, May 18, 2018, the Court ordered the government to conduct such interviews, and ordered Manafort to file his reply to the government's proposal, by today—*i.e.*, May 25, 2018.

The government has no objection to the sureties proposed by the defendant. However, as discussed in the declaration submitted in connection with this motion, the government has recently

obtained information that has caused it to reconsider its prior conditional consent to Manafort's motion. During the next ten days, the government anticipates taking additional investigative steps pertinent to the investigation. To the extent that Manafort completes his bail paperwork sooner than the requested ten-day period, the government would request an opportunity to be heard to apprise the Court of matters pertinent to its final bail decision.

Furthermore, sealing of this motion and the attached pleadings is appropriate because the matter discussed herein is under active investigation and the public disclosure of the information discussed in these pleadings could interfere with that investigation.

Accordingly, the government requests that the Court grant leave to file a supplemental response to defendant's motion for reconsideration of conditions of release, and that the Court grant leave to file this motion and its attached declaration and exhibits under seal. Counsel for defendant Manafort has not been apprised of this investigation and thus the government has not sought his consent to this application. A proposed Order is attached to this motion.

Respectfully submitted,

ROBERT S. MUELLER III
Special Counsel

Dated: May 25, 2018

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