

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RICHARD BEHAR

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY,

Defendant.

Nos. 17 Civ. 8153 (LAK)  
18 Civ. 7516 (LAK)

**DECLARATION OF JOHN LANGFORD**

1. I am a supervising attorney at Yale Law School's Media Freedom and Information Access Clinic ("MFIA Clinic"), which represents Plaintiff Richard Behar in this action concerning Freedom of Information Act ("FOIA") requests seeking access to Secret Service Records related to the agency's protection of candidate Donald Trump.

2. I am an attorney licensed to practice law in New York.

3. I submit this declaration in support of Plaintiff's cross-motion for summary judgment and opposition to the Government's motion for summary judgment.

**A. FOIA Requests and Administrative Record**

4. Attached hereto as **Exhibit A** is a true and correct copy of a FOIA request plaintiff submitted to the Secret Service on September 22, 2017, requesting records cataloguing visitors to candidate Trump, family members, and campaign officials during the election and prior to the inauguration.

5. Attached hereto as **Exhibit B** is a true and correct copy of two emails with attachments in redacted form produced by the Secret Service on August 1, 2018.

6. Attached hereto as **Exhibit C** is a true and correct copy of two additional redacted emails produced by the Secret Service on October 3, 2018.

7. Attached hereto as **Exhibit D** is a true and correct copy of a May 2, 2018, email from counsel for the Secret Service to counsel for Mr. Behar informing plaintiff that the government had located certain schedules that included references to future meetings with Mr. Trump but that the agency did not consider those schedules responsive to his request.

8. Attached hereto as **Exhibit E** is a true and correct copy of a May 14, 2018, FOIA request submitted by Mr. Behar to the Secret Service requesting the schedules referenced by the Secret Service in its May 2, 2018, email.

9. Attached hereto as **Exhibit F** is a true and correct copy of the Secret Service's June 1, 2018, denial of Mr. Behar's May 14, 2018, FOIA request for the schedules.

10. Attached hereto as **Exhibit G** is a true and correct copy of Mr. Behar's July 2, 2018, administrative appeal of the Secret Service's denial of his second FOIA request.

11. Attached hereto as **Exhibit H** is a true and correct copy of the Secret Service's denial of Mr. Behar's July 2, 2018, administrative appeal.

12. On or about January 8, 2018, counsel for the Secret Service informed me and members of the MFIA Clinic via telephone that the office within the Secret Service which conducts background checks did not conduct background checks for visitors to candidate Trump during the campaign or for visitors to Trump Tower during the transition period. Counsel for the Secret Service relayed that the Secret Service *did* screen visitors to President-elect Trump's Washington, D.C. transition office, but that President-elect Trump did not visit the transition office during the transition.

**B. Secret Service Protection Afforded Candidates, Including Candidate and President-Elect Trump**

13. Attached hereto as **Exhibit I** is a true and correct copy of the following publicly available website: *Frequently Asked Questions*, U.S. Secret Serv.

<https://www.secretservice.gov/about/faqs/> (last visited Oct. 29, 2018).

14. Attached hereto as **Exhibit J** is a true and correct copy of the following publicly available document: 114 Cong. Rec. 16,149 (daily ed. June 6, 1968) (statement of Sen. Monroney).

15. Attached hereto as **Exhibit K** is a true and correct copy of the following publicly available article: Isaac Arnsdorf & Kenneth P. Vogel, *Trump Received \$1.6 Million From Secret Service*, Politico (Sept. 22, 2016), <https://www.politico.com/story/2016/09/donald-trump-secret-service-campaign-travel-payments-228553>.

16. Attached hereto as **Exhibit L** is a true and correct copy of the following publicly available article: Sy Mukherjee, *Trump's Companies Made \$1.6 Million Off the Secret Service*, Fortune (Sept. 23, 2016), <http://fortune.com/2016/09/23/donald-trump-secret-service/>.

17. Attached hereto as **Exhibit M** is a true and correct copy of the following publicly available article: Rene Marsh, *First on CNN: US Secret Service Overpaid Presidential Campaigns \$4 Million for Plane Travel*, CNN Politics (May 31, 2018), <https://www.cnn.com/2018/05/31/politics/secret-service-overpaid-presidential-campaigns-4-million-plane-travel/index.html>.

18. Attached hereto as **Exhibit N** is a true and correct copy of the following publicly available article: Tom Winter, *NYPD, Secret Service Upping Security at Trump Tower for President-Elect Donald Trump*, NBC N.Y. (Nov. 9, 2016),

<https://www.nbcnewyork.com/news/local/Donald-Trump-New-York-City-Security-Police-NYPD-Secret-Service-Tower-400578461.html>.

19. Attached hereto as **Exhibit O** is a true and correct copy of the following publicly available article: Pamela Brown, Shimon Prokupecz & Julian Cummings, *Secret Service Considering Renting a Floor at Trump Tower to Protect Future First Family*, CNN (Nov. 26, 2016), <https://www.cnn.com/2016/11/25/politics/secret-service-trump-tower/index.html>.

20. Attached hereto as **Exhibit P** is a true and correct copy of the following publicly available article: Julia Marsh, *Trump Tower Security May Take Over 2 Floors – and Cost Millions*, N.Y. Post (Nov. 24, 2016) <https://nypost.com/2016/11/24/trump-tower-security-may-take-over-2-floors-and-cost-millions/>.

21. Attached hereto as **Exhibit Q** is a true and correct copy of the following publicly available article: Jim Zarroli, *Trump Tower's Newest Tenants Likely to Be the Secret Service*, NPR (Dec. 14, 2016), <https://www.npr.org/2016/12/14/505555997/trump-towers-newest-tenants-likely-to-be-the-secret-service>.

22. Attached hereto as **Exhibit R** is a true and correct copy of the following publicly available article: Tara Palmer, *Secret Service Advertised as Hot "New Amenity" at Trump Tower*, Politico (Dec. 6, 2016), <https://www.politico.com/story/2016/12/trump-tower-secret-service-amenities-232216>.

23. Attached hereto as **Exhibit S** is a true and correct copy of the following publicly available article: Paul Sonne, *U.S. Military's Space in Trump Tower Costs \$130,000 a Month*, Wall Street J. (July 19, 2017), <https://www.wsj.com/articles/u-s-militarys-space-in-trump-tower-costs-130-000-a-month-1500428508>.

24. Attached hereto as **Exhibit T** is a true and correct copy of the following publicly available report: Secret Serv., Dept. of Homeland Security, Budget Overview (2018), [https://www.dhs.gov/sites/default/files/publications/CFO/17\\_0524\\_U.S.\\_Secret\\_Service.pdf?](https://www.dhs.gov/sites/default/files/publications/CFO/17_0524_U.S._Secret_Service.pdf?)

25. Attached hereto as **Exhibit U** is a true and correct copy of the following publicly available article: Chris Isidore, Shimon Prokupecz & David Shortell, *Protecting Donald Trump Costs New York City More Than \$1 Million a Day*, CNN Money (Nov. 21, 2016), <https://money.cnn.com/2016/11/21/news/protecting-donald-trump/index.html>.

26. Attached hereto as **Exhibit V** is a true and correct copy of the following publicly available article: Kevin Johnson, *Exclusive: Secret Service Depletes Funds to Pay Agents Because of Trump's Frequent Travel, Large Family*, USA Today (Aug. 22, 2017), <https://www.usatoday.com/story/news/politics/2017/08/21/secret-service-cant-pay-agents-because-trumps-frequent-travel-large-family/529075001/>.

27. Attached hereto as **Exhibit W** is a true and correct copy of the following publicly available article: Barbara Demick, *Mar-a-Lago, Dubai, Aspen: The Bottom Line on Protecting Trumps in the First 100 Days? More Than \$30 Million*, LA Times (May 8, 2017), <http://www.latimes.com/politics/la-na-trump-expenses-20170508-htmlstory.html>.

28. Attached hereto as **Exhibit X** is a true and correct copy of the following publicly available article: Lisa Rein, *Secret Service Says It Will Run Out of Money to Protect Trump and His Family Sept. 30*, Wash. Post (Aug. 21, 2017), [https://www.washingtonpost.com/politics/secret-service-says-it-will-run-out-of-money-to-protect-trump-and-his-family-sept-30/2017/08/21/93d30132-868c-11e7-961d-2f373b3977ee\\_story.html](https://www.washingtonpost.com/politics/secret-service-says-it-will-run-out-of-money-to-protect-trump-and-his-family-sept-30/2017/08/21/93d30132-868c-11e7-961d-2f373b3977ee_story.html).

29. Attached hereto as **Exhibit Y** is a true and correct copy of the following publicly available article: Nicholas Fandos, *Congress Allocates \$120 Million for Trump Family's Security Costs*, N.Y. Times (May 1, 2017), <https://www.nytimes.com/2017/05/01/us/politics/secret-service-trump-protection.html>.

30. Attached hereto as **Exhibit Z** is a true and correct copy of the following publicly available article: Stephanie Murray, *Don Jr. and Eric Trump Racked Up Nearly \$250,000 in Secret Service Costs in One Month, Watchdog Says*, Politico (July 18, 2018), <https://www.politico.com/story/2018/07/18/eric-donald-trump-jr-secret-service-costs-731113>.

**C. Reported Russian Contacts with the Trump Campaign, Transition Team, and Administration**

31. Attached hereto as **Exhibit AA** is a true and correct copy of the following publicly available article: David E. Sanger & Nick Corasaniti, *D.N.C. Says Russian Hackers Penetrated Its Files, Including Dossier on Donald Trump*, N.Y. Times (June 14, 2016), <https://www.nytimes.com/2016/06/15/us/politics/russian-hackers-dnc-trump.html>.

32. Attached hereto as **Exhibit BB** is a true and correct copy of the following publicly available article: Tom Hamburger, Carol D. Leonnig & Rosalind S. Helderman, *Trump Campaign Emails Show Aide's Repeated Efforts to Set Up Russia Meetings*, Wash. Post (Aug. 14, 2017), [https://www.washingtonpost.com/politics/trump-campaign-emails-show-aides-repeated-efforts-to-set-up-russia-meetings/2017/08/14/54d08da6-7dc2-11e7-83c7-5bd5460f0d7e\\_story.html](https://www.washingtonpost.com/politics/trump-campaign-emails-show-aides-repeated-efforts-to-set-up-russia-meetings/2017/08/14/54d08da6-7dc2-11e7-83c7-5bd5460f0d7e_story.html).

33. Attached hereto as **Exhibit CC** is a true and correct copy of the following publicly available article: Troy Griggs, K.K. Rebecca Lai & Jasmine C. Lee, *How a Trump Adviser Repeatedly Sought a Meeting with Russia*, N.Y. Times (Oct. 30, 2017), <https://www.nytimes.com/interactive/2017/10/30/us/politics/papadopoulos-russia-trump.html>.

34. Attached hereto as **Exhibit DD** is a true and correct copy of the following publicly available article: Daniella Silva, *Papadopoulos Says Trump Campaign Officials Were 'Fully Aware' of Efforts for Putin Meeting*, NBC (Sept. 9, 2018), <https://www.nbcnews.com/politics/politics-news/papadopoulos-says-trump-campaign-officials-were-fully-aware-efforts-putin-n907891>.

35. Attached hereto as **Exhibit EE** is a true and correct copy of the following publicly available article: Jo Becker, Matt Apuzzo & Adam Goldman, *Trump Team Met with Lawyer Linked to Kremlin During Campaign*, N.Y. Times (July 8, 2017), <https://www.nytimes.com/2017/07/08/us/politics/trump-russia-kushner-manafort.html>.

36. Attached hereto as **Exhibit FF** is a true and correct copy of the following publicly available article: Jo Becker, Matt Apuzzo & Adam Goldman, *Trump's Son Met with Russian Lawyer After Being Promised Damaging Information on Clinton*, N.Y. Times (July 9, 2017), <https://www.nytimes.com/2017/07/09/us/politics/trump-russia-kushner-manafort.html>.

37. Attached hereto as **Exhibit GG** is a true and correct copy of the following publicly available article: Darren Samuelsohn, Quint Forgy & Andrew Restuccia, *Cohen Says Trump Approved Trump Tower Meeting with Russians*, Politico (July 26, 2018), <https://www.politico.com/story/2018/07/26/cohen-trump-tower-meeting-russians-745123>.

38. Attached hereto as **Exhibit HH** is a true and correct copy of the following publicly available article: Sophie Tatum, *Secret Service: Donald Trump Jr. Didn't Have Agency's Protection at Time of Meeting*, CNN Politics (July 17, 2017), <https://www.cnn.com/2017/07/16/politics/donald-trump-jr-jay-sekulow-secret-service/index.html>.

39. Attached hereto as **Exhibit II** is a true and correct copy of the following publicly available article: Arshad Mohammed & Howard Schneider, *U.S. Secret Service Rejects Suggestion It Vetted Trump Son's Meeting*, Reuters (July 16, 2017), <https://www.reuters.com/article/us-usa-trump-russia-idUSKBN1A10Q9>.

40. Attached hereto as **Exhibit JJ** is a true and correct copy of the following publicly available article: Meridith McGraw, *Secret Service Likely Wouldn't Have Intervened in Trump Jr.-Russia Meeting*, ABC News (July 17, 2017), <https://abcnews.go.com/Politics/secret-service-intervene-donald-trump-jrs-meeting-russians/story>.

41. Attached hereto as **Exhibit KK** is a true and correct copy of the following publicly available article: Adam Entous, Ellen Nakashima & Greg Miller, *Sessions Met with Russian Envoy Twice Last Year, Encounters He Later Did Not Disclose*, Wash. Post (Mar. 1, 2017), [https://www.washingtonpost.com/world/national-security/sessions-spoke-twice-with-russian-ambassador-during-trumps-presidential-campaign-justice-officials-say/2017/03/01/77205eda-feac-11e6-99b4-9e613afeb09f\\_story.html](https://www.washingtonpost.com/world/national-security/sessions-spoke-twice-with-russian-ambassador-during-trumps-presidential-campaign-justice-officials-say/2017/03/01/77205eda-feac-11e6-99b4-9e613afeb09f_story.html).

42. Attached hereto as **Exhibit LL** is a true and correct copy of the following publicly available article: Adam Entous, Ellen Nakashima & Greg Miller, *Sessions Discussed Trump Campaign-Related Matters with Russian Ambassador, U.S. Intelligence Intercepts Show*, Wash. Post (July 21, 2017), [https://www.washingtonpost.com/world/national-security/sessions-discussed-trump-campaign-related-matters-with-russian-ambassador-us-intelligence-intercepts-show/2017/07/21/3e704692-6e44-11e7-9c15-177740635e83\\_story.html](https://www.washingtonpost.com/world/national-security/sessions-discussed-trump-campaign-related-matters-with-russian-ambassador-us-intelligence-intercepts-show/2017/07/21/3e704692-6e44-11e7-9c15-177740635e83_story.html).

43. Attached hereto as **Exhibit MM** is a true and correct copy of the following publicly available article: Maggie Haberman, Mark Mazzetti & Matt Apuzzo, *Kushner Is Said to Have Discussed a Secret Channel to Talk to Russia*, N.Y. Times (May 26, 2017),



<https://www.nytimes.com/2017/05/26/us/politics/kushner-talked-to-russian-envoy-about-creating-secret-channel-with-kremlin.html>.

44. Attached hereto as **Exhibit NN** is a true and correct copy of the following publicly available article: David Filipov, Amy Brittain, Rosalind S. Helderman & Tom Hamburger, *Explanations for Kushner's Meeting With Head of Kremlin-Linked Bank Don't Match Up*, Wash. Post (June 1, 2017), [https://www.washingtonpost.com/politics/explanations-for-kushners-meeting-with-head-of-kremlin-linked-bank-dont-match-up/2017/06/01/dd1bdbb0-460a-11e7-bcde-624ad94170ab\\_story.html](https://www.washingtonpost.com/politics/explanations-for-kushners-meeting-with-head-of-kremlin-linked-bank-dont-match-up/2017/06/01/dd1bdbb0-460a-11e7-bcde-624ad94170ab_story.html).

45. Attached hereto as **Exhibit OO** is a true and correct copy of the following publicly available article: David Ignatius, Opinion, *Why Did Obama Dawdle on Russia's Hacking?*, Wash. Post (Jan 12, 2017), [https://www.washingtonpost.com/opinions/why-did-obama-dawdle-on-russias-hacking/2017/01/12/75f878a0-d90c-11e6-9a36-1d296534b31e\\_story.html](https://www.washingtonpost.com/opinions/why-did-obama-dawdle-on-russias-hacking/2017/01/12/75f878a0-d90c-11e6-9a36-1d296534b31e_story.html).

46. Attached hereto as **Exhibit PP** is a true and correct copy of the following publicly available article: Greg Miller, Adam Entous & Ellen Nakashima, *National Security Adviser Flynn Discussed Sanctions with Russian Ambassador, Despite Denials, Officials Say*, Wash. Post (Feb. 9, 2017), [https://www.washingtonpost.com/world/national-security/national-security-adviser-flynn-discussed-sanctions-with-russian-ambassador-despite-denials-officials-say/2017/02/09/f85b29d6-ee11-11e6-b4ff-ac2cf509efe5\\_story.html](https://www.washingtonpost.com/world/national-security/national-security-adviser-flynn-discussed-sanctions-with-russian-ambassador-despite-denials-officials-say/2017/02/09/f85b29d6-ee11-11e6-b4ff-ac2cf509efe5_story.html).

47. Attached hereto as **Exhibit QQ** is a true and correct copy of the following publicly available article: Glenn Kessler, *Michael Flynn's Guilty Plea: A Comprehensive Timeline*, Wash. Post (Dec. 1, 2017), <https://www.washingtonpost.com/news/fact->

checker/wp/2017/12/01/michael-flynn-guilty-plea-a-comprehensive-timeline/?utm\_term=.bf749cdea3ff.

48. Attached hereto as **Exhibit RR** is a true and correct copy of the following publicly available article: William Gallo, *Even Before Inauguration, Trump Asserts Himself on Policy Matters*, VOA News (Dec. 23, 2016), <https://www.voanews.com/a/even-before-inauguration-donald-trump-asserts-himself-policy-matters/3648761.html>.

49. Attached hereto as **Exhibit SS** is a true and correct copy of the following publicly available article: Steve Vladeck, *The President-Elect and the Logan Act*, (Jan. 13, 2017), <https://www.justsecurity.org/36263/president-elect-logan-act/>.

50. Attached hereto as **Exhibit TT** is a true and correct copy of the following publicly available article: Michael D. Shear & Adam Goldman, *Michael Flynn Pleads Guilty to Lying to the F.B.I. and Will Cooperate with Russia Inquiry*, N.Y. Times (Dec. 1, 2017), <https://www.nytimes.com/2017/12/01/us/politics/michael-flynn-guilty-russia-investigation.html>.

51. Attached hereto as **Exhibit UU** is a true and correct copy of the following publicly available article: Robert Windrem, *Guess Who Came to Dinner with Flynn and Putin*, NBC News (Apr. 18, 2017), <https://www.nbcnews.com/news/world/guess-who-came-dinner-flynn-putin-n742696>.

52. Attached hereto as **Exhibit VV** is a true and correct copy of the following publicly available article: Matt Apuzzo, Matthew Rosenberg & Adam Goldman, *Top Russian Official Tried to Broker 'Backdoor' Meeting Between Trump and Putin*, N.Y. Times (Nov. 17, 2017), <https://www.nytimes.com/2017/11/17/us/politics/trump-russia-kushner.html>.

53. Attached hereto as **Exhibit WW** is a true and correct copy of the following publicly available article: Noah Kirsch, *Exclusive: Powerful Russian Partner Boasts of Ongoing*

*Access to Trump Family*, Forbes (Mar. 20, 2017),

<https://www.forbes.com/sites/noahkirsch/2017/03/20/russian-billionaire-family-trump-ties-ongoing/>.

54. Attached hereto as **Exhibit XX** is a true and correct copy of the following publicly available article: Kevin Uhrmacher & Kim Soffen, *A Guide to the Five Major Investigations of the Trump Campaign's Possible Ties to Russia*, Wash. Post (Jun. 17, 2017), <https://www.washingtonpost.com/graphics/national/trump-russia-investigations>.

55. Attached hereto as **Exhibit YY** is a true and correct copy of the following publicly available article: Editorial Board, *With Russia Investigation, Plenty to See Here*, USA Today (Sept. 18, 2017), <https://www.usatoday.com/story/opinion/2017/09/18/russia-investigation-plenty-see-here-editorials-debates/674777001/>.

56. Attached hereto as **Exhibit ZZ** is a true and correct copy of the following publicly available article: Michael S. Schmidt, *Mueller Seeks White House Documents Related to Trump's Actions as President*, N.Y. Times (Sept. 20, 2017), <https://www.nytimes.com/2017/09/20/us/politics/mueller-trump-russia.html>.

57. Attached hereto as **Exhibit AAA** is a true and correct copy of the following publicly available article: Sharon LaFraniere, Matt Apuzzo & Adam Goldman, *With a Search Warrant and a Threatened Indictment, Mueller's Inquiry Sets a Tone*, N.Y. Times (Sept. 18, 2017), <https://www.nytimes.com/2017/09/18/us/politics/mueller-russia-investigation.html>.

58. Attached hereto as **Exhibit BBB** is a true and correct copy of the following publicly available article: Jeremy Herb, Lauren Fox & Manu Raju, *Senate Committee Agrees with Intelligence Community Assessment of Election Meddling, Breaking with GOP House*

*Investigation*, CNN (May 16, 2018), <https://www.cnn.com/2018/05/16/politics/senate-committee-agrees-intelligence-community-election-meddling/index.html>.

59. Attached hereto as **Exhibit CCC** is a true and correct copy of the following publicly available article: Andrew Prokop, *All of Robert Mueller's Indictments and Plea Deals in the Russia Investigation So Far*, Vox (Oct. 10, 2018), <https://www.vox.com/policy-and-politics/2018/2/20/17031772/mueller-indictments-grand-jury>.

60. Attached hereto as **Exhibit DDD** is a true and correct copy of the following publicly available article: Rosalind S. Helderman, *Trump Associate Socialized with Alleged Russian Agent Maria Butina in Final Weeks of 2016 Campaign*, Wash. Post (Aug. 3, 2018), [https://www.washingtonpost.com/politics/trump-associate-socialized-with-alleged-russian-agent-maria-butina-in-final-weeks-of-2016-campaign/2018/08/03/d87c1d84-96a6-11e8-80e1-00e80e1fdf43\\_story.html](https://www.washingtonpost.com/politics/trump-associate-socialized-with-alleged-russian-agent-maria-butina-in-final-weeks-of-2016-campaign/2018/08/03/d87c1d84-96a6-11e8-80e1-00e80e1fdf43_story.html).

**D. Reported Meetings Between Business Persons and Lobbyists and Candidate Trump While Under Secret Service Protection**

61. Attached hereto as **Exhibit EEE** is a true and correct copy of the following publicly available article: Sarah Posner, *What If Our System Can't Handle Trump's Out-of-Control Self-Dealing?*, Wash. Post (Sept. 6, 2017), <https://www.washingtonpost.com/blogs/plum-line/wp/2017/09/06/what-if-our-system-cant-handle-trumps-out-of-control-self-dealing/>.

62. Attached hereto as **Exhibit FFF** is a true and correct copy of the following publicly available article: Adam Davidson, *Trump's Business of Corruption*, New Yorker (Aug. 21, 2017), <https://www.newyorker.com/magazine/2017/08/21/trumps-business-of-corruption>.

63. Attached hereto as **Exhibit GGG** is a true and correct copy of the following publicly available article: Brad Heath et al., *Trump Gets Millions from Golf Members. CEOs and*

*Lobbyists Get Access to President*, USA Today (Sept. 6, 2017),

<https://www.usatoday.com/story/news/2017/09/06/trump-gets-millions-golf-members-ceos-and-lobbyists-get-access-president/632505001/>.

64. Attached hereto as **Exhibit HHH** is a true and correct copy of the following publicly available article: Michael D. Shear, Steve Eder & Patricia Cohen, *Donald Trump's Taxes: What We Know and Don't Know*, N.Y. Times (Mar. 15, 2017), <https://www.nytimes.com/interactive/2016/us/politics/donald-trump-taxes-explained.html>.

65. Attached hereto as **Exhibit III** is a true and correct copy of the following publicly available article: Maggie Haberman, *Donald Trump Met Secretly with Interest Groups*, N.Y. Times (Apr. 4, 2016), <https://www.nytimes.com/politics/first-draft/2016/04/04/donald-trump-met-secretly-with-interests-groups/>.

66. Attached hereto as **Exhibit JJJ** is a true and correct copy of the following publicly available article: Will Drabold, *Donald Trump Heads for Coal Industry Fundraiser in West Virginia*, Time (June 28, 2016), <http://time.com/4384957/donald-trump-coal-global-warming-murray/>.

67. Attached hereto as **Exhibit KKK** is a true and correct copy of the following publicly available article: Mariam Khan, *Interest Groups Donated to Trump's Record-Breaking Inauguration Fund*, ABC News (Apr. 20, 2017), <https://abcnews.go.com/Politics/interest-groups-donated-trumps-record-breaking-inauguration-fund/story?id=46909846>.

68. Attached hereto as **Exhibit LLL** is a true and correct copy of the following publicly available article: Suzanne Goldenberg & Helena Bengtsson, *Oil and Gas Industry Has Pumped Millions into Republican Campaigns*, Guardian (Mar. 3, 2016),

<https://www.theguardian.com/us-news/2016/mar/03/oil-and-gas-industry-has-pumped-millions-into-republican-campaigns>.

69. Attached hereto as **Exhibit MMM** is a true and correct copy of the following publicly available article: Marianne Lavelle, *Fossil Fuel Industries Pumped Millions into Trump's Inauguration, Filings Show*, Inside Climate News (Apr. 19, 2017), <https://insideclimatenews.org/news/19042017/fossil-fuels-oil-coal-gas-exxon-chevron-bp-donald-trump-inauguration-donations>.

70. Attached hereto as **Exhibit NNN** is a true and correct copy of the following publicly available article: Mary Ellen Kustin, *Are Industry Interests Behind President Trump's Attack on National Monuments?*, Ctr. Am. Progress (May 8, 2017), <https://www.americanprogress.org/issues/green/news/2017/05/08/432011/industry-interests-behind-president-trumps-attack-national-monuments/>.

**E. Reported Associations Among Mr. Trump Or His Associates and Additional Individuals Identified in Mr. Behar's FOIA Requests**

71. Attached hereto as **Exhibit OOO** is a true and correct copy of the following publicly available article: Annie Karni, *U.K. Firebrand Farage Angles for a Meeting with Trump*, Politico (July 13, 2018), <https://www.politico.com/story/2018/07/13/nigel-farage-trump-meeting-718461>.

72. Attached hereto as **Exhibit PPP** is a true and correct copy of the following publicly available article: Ken Dilanian, *Trump Lawyer Confirms Meeting Ukrainian, Denies Carrying Peace Plan*, NBC News (Feb. 20, 2017), <https://www.nbcnews.com/news/us-news/trump-lawyer-confirms-meeting-ukrainian-denies-carrying-peace-plan-n723386>.

73. Attached hereto as **Exhibit QQQ** is a true and correct copy of the following publicly available article: Michael Crowley, *All of Trump's Russia Ties, In 7 Charts*, Politico

(Mar.-Apr. 2017), <https://www.politico.com/magazine/story/2017/03/connections-trump-putin-russia-ties-chart-flynn-page-manafort-sessions-214868>.

74. Attached hereto as **Exhibit RRR** is a true and correct copy of the following publicly available article: David D. Kirkpatrick, *Who Is Behind Trump's Links to Arab Princes? A Billionaire Friend*, N.Y. Times (June 13, 2018), <https://www.nytimes.com/2018/06/13/world/middleeast/trump-tom-barrack-saudi.html>.

75. Attached hereto as **Exhibit SSS** is a true and correct copy of the following publicly available article: Kevin G. Hall, *Master of Selfies with GOP Pols, Soviet Émigré Has a Confounding Past*, Miami Herald (Feb. 1, 2018), <https://www.mcclatchydc.com/news/politics-government/article197764899.html>.

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77. Attached hereto as **Exhibit UUU** is a true and correct copy of the following publicly available article: Brian Ross & Matthew Mosk, *Special Counsel Probing Flow of Russian-American Money to Trump Political Funds*, ABC News (Sept. 26, 2017), <https://abcnews.go.com/Politics/investigators-follow-flow-money-trump-wealthy-donors-russian/story?id=50100024>.

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79. Attached hereto as **Exhibit WWW** is a true and correct copy of the following publicly available article: Cristina Maza, *These Russian Oligarchs on the U.S. Treasury List Have Ties to Trump and His Campaign*, Newsweek (Jan. 30, 2018), <https://www.newsweek.com/these-russian-oligarchs-us-treasury-list-have-ties-trump-and-his-campaign-795051>.

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81. Attached hereto as **Exhibit YYY** is a true and correct copy of the following publicly available article: Matthew Rosenberg, Maggie Haberman & Adam Goldman, *2 White House Officials Helped Give Nunes Intelligence Report*, N.Y. Times (Mar. 30, 2017), <https://www.nytimes.com/2017/03/30/us/politics/devin-nunes-intelligence-reports.html>.

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84. Attached hereto as **Exhibit BBBB** is a true and correct copy of the following publicly available article: Jeremy Herb & Liz Stark, *Former Trump White House Official Boris Epshteyn Testifies in House Russia Probe Thursday*, CNN (Sept. 28, 2017), <https://www.cnn.com/2017/09/28/politics/boris-epshteyn-house-intelligence-committee/index.html>.

85. Attached hereto as **Exhibit CCCC** is a true and correct copy of the following publicly available article: Mark Mazzetti, Ronen Bergman, David D. Kirkpatrick & Maggie Haberman, *Rick Gates Sought Online Manipulation Plans from Israeli Intelligence Firm for Trump Campaign*, N.Y. Times (Oct. 8, 2018), <https://www.nytimes.com/2018/10/08/us/politics/rick-gates-psy-group-trump.html>.

86. Attached hereto as **Exhibit DDDD** is a true and correct copy of the following publicly available article: Manuel Roig-Franzia & Rosalind S. Helderman, *Trump Associate Roger Stone Reveals New Contact with Russian National During 2016 Campaign*, Wash. Post (June 17, 2018), [https://www.washingtonpost.com/politics/trump-associate-roger-stone-reveals-new-contact-with-russian-national-during-2016-campaign/2018/06/17/4a8123c8-6fd0-11e8-bd50-b80389a4e569\\_story.html](https://www.washingtonpost.com/politics/trump-associate-roger-stone-reveals-new-contact-with-russian-national-during-2016-campaign/2018/06/17/4a8123c8-6fd0-11e8-bd50-b80389a4e569_story.html).

87. Attached hereto as **Exhibit EEEE** is a true and correct copy of the following publicly available article: Kenneth P. Vogel & David D. Kirkpatrick, *Fund-Raiser Held Out Access to Trump as a Prize for Prospective Clients*, N.Y. Times (Mar. 25, 2018), <https://www.nytimes.com/2018/03/25/us/politics/elliott-broidy-trump-access-circinus-lobbying.html>.

88. Attached hereto as **Exhibit FFFF** is a true and correct copy of the following publicly available article: Mark Mazzetti, Ronen Bergman & David D. Kirkpatrick, *Trump Jr.*

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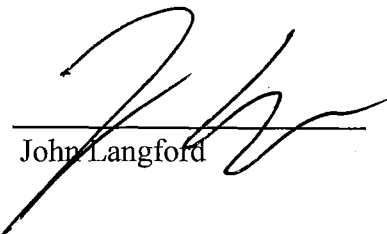
90. Attached hereto as **Exhibit HHHH** is a true and correct copy of the following publicly available article: Rebecca Ballhaus et al., *Michael Cohen's D.C. Consulting Career: Scattershot, with Mixed Success*, Wall Street J. (May 13, 2018), <https://www.wsj.com/articles/michael-cohens-d-c-consulting-career-scattershot-with-mixed-success-1526257805>.

91. Attached hereto as **Exhibit IIII** is a true and correct copy of the following publicly available article: Mark Hosenball & Jonathan Landay, *U.S. Lawmakers Question Businessman at 2016 Trump Tower Meeting: Sources*, Reuters (Dec. 26, 2017), <https://www.reuters.com/article/us-usa-trump-russia-kaveladze/u-s-lawmakers-question-businessman-at-2016-trump-tower-meeting-sources-idUSKBN1EL009>.

\* \* \* \* \*

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 31, 2018, in New Haven, Connecticut.



John Langford