

**Timeline of Key Events Related to Crossfire Hurricane Investigation**  
**(Updated: Dec. 3, 2020)**

- **June 2009:** FBI New York Field Office (NYFO) interviews Carter Page, who “immediately advised [them] that due to his work and overseas experiences, he has been questioned by and provides information to representatives of [another U.S. government agency] on an ongoing basis.”<sup>1</sup>
- **Mar. 2, 2015:** *N.Y. Times* reports that Secretary Clinton uses private email account.<sup>2</sup>
- **Mid-2015:** An FBI report describes Christopher Steele’s contact with 5 Russian oligarchs between January and May 2015 as “unusual” and “recommend[s] that a validation review be completed on Steele because of this activity.” The validation review was not conducted until early 2017.<sup>3</sup>
- **July 10, 2015:** FBI opens “Midyear Exam” investigation (MYE).<sup>4</sup>
- **Oct. 2015:** Fusion GPS hires Nellie Ohr, the wife of DOJ Attorney Bruce Ohr, to conduct research on Paul Manafort, among others.<sup>5</sup>
- **Jan. 2016:** The FBI opens a money laundering and tax evasion investigation of Paul Manafort.<sup>6</sup>
- **Mar. 21, 2016:** Carter Page joins the Trump campaign.<sup>7</sup>
- **Mar. 28, 2016:** Paul Manafort joins the Trump campaign.<sup>8</sup>

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<sup>1</sup> U.S. DEP’T OF JUSTICE, OFFICE OF THE INSPECTOR GEN., REVIEW OF FOUR FISA APPLICATIONS AND OTHER ASPECTS OF THE FBI’S CROSSFIRE HURRICANE INVESTIGATION 61 (2019) [hereinafter IG Report].

<sup>2</sup> Michael S. Schmidt, *Hillary Clinton Used Personal Email Account at State Dept., Possibly Breaking Rules*, N.Y. TIMES, Mar. 2, 2015, <https://www.nytimes.com/2015/03/03/us/politics/hillary-clintons-use-of-private-email-at-state-department-raises-flags.html>.

<sup>3</sup> IG Report at 90 n.208 (declassified). The Director of National Intelligence later declassified the IG Report’s footnotes and provided unredacted versions to the Committee’s. See Letter from Richard A. Grenell, Acting Dir. of Nat’l Intelligence, to Sen. Charles E. Grassley, S. Comm. on Fin., and Sen. Ron Johnson, S. Comm. on Homeland Sec. & Gov’t Aff. (Apr. 15, 2020), <https://www.grassley.senate.gov/sites/default/files/2020-04-15%20ODNI%20to%20CEG%20RHJ%20%28FISA%20Footnote%20Declassification%29.pdf>.

<sup>4</sup> Matt Apuzzo et al., *Comey Tried to Shield the F.B.I. from Politics. Then He Shaped an Election.*, N.Y. TIMES, Apr. 22, 2017, <https://www.nytimes.com/2017/04/22/us/politics/james-comey-election.html>.

<sup>5</sup> Tr. of Interview at 8, 111–112, H. Comm. on the Judiciary, Joint with H. Comm. on Gov’t Reform and Oversight, Interview of Nellie Ohr (Oct. 19, 2018), <https://dougcollins.house.gov/sites/dougcollins.house.gov/files/10.19.18%20Nellie%20Ohr%20Interview.pdf> [hereinafter Nellie Ohr Testimony].

<sup>6</sup> IG Report at 66 n.185; see also Dep’t of Justice production to S. Comm. on Homeland Sec. & Gov’t Aff. at SENATE-FISA2020-001644; SENATE-FISA2020-001676 n.332, Oct. 9, 2020.

<sup>7</sup> Post Opinions Staff, *A Transcript of Donald Trump’s Meeting with The Washington Post Editorial Board*, WASH. POST, Mar. 21, 2016, <https://www.washingtonpost.com/blogs/post-partisan/wp/2016/03/21/a-transcript-of-donald-trumps-meeting-with-the-washington-post-editorial-board/>.

<sup>8</sup> Alexander Burns & Maggie Haberman, *Donald Trump Hires Paul Manafort to Lead Delegate Effort*, N.Y. TIMES, Mar. 28, 2016, <https://www.nytimes.com/politics/first-draft/2016/03/28/donald-trump-hires-paul-manafort-to-lead-delegate-effort/>.

- **Apr. 1, 2016:** FBI HQ advises NYFO to investigate Carter Page (opened Apr. 6).<sup>9</sup>
- **Apr. 2016:** The DNC and Clinton campaign, through Perkins Coie partner Marc Elias, retain Fusion GPS.<sup>10</sup>
- **May 2016:** George Papadopoulos meets with a representative of a Friendly Foreign Government (FFG).<sup>11</sup>
- **May 4, 2016:**
  - Donald Trump becomes the presumptive GOP nominee.<sup>12</sup>
  - FBI Deputy Assistant Director Peter Strzok texts FBI Special Counsel Lisa Page: “Now the pressure really starts to finish MYE.” Page responds: “It sure does.”<sup>13</sup>
- **June 2016:** Fusion GPS hires Christopher Steele.<sup>14</sup>
- **June 24, 2016:** Steele delivers first memo to Fusion GPS.<sup>15</sup>
- **Early July 2016:**
  - Two persons affiliated with Russian Intelligence Services are aware of Steele’s election investigation.<sup>16</sup>
  - A person affiliated with a Russian oligarch is possibly aware of Steele’s election investigation.<sup>17</sup>
- **July 5, 2016:**
  - FBI Director Comey issues a statement ending the MYE investigation.<sup>18</sup>
  - Christopher Steele provides an election report to FBI handling agent in Europe.<sup>19</sup>
  - Christopher Steele has since testified that, during this July meeting with the FBI, he “explained that Glenn Simpson, GPS Fusion was our commissioner but the ultimate client were the leadership of the Clinton presidential campaign and that we understood the candidate herself was aware of the reporting at least.”<sup>20</sup>

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<sup>9</sup> IG Report at 62.

<sup>10</sup> Adam Entous, et al., *Clinton campaign, DNC paid for research that led to Russia dossier*, WASH. POST, Oct. 24, 2017, [https://www.washingtonpost.com/world/national-security/clinton-campaign-dnc-paid-for-research-that-led-to-russia-dossier/2017/10/24/226fabf0-b8e4-11e7-a908-a3470754bbb9\\_story.html](https://www.washingtonpost.com/world/national-security/clinton-campaign-dnc-paid-for-research-that-led-to-russia-dossier/2017/10/24/226fabf0-b8e4-11e7-a908-a3470754bbb9_story.html).

<sup>11</sup> IG Report at 1.

<sup>12</sup> Stephen Collinson, *Donald Trump: Presumptive GOP Nominee; Sanders Takes Indiana*, CNN, May 4, 2016, <https://www.cnn.com/2016/05/03/politics/indiana-primary-highlights/index.html>.

<sup>13</sup> Text Message from Peter Strzok to Lisa Page (May 4, 2016), Strzok-Page Texts at 114 (on file with Comms.).

<sup>14</sup> IG Report at 93.

<sup>15</sup> S. REP. NO. 116-290, vol. 5, at 848 (2020).

<sup>16</sup> IG Report at 189 n.342 (declassified).

<sup>17</sup> *Id.* at 91 n.211 (declassified).

<sup>18</sup> James B. Comey, Dir., Fed. Bureau of Investigation, *Statement on the Investigation of Secretary Hillary Clinton’s Use of a Personal E-mail System*, Jul. 5, 2016, <https://www.fbi.gov/news/pressrel/press-releases/statement-by-fbi-director-james-b-comey-on-the-investigation-of-secretary-hillary-clinton2019s-use-of-a-personal-e-mail-system>.

<sup>19</sup> IG Report at 95.

<sup>20</sup> Tr. of Dep. at 163, *Aven*, [2020] EWHC 1812 (QB), Dep. of Christopher Steele (Mar. 17, 2020).

- **July 11-12, 2016:** Source 2 Meets Carter Page at a three-day conference.<sup>21</sup>
- **July 22, 2016:** WikiLeaks releases DNC emails.<sup>22</sup>
- **July 26, 2016:**
  - U.S. intelligence community reporting describes the “alleged approval by Hillary Clinton on July 26, 2016 of a proposal from one of her foreign policy advisors to vilify Donald Trump by stirring up a scandal claiming interference by Russian security services.”<sup>23</sup>
- **July 28, 2016:**
  - FBI HQ counterintelligence division (CD) receives FFG information that Trump campaign official George Papadopoulos “suggested the Trump team had received some kind of suggestion from Russia that it could assist . . . with the anonymous release of information during the campaign that would be damaging to [Hillary] Clinton (and President Obama).”<sup>24</sup>
  - FBI NYFO receives two Steele election reports.<sup>25</sup>
  - Lisa Page texts McCabe: “You should read this – the D[irector] surely has by now. Some of the internal links are well worth your time. [] Trump a Russian Agent? A Legal Analysis[,] <https://www.lawfareblog.com/trump-russian-agent-legal-analysis>.”<sup>26</sup>
- **July 28-31, 2016:**<sup>27</sup>
  - Neither CD Assistant Director Bill Priestap nor Executive Assistant Director Michael Steinbach want Strzok to lead the investigation because of his personal relationship with Lisa Page and instances of Strzok and Page bypassing the chain of command to advise FBI Deputy Director Andrew McCabe.<sup>28</sup>
  - McCabe overrules decision to exclude Strzok.<sup>29</sup>
  - Priestap rejects the idea of defensively briefing Trump campaign.<sup>30</sup>

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<sup>21</sup> IG Report at 315.

<sup>22</sup> Kristine Phillips, *Timeline: The events that led to the inspector general's report on the origins of the Russia probe*, USA TODAY, Mar. 21, 2016, <https://www.usatoday.com/in-depth/news/2019/12/09/horowitz-fisa-report-timeline-fbis-russia-probe-carter-page-surveillance/2623350001/>.

<sup>23</sup> Letter from John Ratcliffe, Dir. of Nat'l Intelligence, to Sen. Lindsey Graham, Chairman, S. Comm. on the Judiciary (Sept. 29, 2020), [https://www.judiciary.senate.gov/imo/media/doc/09-29-20\\_Letter%20to%20Sen.%20Graham\\_Declassification%20of%20FBI's%20Crossfire%20Hurricane%20Investigations\\_20-00912\\_U\\_SIGNED-FINAL.pdf](https://www.judiciary.senate.gov/imo/media/doc/09-29-20_Letter%20to%20Sen.%20Graham_Declassification%20of%20FBI's%20Crossfire%20Hurricane%20Investigations_20-00912_U_SIGNED-FINAL.pdf).

<sup>24</sup> IG Report at 52.

<sup>25</sup> *Id.* at 98.

<sup>26</sup> Lisa Page Text Message to Peter Strozok (Jul. 28, 2016) [FBI003980].

<sup>27</sup> IG Report at 52.

<sup>28</sup> *Id.* at 64.

<sup>29</sup> *Id.*

<sup>30</sup> *Id.* at 52, 55.

- **July 31, 2016:**
  - FBI opens the “Crossfire Hurricane” investigation (CFH).<sup>31</sup>
  - Strzok texts Lisa Page “And damn this feels momentous. Because this matters. The other one did, too, but that was to ensure we didn’t F something up. This matters because this MATTERS. So super glad to be on this voyage with you.”<sup>32</sup>
  - Case Agent 1 begins 90 day temporary assignment to CFH.<sup>33</sup>
  - Nellie and Bruce Ohr meet with Christopher Steele for breakfast in Washington, DC, where Steele “conveyed his fears that there . . . were contacts between the Russian government and the Trump campaign,” and Bruce Ohr admitted to “probably [being] aware from the beginning” that Steele was sharing his information with the Clinton campaign.<sup>34</sup>
  
- **Early August 2016:**
  - Perkins Coie partner Michael Sussman, counsel for the DNC, meets with Christopher Steele and discusses a possible connection between Alfa Bank and Trump Tower.<sup>35</sup>
  - Strobe Talbott, former Deputy Secretary of State for President Clinton and the then-President of the Brookings Institution, cold calls Christopher Steele to ask about his election reporting.<sup>36</sup>
  - According to Christopher Steele, Talbott had learned about Steele’s election reporting from National Security Advisor Susan Rice and Assistant Secretary of State Victoria Nuland.<sup>37</sup>
  
- **Aug 5, 2016:** Strzok texts Lisa Page: “Went well, best we could have expected. Other than [REDACTED] quote, ‘the White House is running this.’”<sup>38</sup>
  
- **Aug. 6, 2016:** Lisa Page texts Strzok: “And maybe you’re meant to stay where you are because you’re meant to protect the country from that menace.”<sup>39</sup>
  
- **Aug. 8, 2016:** Lisa Page texts Strzok, “[Trump’s] not ever going to become president, right? Right?!” and Strzok replies, “No. No he’s not. We’ll stop it.”<sup>40</sup>

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<sup>31</sup> *Id.* at 53.

<sup>32</sup> *Id.* at 67.

<sup>33</sup> *Id.* at 66.

<sup>34</sup> S. REP. NO. 116-290, vol. 5, at 909–10.

<sup>35</sup> Tr. of Interview at 74–75, H. Permanent Select Comm. on Intelligence Interview of Michael Sussman (Dec. 18, 2017), [https://www.dni.gov/files/HPSCI\\_Transcripts/2020-05-04-Michael\\_Sussman-MTR\\_Redacted.pdf](https://www.dni.gov/files/HPSCI_Transcripts/2020-05-04-Michael_Sussman-MTR_Redacted.pdf); Tr. of Dep. at 1–2, *Aven*, [2020] EWHC 1812 (QB), Dep. of Christopher Steele (Mar. 18, 2020).

<sup>36</sup> Tr. of Testimony at 10, *Aven*, [2020] EWHC 1812 (QB), Testimony of Christopher Steele (July 23, 2020).

<sup>37</sup> *Aven*, [2020] EWHC 1812 (QB) [76].

<sup>38</sup> Dep’t of Justice Production at DOJSCO - 700023517, contained within Def.’s Third Supp. in Support of Dismissal, Ex. E, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-5, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>39</sup> *Id.* at DOJSCO - 700023518.

<sup>40</sup> *Id.*

- **Aug. 10, 2016:**
  - FBI NYFO’s investigation of Carter Page is transferred to CFH.<sup>41</sup>
  - The FBI opens sub-file cases against Carter Page, Paul Manafort, and George Papadopoulos.<sup>42</sup>
- **Aug. 11, 2016:**
  - Strzok texts Lisa Page: “So. You come up with a codename?” Page responds, “Latitude.” Strzok responded, “[REDACTED] Yuuuuuge. Though we may save that for the man, if we ever open on him.”<sup>43</sup>
  - FBI analysts discuss that, “some of these guys want a [C]linton presidency” and call Trump a “wild card.”<sup>44</sup>
  - CFH team has initial meeting with Source 2 and “couldn’t believe [their] luck” that Source 2 knew three of the four CH subjects (Manafort, Page, and Flynn). Source 2 tells the CH team that he “had been previously acquainted with [] Flynn.”<sup>45</sup>
- **Aug. 12, 2016:** CFH team has second meeting with Source 2.<sup>46</sup>
- **Aug. 15, 2016:**
  - CFH Case Agent 1 tells FBI Office of the General Counsel (OGC) there is “a pretty solid basis” for requesting FISA authority on Carter Page.<sup>47</sup>
  - FBI OGC responds that they “need more for P[robable C[ause].”<sup>48</sup>
  - Strzok texts Lisa Page: “I want to believe the path you threw out for consideration in Andy [McCabe]’s office—that there’s no way he gets elected—but I’m afraid we can’t take that risk. It’s like an insurance policy in the unlikely event you die before you’re 40 . . . .”<sup>49</sup>
  - Comey is briefed on CFH.<sup>50</sup>
- **Aug. 16, 2016:** The FBI opens a sub-file case, Crossfire Razor, against Lt. Gen. Michael Flynn.<sup>51</sup>
- **Aug. 17, 2016:** FBI and the Office of the Director of National Intelligence (ODNI) provide a strategic intelligence briefing for Trump and selected advisors, including Lt.

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<sup>41</sup> IG Report at 63.

<sup>42</sup> IG Report at 59.

<sup>43</sup> Text Message from Peter Strzok to Lisa Page (Aug. 11, 2016) [DOJ-PROD-0000218].

<sup>44</sup> Dep’t of Justice Production at DOJSCO - 700023504, contained within Def.’s Third Supp. in Support of Dismissal, Ex. A, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-1, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020> (emphasis added).

<sup>45</sup> IG Report at 314–15.

<sup>46</sup> IG Report at 316–17.

<sup>47</sup> IG Report at 122.

<sup>48</sup> *Id.*

<sup>49</sup> U.S. DEP’T OF JUSTICE, OFFICE OF THE INSPECTOR GEN., A REVIEW OF VARIOUS ACTIONS BY THE FEDERAL BUREAU OF INVESTIGATION AND THE DEPARTMENT OF JUSTICE IN ADVANCE OF THE 2016 ELECTION 404 (2018).

<sup>50</sup> IG Report at 68–69.

<sup>51</sup> IG Report at 59.

Gen. Flynn and former Governor Chris Christie.<sup>52</sup> This briefing does not address the allegations contained in the FFG information;<sup>53</sup> a CFH agent attends and memorializes the results of the briefing.<sup>54</sup> The documents show that agents planned to use future briefings with the Trump campaign to secretly gather intelligence.<sup>55</sup>

- **August 19, 2016:** Paul Manafort resigns from Trump campaign.<sup>56</sup>
- **Aug. 20, 2016:** Source 2's first consensually monitored meeting with Carter Page.<sup>57</sup>
  - Trump Campaign Co-Chair Sam Clovis discusses “an internal campaign debate about Trump’s immigration strategy, efforts to reach out to minority groups and the impact of those efforts, and the campaign’s strategy for responding to questions about Trump’s decision not to release his tax returns.”<sup>58</sup>
  - FBI never transcribes this interview.<sup>59</sup>
- **Aug. 25, 2016:** McCabe directs CFH to contact FBI NYFO for helpful information.<sup>60</sup>
- **Aug. 27, 2016:**
  - Sen. Harry Reid sends a letter to FBI Director Comey calling for a full investigation and public disclosure of ties between the Russian government and the Trump campaign.<sup>61</sup>
- **Aug. 28, 2016:** Lisa Page texts McCabe: “A Powerful Russian Weapon: The Spread of False Stories <http://nyti.ms/2bR9n3c>.”<sup>62</sup>
- **Aug. 31, 2016:** FBI joins ODNI’s strategic intelligence briefing for Trump.<sup>63</sup>
- **Sept. 1, 2016:** Source 2’s only consensually monitored meeting with Sam Clovis.<sup>64</sup>
- **Sept. 7, 2016:** U.S. intelligence officials forward an investigative referral to FBI Director Comey and Strzok regarding “U.S. Presidential candidate Hillary Clinton’s approval of a

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<sup>52</sup> *Id.* at 340.

<sup>53</sup> *Id.* at 77.

<sup>54</sup> *Id.* at 3.

<sup>55</sup> Press release, Sen. Charles Grassley, Chairman, S. Comm. on Fin., & Sen. Ron Johnson, Chairman, S. Comm. on Homeland Sec. & Gov’t Aff. (July 23, 2020), <https://www.grassley.senate.gov/news/news-releases/declassified-records-shed-light-fbi-efforts-co-opt-intel-briefings-spy-2016-trump>.

<sup>56</sup> Nolan D. McCaskill et al., *Paul Manafort resigns from Trump campaign*, POLITICO, Aug. 18, 2016, <https://www.politico.com/story/2016/08/paul-manafort-resigns-from-trump-campaign-227197>.

<sup>57</sup> IG Report at 317–20.

<sup>58</sup> *Id.* at 329.

<sup>59</sup> *Id.*

<sup>60</sup> *Id.* at 99.

<sup>61</sup> Letter from Sen. Harry Reid, Min. Leader, to James Comey, Dir. Fed. Bureau of Investigation (Aug. 27, 2016), <https://www.nytimes.com/interactive/2016/08/29/us/politics/document-Reid-Letter-to-Comey.html>.

<sup>62</sup> Lisa Page Text Message to Andrew McCabe (Aug. 28, 2016) [FBI003984].

<sup>63</sup> IG Report at 340.

<sup>64</sup> *Id.* at 326–29.

plan concerning U.S. Presidential candidate Donald Trump and Russian hackers hampering U.S. elections as a means of distracting the public from her use of a private mail server.”<sup>65</sup>

- **Sept. 8, 2016:** Comey, DHS Secretary Jeh Johnson, and President Obama's Homeland Security Advisor Lisa Monaco brief Members of Congress about the Russian Government's attempts to interfere in the 2016 election. The briefers assure Members that the Administration had the matter under control and asked for Congress's help in reinforcing public confidence in the election.<sup>66</sup>
- **Sept. 15, 2016:** Source 2 has two consensually monitored meetings with George Papadopoulos.<sup>67</sup>
- **Mid-Sept. 2016:**
  - On behalf of a client he refused to identify, Perkins Coie partner Michael Sussman provides FBI General Counsel Jim Baker with information “that could demonstrate contacts or communications between unknown persons in Russia and unknown persons associated, or potentially associated with the Trump Organization.”<sup>68</sup>
- **Sept. 19, 2016:**
  - CFH team receives six Steele reports.<sup>69</sup>
  - Strzok texts Page: “See, this is the crap that aggravates me: I specifically DIDN’T tell Bill about the new Intel we got on Fri on CH so that Jon [Moffa] could present it. Then Jon runs in this morning and does it without me. Whatever...”<sup>70</sup>
- **Sept. 21, 2016:** At the direction of Fusion GPS, Christopher Steele briefs the *N.Y. Times*, *Washington Post*, *New Yorker*, *Yahoo! News*, and *CNN*.<sup>71</sup>
  - A *Yahoo! News* reporter “‘present for a Steele September 2016 press briefing [said] Steele told him at the meeting that he had provided his election reporting to the FBI and that there were ‘people in the [FBI] taking this very seriously.’”<sup>72</sup>

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<sup>65</sup> Letter from John Ratcliffe, Dir. of Nat’l Intelligence, to Sen. Lindsey Graham, Chairman, S. Comm. on the Judiciary (Sept. 29, 2020), [https://www.judiciary.senate.gov/imo/media/doc/09-29-20\\_Letter%20to%20Sen.%20Graham\\_Declassification%20of%20FBI's%20Crossfire%20Hurricane%20Investigations\\_20-00912\\_U\\_SIGNED-FINAL.pdf](https://www.judiciary.senate.gov/imo/media/doc/09-29-20_Letter%20to%20Sen.%20Graham_Declassification%20of%20FBI's%20Crossfire%20Hurricane%20Investigations_20-00912_U_SIGNED-FINAL.pdf).

<sup>66</sup> Briefing from the Dep’t of Homeland Sec. and Fed. Bureau of Investigation to Members of Congress on Cybersecurity (Sept. 8, 2016); *see also* Letter from Sen. Ron Johnson, Chairman, S. Comm. on Homeland Sec. & Gov’t Aff., to Kirstjen Nielsen, Sec’y of Homeland Sec. (June 6, 2018), <https://www.hsgac.senate.gov/imo/media/doc/2018%2006%20RHI%20to%20DHS%20re%20Election%20Security%20Briefing.pdf>.

<sup>67</sup> IG Report at 330–33.

<sup>68</sup> Tr. of Interview at 61, H. Permanent Select Comm. on Intelligence Interview of Michael Sussman (Dec. 18, 2017), [https://www.dni.gov/files/HPSCI\\_Transcripts/2020-05-04-Michael\\_Sussman-MTR\\_Redacted.pdf](https://www.dni.gov/files/HPSCI_Transcripts/2020-05-04-Michael_Sussman-MTR_Redacted.pdf).

<sup>69</sup> IG Report at 101.

<sup>70</sup> Text Message from Peter Strzok to Lisa Page (September 19, 2016) [DOJ-PROD-0000259].

<sup>71</sup> *Aven*, [2020] EWHC 1812 (QB) [164]; IG Report 104–05.

<sup>72</sup> IG Report at 105 n.235.

- **Sept. 23, 2016:** *Yahoo! News* publishes story about Carter Page similar to Steele's reporting.<sup>73</sup>
- **Sept. 26, 2016:** Carter Page ends association with the Trump campaign.<sup>74</sup>
- **Sept. 27, 2016:** Assistant Secretary of State Victoria Nuland tells Deputy Assistant Secretary Kathleen Kavalec that an organization named "Orbis" had information related to Donald Trump and his business and activities in Moscow.<sup>75</sup>
- **Sept. 29, 2016:** Kavalec sends an email to FBI agent Stephen Laycock about "the issue" they discussed to confirm that the source of the information is from "Orbis Security," and that State Department officials were aware that the source planned to meet with the FBI on October 3, 2016.<sup>76</sup>
- **Sept. 30, 2016:**
  - Strzok emails that Victoria Nuland said she received a written report from the source and, after speaking with Kavalec, an FBI official clarifies that a State Department official [Jonathan Winer] took notes from a meeting with Steele and provided to them to Nuland, but he did not feel comfortable sharing them with the FBI.<sup>77</sup>
  - Strzok texts Lisa Page: "Hey I'm almost home, sorry. Remind me tomorrow what victoria nuland said."<sup>78</sup>
- **Early Oct. 2016:**
  - A document circulates among the FBI's CFH team and supervisors identifying one of Steele's sub-sources ("Person 1") as "rumored to be a former KGB/SVR officer."<sup>79</sup>
  - "Person 1" was the subject of an open FBI counterintelligence investigation.<sup>80</sup>
  - Papadopoulos is dismissed from Trump campaign.<sup>81</sup>
- **Oct. 3, 2016:** FBI's CFH team meets with Christopher Steele.<sup>82</sup>

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<sup>73</sup> *Id.* at 5.

<sup>74</sup> *Id.* at 2.

<sup>75</sup> Letter from Mary Elizabeth Taylor, Ass't Sec., Bureau of Leg. Affairs, U.S. Dep't of State, to Sen. Ron Johnson, S. Comm. on Homeland Sec. & Gov't Aff, and Sen. Charles Grassley, Chairman, S. Comm. on Finance. (Jun. 7, 2019) (on file with Comms.).

<sup>76</sup> Email from Kathleen Kavalec to Stephen Laycock (Sept. 29, 2016) [FBI002651]

<sup>77</sup> Various Emails [FBI002641-44].

<sup>78</sup> Text Message from Peter Strzok to Lisa Page (Sept. 30, 2016) [DOJ-PROD-0000273].

<sup>79</sup> IG Report 164 n.302 (declassified).

<sup>80</sup> *Id.* at 164; *see also id.* n.303.

<sup>81</sup> *Id.* at 2.

<sup>82</sup> S. REP. NO. 116-290, vol. 5, at 849.



- **Oct. 7, 2016:**
  - DNI and DHS attribute DNC hack to Russia.<sup>83</sup>
  - Deputy Assistant Secretary of State Kathleen Kavalec, on behalf of Assistant Secretary Victoria Nuland, emails FBI to ask how the CFH team’s meeting with Steele went.<sup>84</sup>
  
- **Oct. 11, 2016:**
  - DOJ/FBI
    - After being asked three times by DOJ attorney Stu Evans, FBI responds that Steele “had been paid to develop political opposition research”,<sup>85</sup> DOJ holds FISA application on Carter Page because of concerns of bias that may need to be disclosed to the court.<sup>86</sup>
    - Strzok advises Lisa Page that “support from McCabe might be necessary to move the FISA application forward.”<sup>87</sup>
    - Strzok texts Page: “Currently fighting with Stu [Evans] for this FISA.”<sup>88</sup>
  - State
    - Christopher Steele meets with State Department official Kathleen Kavalec, which was arranged by State Department official Jonathan Winer.<sup>89</sup>
    - Steele tells Kavalec his investigation is “at the behest of an institution he declined to identify that had been hacked” and that the “institution . . . is keen to see this information come to light prior to November 8.”<sup>90</sup>
    - Steele tells Kavalec, among other things, about a link between the Trump campaign and Alfa Bank.<sup>91</sup>
    - Victoria Nuland asks Kathleen Kavalec to send the information from the meeting to the FBI, and she also told Ms. Kavalec that the information would be shared with Secretary Kerry.<sup>92</sup>
    - Shortly after the meeting with FBI, Kavalec tells her FBI contact that Steele incorrectly reported to her that Russia had a consulate in Miami.<sup>93</sup>
    - The FBI never interviewed Kavalec or requested her notes.<sup>94</sup>

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<sup>83</sup> David E. Sanger and Charlie Savage, *U.S. Says Russia Directed Hacks to Influence Elections*, N.Y. TIMES, Oct. 7, 2016, <https://www.nytimes.com/2016/10/08/us/politics/us-formally-accuses-russia-of-stealing-dnc-emails.html>.

<sup>84</sup> Email from Kathleen Kavalec to Stephen Laycock (Oct. 7, 2016) [FBI002646].

<sup>85</sup> IG Report at 136.

<sup>86</sup> *Id.*

<sup>87</sup> *Id.* at 137.

<sup>88</sup> *Id.*

<sup>89</sup> Letter from Mary Elizabeth Taylor, Ass’t Sec., Bureau of Leg. Aff., U.S. Dep’t of State, to Sen. Ron Johnson, S. Comm. on Homeland Sec. & Gov’t Aff. (Jun. 7, 2019) (on file with Comm).

<sup>90</sup> IG Report at 119.

<sup>91</sup> *Id.*

<sup>92</sup> Letter from Mary Elizabeth Taylor, Ass’t Sec., Bureau of Leg. Aff., U.S. Dep’t of State, to Sen. Ron Johnson, S. Comm. on Homeland Sec. & Gov’t Aff. (Jun. 7, 2019) (on file with Comm).

<sup>93</sup> IG Report at 118.

<sup>94</sup> *Id.* at 119.

- Christopher Steele meets with reporters from the *N.Y. Times*, *Washington Post*, and *Yahoo! News*<sup>95</sup> at the behest of his client, Fusion GPS.<sup>96</sup>
- **Oct. 12, 2016:** Comey and McCabe are briefed by Bill Priestap, Strzok, Lisa Page, and others about Evans’s concerns of source bias; Comey and McCabe both were “‘supportive’ of moving forward despite those concerns.”<sup>97</sup>
  - Lisa Page texts McCabe: “I communicated you and boss’s green light to Stu earlier. . . . If I have not heard back from Stu in an hour, I will invoke your name to say you want to know where things are[.]”<sup>98</sup>
- **Oct. 13, 2016:**
  - FBI Transnational Organized Crime Section Chief informs DOJ Attorney Bruce Ohr that FBI counterintelligence agents were examining Steele’s reporting.<sup>99</sup>
  - State Department official Kathleen Kavalec emails an FBI counterintelligence section chief a document she received from Jonathan Winer discussing allegations about a link between Alfa Bank and the Trump campaign.<sup>100</sup>
  - One FBI official sends a message to another FBI official, “I’m tellying [sic] man, if this thing ever gets FOIA’d, there are going to be some tough questions asked and a great deal of those will be related to Brian having a scope way outside the boundaries of logic. [REDACTED] is one of the worst offenders of the rabbit holes and conspiracy theories[.] This guy traveled with that guy, who put down 3<sup>rd</sup> guy as his visa sponsor. 3<sup>rd</sup> guy lives near a navy base, therefore . . .”<sup>101</sup>
- **Oct. 14, 2016:** Text message to McCabe from an unknown individual: “Just called. Apparently the DAG [Yates] wants to be there, and WH wants DOJ to host. So we are setting that up now. We will very much need to get [REDACTED] view before we meet with her. Better, have him weigh in with her before the meeting. We need to speak with one voice, if that is in fact the case.”<sup>102</sup>
- **Oct. 17, 2016:** Source 2’s second consensually monitored meeting with Carter Page.<sup>103</sup>
- **Oct. 18, 2016:**
  - Steele emails DOJ Attorney Bruce Ohr about a “quite urgent” matter to discuss.<sup>104</sup>

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<sup>95</sup> Tr. of Testimony at 8, *Aven*, [2020] EWHC 1812 (QB), Testimony of Christopher Steele (July 23, 2020).

<sup>96</sup> Glenn Simpson testified to Congress that he and Christopher Steele told journalists that Steele was working with the FBI. See Tr. of Interview at 226, S. Comm. on the Judiciary Interview with Glenn Simpson (Aug. 22, 2017), <https://apps.washingtonpost.com/g/documents/politics/read-the-full-transcript-of-glenn-simpsons-senate-testimony/2700/>.

<sup>97</sup> IG Report at 139.

<sup>98</sup> *Id.* at 141.

<sup>99</sup> *Id.* at 275–76.

<sup>100</sup> *Id.* at 119.

<sup>101</sup> Def.’s Third Supp. in Support of Dismissal at 3, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>102</sup> Text Message to Andrew McCabe from unknown individual (Oct. 14, 2016) [FBI001012].

<sup>103</sup> IG Report at 320–23.

<sup>104</sup> *Id.* at 276.

- Ohr meets with McCabe and Lisa Page. He explains Steele’s connection to Glenn Simpson and Ohr’s wife, and they tell Ohr to contact the FBI if he hears from Steele again.<sup>105</sup>
- Either McCabe or Lisa Page briefs Strzok about their meeting with Ohr.<sup>106</sup>
- State Department official Jonathan Winer, who has “a business association” with Christopher Steele, provides Steele with a memo prepared by Cody Shearer (brother-in-law to Strobe Talbott) that Winer received from Sidney Blumenthal.<sup>107</sup>
- An unnamed individual texts FBI Deputy Assistant Director for Counterintelligence Jennifer Boone, “Tell Bill [most likely referring to Bill Priestap] that unlike the Russian election issue, this is REAL.”<sup>108</sup>
- **Oct. 19, 2016:** Christopher Steele provides the FBI with the Shearer memorandum, titled “FSB Interview,” and explains that it is “potentially significant” because “the reporting is remarkably similar to our own, albeit from a completely different sourcing chain, and therefore could be important collateral, especially on the reported Ritz Carlton incident in 2013.”<sup>109</sup>
  - Steele describes Shearer’s sub-source as “a Turkish businessman with strong Russian, including FSB links,” and Blumenthal as “a friend of the Clintons.”<sup>110</sup>
- **Oct. 21, 2016:** FISC approves FISA warrant for Carter Page following FBI application approved by Deputy Attorney General Sally Yates,<sup>111</sup> including electronic and physical searches,<sup>112</sup> as well as the authorization for overseas surveillance of Page.<sup>113</sup>
- **Oct. 30, 2016:** Senator Reid sends follow-up letter to Director Comey threatening him with a Hatch Act violation for publicly stating that Hillary Clinton was under investigation before the election, while urging Comey to investigate and make public prior to the election information the FBI had about the “close ties and coordination between Donald Trump, his top advisors, and the Russian government.”<sup>114</sup>
- **Late October 2016:**
  - Perkins Coie partner Michael Sussman shares information with reporters from the *N.Y. Times* (Eric Lichtblau), *Washington Post* (Ellen Nakashima), and *Slate*

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<sup>105</sup> *Id.* at 276–77.

<sup>106</sup> *Id.* at 278.

<sup>107</sup> FBI Form FD-1023 and Attachment (Oct. 19, 2016) [FBI002653–58].

<sup>108</sup> Text Message to Jennifer Boone from unknown individual (Oct. 18, 2016) [DOJ-HSGAC20201030-000016].

<sup>109</sup> IG Report at 116; FBI Form FD-1023 and Attachment [FBI002653–58]

<sup>110</sup> *Id.*

<sup>111</sup> IG Report at 6, 74.

<sup>112</sup> *See, e.g., id.* at 198 n.354, 231 n.379 (declassified).

<sup>113</sup> *Id.* at 156 n.293 (declassified).

<sup>114</sup> Letter from Sen. Harry Reid, Min. Leader, to James Comey, FBI Dir. (Oct. 30, 2016), <https://static.politico.com/2e/1a/5bb86d684289bd506452c43b1065/reid-letter-to-comey.pdf>

(Franklin Foer), and this information was later reported in news articles in late October and early November 2016.<sup>115</sup>

- **Oct. 31, 2016:** *Mother Jones* publishes article based on information from Steele.<sup>116</sup>
- **Nov. 1, 2016:**
  - FBI terminates relationship with Steele.<sup>117</sup>
  - Lisa Page texts McCabe: “Mother Jones. Re western intel source reporting on trump. ... And the alphabank story is in slate.”<sup>118</sup>
- **Early November 2016:** Christopher Steele provides his election reporting to Strobe Talbott, who told Steele he was in contact with Victoria Nuland and Secretary Kerry on these matters.<sup>119</sup>
- **Nov. 6, 2016:** The CFH team receives another Steele election report that mentions Alfa Bank from FBI General Counsel James Baker, who received it from a reporter at *Mother Jones*.<sup>120</sup>
- **Nov. 8, 2016:**
  - Trump is elected President.
  - An FBI official sends a message to another FBI official: “I went an [sic] joined the ops pow wow....looks like next Friday is the end . . . we have some loose ends to tie up, and we all need to meet to discuss what to do with each case (**he said shut down Razor**) . . . [Redacted] was silent though, so who knows what he will want . . . **so glad they’re closing Razor**[.]”<sup>121</sup>
- **Nov. 9, 2016:** FBI attorney instant messages another FBI employee: “I am so stressed about what I could have done differently...I just can’t imagine the systematic disassembly of the progress we made over the last 8 years.”<sup>122</sup>
- **Nov. 10, 2016:** In a meeting in the Oval Office, President Obama reportedly warns President-elect Trump about hiring Flynn.<sup>123</sup>

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<sup>115</sup> Tr. of Interview at 69–70, H. Permanent Select Comm. on Intelligence Interview of Michael Sussman (Dec. 18, 2017), [https://www.dni.gov/files/HPSCI\\_Transcripts/2020-05-04-Michael\\_Sussman-MTR\\_Redacted.pdf](https://www.dni.gov/files/HPSCI_Transcripts/2020-05-04-Michael_Sussman-MTR_Redacted.pdf).

<sup>116</sup> *Id.* at 6.

<sup>117</sup> IG Report at 173.

<sup>118</sup> Text Message from Lisa Page to Andrew McCabe (Nov. 1, 2016) [FBI04011].

<sup>119</sup> *Aven*, [2020] EWHC 1812 (QB) [77].

<sup>120</sup> IG Report at 119 n.259.

<sup>121</sup> Dep’t of Justice Production at DOJSCO - 700023509, contained within Def.’s Third Supp. in Support of Dismissal, Ex. A, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-1, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>122</sup> IG Report at 256 n.400.

<sup>123</sup> Michael Shear, *Obama Warned Trump About Hiring Flynn*, Officials Say, N.Y. TIMES, May 8, 2017, <https://www.nytimes.com/2017/05/08/us/politics/obama-flynn-trump.html>.

- **Nov. 17, 2016:**
  - FBI officially closes Steele as a source for cause.<sup>124</sup>  
Strzok texts Lisa Page about the possibility of “develop[ing] potential relationships” at a November 2016 FBI briefing for the Trump presidential transition team staff.<sup>125</sup> They discuss sending someone who can “assess . . . any new[] Q[uestion]s, or different demeanor.”<sup>126</sup>
- **Nov. 18, 2016:** Trump announces that Flynn will serve as national security advisor.<sup>127</sup>
- **Nov. 21, 2016:**
  - Bruce Ohr meets with Lisa Page, Strzok, and other FBI officials to discuss “Steele’s background and reliability as a source and to identify his source network.”<sup>128</sup>
    - Ohr tells FBI agents that Steele was “[d]esperate Trump not get elected-passionate about that.”
    - Ohr tells FBI agents that Steele had told Ohr that the Alfa Bank server was a link to the Trump campaign.<sup>129</sup>
  - An FBI official sends a message to another FBI official: “the decision to [national security letter] finances for razor bought him time.”<sup>130</sup>
- **Nov. 23, 2016:** During a discussion of how much a subject was paid to work on the Trump campaign, an FBI colleague instant messages an FBI attorney, “Is it making you rethink your commitment to the Trump administration?” The FBI attorney responds, “Hell no,” and “Viva le resistance.”<sup>131</sup>
- **Nov. 28, 2016:** McCain Institute staffer meets with Steele in Europe. Staffer later obtains the Steele reports from Glenn Simpson.<sup>132</sup>
- **Nov. 30, 2016:** UN Ambassador Samantha Power asks to unmask the identity of a U.S. person in intelligence reporting that turns out to be Flynn.<sup>133</sup>

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<sup>124</sup> IG Report at 6.

<sup>125</sup> Letter from Sen. Ron Johnson and Sen. Chuck Grassley to William P. Barr, Att’y Gen., U.S. Dep’t of Justice (Apr. 25, 2019) (on file with Comm.).

<sup>126</sup> *Id.*

<sup>127</sup> Eric Bradner et al., *Trump offers Flynn job of national security advisor*, CNN, Nov. 18, 2016, <https://edition.cnn.com/2016/11/17/politics/trump-offers-flynn-job-of-national-security-adviser>.

<sup>128</sup> IG Report at 279.

<sup>129</sup> *Id.* at 119 n.259.

<sup>130</sup> Dep’t of Justice Production at DOJSCO - 700023510, contained within Def.’s Third Supp. in Support of Dismissal, Ex. A, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-1, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>131</sup> IG Report at 256 n.400.

<sup>132</sup> *Id.* at 175; Gregg Re, *McCain associate shared unverified Steele dossier with BuzzFeed, court filing says*, FOX NEWS, Dec. 20, 2018, <https://www.foxnews.com/politics/mccain-associate-gave-unverified-steele-dossier-to-buzzfeed-court-filing-says>.

<sup>133</sup> Letter from Richard Grenell, Acting Dir. of Nat’l Intelligence, to Sen. Ron Johnson, Chairman, S. Comm. on Homeland Sec. and Gov’t Aff., and Sen. Charles Grassley, Chairman, S. Comm. on Fin. (May 13, 2020), <https://>

- **Nov. 2016:**
  - Steele’s former employer provides the FBI with feedback about Steele, some of which was positive and some of which was negative.<sup>134</sup> FBI Assistant Director Priestap “may have made a commitment to Steele’s former employer not to document the former employer’s views on Steele as a condition for obtaining the information.”<sup>135</sup>
  - Steele’s former employer tells the FBI that Steele served in a “moderately senior” position, not a “high-ranking” position that Steele suggested to the FBI in October 2016.<sup>136</sup>
  
- **Dec. 2016**
  - The FBI’s CFH team identifies Steele’s Primary Sub-source (PSS) and learns that the PSS was the subject of an FBI counter-intelligence investigation from May 2009 until March 2011. In July 2010, the FBI initiated a request for a FISA warrant for the PSS but did not pursue the request after the PSS departed the United States in September 2010.<sup>137</sup>
  
- **Dec. 2, 2016:** Samantha Power and DNI James Clapper ask to unmask the identity of a U.S. person in intelligence reporting that turns out to be Flynn.<sup>138</sup>
  
- **Dec. 5, 2016:** FBI officials exchange messages about two outstanding National Security Letters (NSLs) related to the Flynn investigation, and state that the decision to pursue NSLs “now it is not” a “logical investigative step.” They write, “**we put out traces, tripwires to community and nothing . . . bingo . . . so whats [sic] an nsl going to do – no content . . . this is a nightmare[.]**”<sup>139</sup>
  
- **Dec. 7, 2016:**
  - Samantha Power asks to unmask a U.S. person in intelligence reporting that turns out to be Flynn.<sup>140</sup>
  - *Associated Press* article, “Why Donald Trump’s NSA Pick Is Scaring Some National Security Experts.”<sup>141</sup>

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[www.hsgac.senate.gov/imo/media/doc/2020-05-13%20ODNI%20to%20CEG%20RHJ%20\(Unmasking\).pdf](http://www.hsgac.senate.gov/imo/media/doc/2020-05-13%20ODNI%20to%20CEG%20RHJ%20(Unmasking).pdf)  
[hereinafter Unmasking Request].

<sup>134</sup> IG Report at 182–83.

<sup>135</sup> *Id.* at 183 n.328 (declassified).

<sup>136</sup> *Id.* at 160 n.296 (declassified).

<sup>137</sup> Letter from William Barr, Att’y Gen., U.S. Dep’t of Justice, to Sen. Lindsey Graham, Chairman, S. Comm. on the Judiciary (Sept. 24, 2020).

<sup>138</sup> Unmasking Request.

<sup>139</sup> Dep’t of Justice Production at DOJSCO - 700023511, contained within Def.’s Third Supp. in Support of Dismissal, Ex. A, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-1, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020> (emphasis added).

<sup>140</sup> Unmasking Request.

<sup>141</sup> *Why Donald Trump’s NSA Pick Is Scaring Some National Security Experts*, ASSOCIATED PRESS, Dec. 7, 2016, <https://fortune.com/2016/12/07/donal-trump-michael-flynn-national-security-advisor/>.

- **Dec. 9, 2016:**
  - Senator McCain provides Comey with sixteen Steele election reports (including five reports that Steele had not given the FBI).<sup>142</sup>
  - *Washington Post* article, “Secret CIA assessment says Russia was trying to help Trump win White House.”<sup>143</sup>
- **Dec. 10, 2016:** Ohr receives thumb drive from Simpson containing Steele’s reports.<sup>144</sup>
  - Ohr gives thumb drive to the FBI.<sup>145</sup>
  - Thumb drive contains all but one of the reports Senator McCain provided Comey.<sup>146</sup>
- **Dec. 14, 2016:** Samantha Power, John Brennan, Treasury Secretary Jacob Lew, and five other Treasury Department officials ask to unmask a U.S. person in intelligence reporting that turns out to be Flynn.<sup>147</sup>
- **Dec. 15, 2016:**
  - James Comey, John Brennan, and several other U.S. officials ask to unmask a U.S. person in intelligence reporting who turns out to be Flynn.<sup>148</sup>
  - Strzok texts Lisa Page, “Think our sisters have begun leaking like mad. Scorned and worried and political, they’re kicking in to overdrive.”<sup>149</sup>
  - Source 2’s third consensually monitored meeting with Carter Page.<sup>150</sup>
- **Dec. 16, 2016:**
  - McCabe insists that Steele reporting is included in the Intelligence Community Assessment (ICA) about Russian interference in the 2016 election;<sup>151</sup> Comey informs DNI that FBI will submit the Steele reporting to the assessment.<sup>152</sup>
    - The Intelligence Section Chief later said to the OIG, “The minute we put the [Steele election reporting] in there, it goes from what you’d expect the FBI to be collecting in a counterintelligence context to direct allegations about collusion with the Trump campaign.”<sup>153</sup>
    - CIA viewed Steele reporting as “not completely vetted” and “internet rumor.”<sup>154</sup>

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<sup>142</sup> IG Report at 175.

<sup>143</sup> Adam Entous et al., *Secret CIA assessment says Russia was trying to help Trump win White House*, WASH. POST, Dec. 9, 2016, [https://www.washingtonpost.com/world/national-security/obama-orders-review-of-russian-hacking-during-presidential-campaign/2016/12/09/31d6b300-be2a-11e6-94ac-3d324840106c\\_story.html](https://www.washingtonpost.com/world/national-security/obama-orders-review-of-russian-hacking-during-presidential-campaign/2016/12/09/31d6b300-be2a-11e6-94ac-3d324840106c_story.html).

<sup>144</sup> IG Report at 176.

<sup>145</sup> *Id.*

<sup>146</sup> *Id.*

<sup>147</sup> Unmasking Request.

<sup>148</sup> *Id.*

<sup>149</sup> Text Message from Peter Strzok to Lisa Page (Dec. 15, 2016), Strzok-Page Texts Second Production at 5 (on file with Comms.).

<sup>150</sup> IG Report at 323–25.

<sup>151</sup> *Id.* at 177.

<sup>152</sup> *Id.* at 178.

<sup>153</sup> *Id.*

<sup>154</sup> *Id.*

- *Washington Post* story, “FBI in agreement with CIA that Russia aimed to help Trump win White House.”<sup>155</sup>
- Strzok texts Lisa Page: “And just talked with [FBI Assistant Director for Public Affairs Michael] Kortan, he was just on with editor of WP.” Page responds: “They going to change it?” Strzok says: “Not certain. Sounds like something. Mike [Kortan] was worried, like me, that the tone was WE [FBI] had shifted our position. Because the agency plays this game better than we do. Gotta say the new WP article angle really infuriates me – and Kortan echoed it – the notion that somehow we’ve come around to the agency’s position. The point now is there were a variety of motives. That’s [sic] been our position all along. Only the agency’s has changed. Why is that so hard to see? The re-write headline is still wrong - “FBI in agreement with CIA that Russia aimed to help Trump win White house.”<sup>156</sup>
- **Dec. 19, 2016:** Strzok texts Lisa Page: “I hope this upcoming presidency doesn’t fill my years with regret, wonderwishing [sic] what we might have done differently.”<sup>157</sup>
- **Dec. 20, 2016:**
  - Bruce Ohr provides FBI with a thumb drive of reports and work that Nellie Ohr compiled for Fusion GPS.<sup>158</sup>
  - Strzok texts Lisa Page: “Remind me [REDACTED] met with Bruce and got.[sic]more stuff today.” Page responded: “Yeah, lots to read, but it all stressed me Out [sic] too much.”<sup>159</sup>
- **Dec. 22, 2016:**
  - Lisa Page texts Strzok: “The election stuff makes me want to cry.” Strzok responds, “I know. Me too. And I don’t see it getting better...” Page says: “As you said last night, I’m really scared for our country. And there’s practically no one I can talk to about it.”<sup>160</sup>
  - Strzok texts Lisa Page: “Where it says we ‘changed’ our assessment to the Russians helping T.” Page responds, “Yup. Infuriating. The hrc stuff was accurate, the Russia stuff not really at all.” Strzok responds, “Again. Agency’s pr masterful, ours, meh. Yet THEY’RE resisting putting the C stuff in. Maybe there’s a lesson in there.” Page responds, “What the lesson?” Strzok responds,

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<sup>155</sup> Adam Entous and Ellen Nakashima, *FBI in agreement with CIA that Russia aimed to help Trump win White House*, WASH. POST, Dec. 16, 2016, [https://www.washingtonpost.com/politics/clinton-blames-putins-personal-grudge-against-her-for-election-interference/2016/12/16/12f36250-c3be-11e6-8422-eac61c0ef74d\\_story.html](https://www.washingtonpost.com/politics/clinton-blames-putins-personal-grudge-against-her-for-election-interference/2016/12/16/12f36250-c3be-11e6-8422-eac61c0ef74d_story.html).

<sup>156</sup> Text message from Peter Strzok to Lisa Page (Dec. 16, 2016), Strzok-Page Texts Second Production at 6–7 (on file with Comms.).

<sup>157</sup> Text message from Peter Strzok to Lisa Page (Dec. 19, 2016), Strzok-Page Texts Second Production at 12 (on file with Comms.).

<sup>158</sup> Email from unknown FBI official to various FBI officials (Dec. 20, 2016) [DOJ-HSGAC20200728-000328].

<sup>159</sup> Text messages between Peter Strzok and Lisa Page (Dec. 20, 2016), Strzok-Page Texts Second Production at 15 (on file with Comms.).

<sup>160</sup> Text messages between Peter Strzok and Lisa Page (Dec. 22, 2016), Strzok-Page Texts Second Production at 17 (on file with Comms.).



“Play the political game better. I don’t know. We seem to irritate everyone at every turn.”<sup>161</sup>

- Phone call between Flynn and Russian Ambassador Sergey Kislyak.<sup>162</sup>
- **Dec. 23, 2016:**
  - Samantha Power asks to unmask a U.S. person in intelligence reporting who turns out to be Flynn.<sup>163</sup>
- **Dec. 28, 2016:**
  - McCabe emails ODNI Principal Deputy Director objecting to CIA’s proposal to present Steele information in an appendix to the ICA.<sup>164</sup>
  - James Clapper asks to unmask a U.S. person in intelligence reporting that turns out to be Flynn.<sup>165</sup>
- **Dec. 29, 2016:**
  - President Obama announces that the U.S. is “ejecting 35 suspected Russian intelligence operatives from the United States and imposing sanctions on Russia’s two leading intelligence services.”<sup>166</sup>
  - Phone call between Flynn and Russian Ambassador Kislyak.<sup>167</sup>
- **Late Dec. 2016**
  - According to DOJ official Bruce Ohr, Glenn Simpson “assessed” that one of Steele’s sub-sources (“Person 1”) was a Russian Intelligence Services officer.<sup>168</sup>
- **Early Jan. 2017:** ICA is completed and includes a short summary and assessment of the Steele election reporting as an appendix.<sup>169</sup>

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<sup>161</sup> Text messages between Peter Strzok and Lisa Page (Dec. 22, 2016), Strzok-Page Texts Second Production at 18 (on file with Comms.).

<sup>162</sup> Tr. of Phone Call at 3–6, attached to Letter from John Ratcliffe, Dir. of Nat’l Intelligence, to Sen. Charles E. Grassley, Chairman, S. Comm. on Fin., and Sen. Ron Johnson, Chairman, S. Comm. on Homeland Sec. & Gov’t Aff. (May 29, 2020), <https://www.grassley.senate.gov/sites/default/files/2020-05-29%20ODNI%20to%20CEG%20RHJ%20%28Flynn%20Transcripts%29.pdf>.

<sup>163</sup> Unmasking Request.

<sup>164</sup> IG Report at 178–79.

<sup>165</sup> Unmasking Request.

<sup>166</sup> David Sanger, *Obama Strikes Back at Russia for Election Hacking*, N.Y. TIMES, Dec. 29, 2016, <https://www.nytimes.com/2016/12/29/us/politics/russia-election-hacking-sanctions.html>.

<sup>167</sup> Tr. of Phone Call at 7–12, attached to Letter from John Ratcliffe, Dir. of Nat’l Intelligence, to Sen. Charles E. Grassley, Chairman, S. Comm. on Fin., and Sen. Ron Johnson, Chairman, S. Comm. on Homeland Sec. & Gov’t Aff. (May 29, 2020), <https://www.grassley.senate.gov/sites/default/files/2020-05-29%20ODNI%20to%20CEG%20RHJ%20%28Flynn%20Transcripts%29.pdf>; see also David Ignatius, *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).

<sup>168</sup> *Id.* at 164 n.302.

<sup>169</sup> *Id.* at 179; Letter from John Ratcliffe, Dir. of Nat’l Intelligence, to Sen. Charles E. Grassley, Chairman, S. Comm. on Fin., and Sen. Ron Johnson, Chairman, S. Comm. on Homeland Sec. & Gov’t Aff. (June 10, 2020),

- **Jan. 3, 2017:**
  - Strzok texts Lisa Page: “Our material in the report is much better now. Don’t like an annex, but is what it is. Did you follow the drama over the P[residential] D[aily] B[riefing] last week?”
    - Page: “Yup. Don’t know how it ended though.”
    - Strzok: “They didn’t include any of it and Bill didn’t want to dissent.”
    - Page: “Wow. Bill should make sure Andy knows about that, since he was consulted numerous times about whether to include the reporting.”<sup>170</sup>
  - Strzok texts Page: “[Bill Priestap], like us, is concerned with over sharing. Doesn’t want Clapper giving C[rossfire]R[azor] cuts to WH. All political, just shows our hand and potentially makes enemies.” Page responds: “Yeah, but keep in mind we were going to put that in the doc on friday, with potentially larger distribution than just the dni.” Strzok says, “The question is should we, particularly to the entirety of the lame duck usic with partisan axes to grind.”<sup>171</sup>
- **Jan 4, 2017:**
  - FBI had drafted a “closing communication” for Crossfire Razor. Document states, “[n]o derogatory information was identified in FBI holdings [on Flynn].”<sup>172</sup>
    - 2:22 PM: Strzok confirms that the Flynn investigation is still open and instructs the FBI case manager to “keep it open for now.” Strzok says that the “7th floor [is] involved.”<sup>173</sup>
    - 11:47 PM: Strzok texts Lisa Page, “And if you’re all talking plan for Razor, I have very relevant new info to that discussion.”<sup>174</sup>
- **Jan. 5, 2017:**
  - Denis McDonough, Chief of Staff to President Obama, asks to unmask a U.S. person in intelligence reporting who turns out to be Flynn.<sup>175</sup>
  - Clapper, NSA Director Adm. Michael Rogers, Brennan, and Comey brief the ICA report to Obama and his national security team, including Vice President Biden.<sup>176</sup>

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<https://www.hsgac.senate.gov/imo/media/doc/2020-06-10%20ODNI%20to%20CEG,%20RJ%20-%20ICA%20Annex.pdf>.

<sup>170</sup> Text messages between Peter Strzok and Lisa Page (Jan. 3, 2017), Strzok-Page Texts Second Production at 23 (on file with Comms.).

<sup>171</sup> *Id.*

<sup>172</sup> Gov’t’s Mot. to Dismiss at 13, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. May 7, 2020), ECF No. 198, <https://int.nyt.com/data/documenthelper/6936-michael-flynn-motion-to-dismiss/fa06f5e13a0ec71843b6/optimized/full.pdf>.

<sup>173</sup> Gov’t Mot. to Dismiss, Ex. 7 at 2, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. May 7, 2020), ECF No. 198-8, <https://int.nyt.com/data/documenthelper/6936-michael-flynn-motion-to-dismiss/fa06f5e13a0ec71843b6/optimized/full.pdf>.

<sup>174</sup> Dep’t of Justice Production at DOJSCO - 700023521, contained within Def.’s Third Supp. in Support of Dismissal, Ex. E, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-5, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>175</sup> Unmasking Request.

<sup>176</sup> IG Report at 180.

- Following the briefing, Obama asks Yates and Comey to stay behind and states that he had “learned of the information about Flynn” including Flynn’s conversation with Kislyak about sanctions.<sup>177</sup>
  - Obama then allegedly “specified he did not want any additional information on the matter, but was seeking information on whether the White House should be treating Flynn any differently, given the information.”<sup>178</sup>
  - During this conversation, “Yates recalled Comey mentioning the Logan Act.”<sup>179</sup>
  - Notes memorializing the meeting also suggest that then-Vice President Biden may have directly suggested using the Logan Act to investigate Flynn.<sup>180</sup>
- Messages exchanged between FBI officials:
  - “So razor is going to stay open???”
  - “yep”<sup>181</sup>
- **Jan. 6, 2017:**
  - Clapper, Brennan, Rogers, and Comey brief Trump on ICA at Trump Tower; after the briefing, pursuant to Clapper’s suggestion, Comey alone briefs Trump on Steele reporting.<sup>182</sup>
  - Comey tells Trump that the “FBI did not know whether the allegations were true or false and that the FBI was not investigating them.”<sup>183</sup>
  - Congressional leadership briefed on ICA.<sup>184</sup>
- **Jan. 7, 2017:**
  - Comey memorializes his discussion with Trump and writes, “I [] executed the session exactly as I had planned.”<sup>185</sup>
  - Clapper, Principal Deputy DNI Stephanie O’Sullivan, and Deputy DNI for Intelligence Integration Michael Dempsey ask to unmask a U.S. person in

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<sup>177</sup> Gov’t Mot. to Dismiss, Ex. 4 at 2, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. May 7, 2020), ECF No. 198-5, <https://int.nyt.com/data/documenthelper/6936-michael-flynn-motion-to-dismiss/fa06f5e13a0ec71843b6/optimized/full.pdf>.

<sup>178</sup> *Id.*

<sup>179</sup> *Id.*

<sup>180</sup> Def.’s Supp. to His Consent to Gov’t Mot. to Dismiss and His Opp. to *Amicus*, Ex. 1 at 1, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (June 24, 2020), ECF No. 231-1, [https://www.courtlistener.com/recap/gov.uscourts.dcd.191592/gov.uscourts.dcd.191592.231.1\\_1.pdf](https://www.courtlistener.com/recap/gov.uscourts.dcd.191592/gov.uscourts.dcd.191592.231.1_1.pdf).

<sup>181</sup> Dep’t of Justice Production at DOJSCO - 700023513, contained within Def.’s Third Supp. in Support of Dismissal, Ex. A, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-1, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>182</sup> *Id.*; Rowan Scarborough, *How James Clapper laid bare to Trump prostitute tale in debunked dossier*, WASH. TIMES, Apr. 20, 2018, <https://www.washingtontimes.com/news/2018/apr/20/james-clapper-insisted-trump-receive-prostitute-br/>.

<sup>183</sup> IG Report at 180.

<sup>184</sup> *Id.*

<sup>185</sup> Letter from Chairman Ron Johnson, S. Comm. on Homeland Sec. & Gov’t Affairs, to FBI Dir. Christopher Wray (May 21, 2018), <https://www.hsgac.senate.gov/media/majority-media/johnson-releases-new-details-about-intel-briefing-on-steele-dossier-to-president-elect-trump->.

intelligence reporting that turns out to be Flynn.<sup>186</sup>

- **Jan. 10, 2017:**
  - *Buzzfeed* publishes Steele reports after obtaining them from McCain Institute staffer.<sup>187</sup>
  - FBI officials exchange the following messages:
    - “we all went and purchased professional liability insurance”
    - “holy crap[.] all the analysts too?”
    - “yep”
    - ...
    - “all the folks at the Agency as well.”<sup>188</sup>
- **Jan. 11, 2017:** Samantha Power asks to unmask a U.S. person in intelligence reporting that turns out to be Flynn.<sup>189</sup>
- **Jan. 12 2017:**
  - FBI’s CFH team receives intelligence reporting that part of Steele’s reporting “was part of a Russian disinformation campaign.”<sup>190</sup>
  - Vice President Joe Biden and Jacob Lew ask to unmask a U.S. person in intelligence reporting that turns out to be Flynn.<sup>191</sup>
  - FISC grants first renewal for Carter Page FISA, on an application approved by Deputy Attorney General Yates.<sup>192</sup>
- **Jan 13, 2017:** One FBI analyst writes, “FYI – **someone leaked the Flynn calls with Kislyak** to the WSJ.” A minute later, an FBI analyst clarifies that the article about Flynn was “[p]ublished this morning by Ignatius.” The FBI analysts continue to discuss: “**It’s got to be someone on the staff . . . PDB staff . . . Or WH seniors.**”<sup>193</sup>
- **Jan. 20, 2017:** Trump’s inauguration
  - The same day before leaving the White House, National Security Advisor Susan Rice sends herself an email memorializing an intelligence briefing she attended

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<sup>186</sup> Unmasking Request.

<sup>187</sup> IG Report at 176; Gregg Re, *McCain associate shared unverified Steele dossier with BuzzFeed, court filing says*, FOX NEWS, Dec. 20, 2018, <https://www.foxnews.com/politics/mccain-associate-gave-unverified-steele-dossier-to-buzzfeed-court-filing-says>.

<sup>188</sup> Dep’t of Justice Production at DOJSCO - 700023514, contained within Def.’s Third Supp. in Support of Dismissal, Ex. A, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-1, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>189</sup> Unmasking Request.

<sup>190</sup> IG Report at 195 n.350 (declassified).

<sup>191</sup> *Id.*

<sup>192</sup> *Id.* at 7, 74.

<sup>193</sup> Dep’t of Justice Production at DOJSCO - 700023516, contained within Def.’s Third Supp. in Support of Dismissal, Ex. A, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-1, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020> (emphasis added).

with Obama on January 5, 2017, that reportedly included a discussion on the Steele dossier and the FBI's investigation.<sup>194</sup>

- Rice writes that that Obama stressed that he wanted “every aspect of this issue [] handled by the Intelligence and law enforcement communities [to be done] ‘by the book.’”<sup>195</sup>
- **Jan. 21, 2017:**
  - FBI officials, including Strzok, discuss whether they need to inform anyone in the White House about their desire to speak to Flynn.
    - Strzok emails Priestap and other colleagues, “[w]e need to discuss what happens if DOJ directs us, or directly tells, VPOTUS or anyone else[.]”<sup>196</sup>
    - Strzok states, “I think it will be very difficult not to do some sort of overt step with [redacted], a defensive briefing or interview under light ‘defensive briefing’ pretext unless WH specifically directs us not to.”<sup>197</sup>
- **Jan. 22, 2017:**
  - Flynn is sworn in as national security advisor.<sup>198</sup>
  - Regarding who to notify about speaking with Flynn, an FBI official emails Strzok and Lisa Page, “if we usually tell the WH, then I think we should do what we would normally do.”<sup>199</sup>
- **Jan 23, 2017:**
  - Strzok texts Lisa Page, “A one-hour brief to Flynn is more important than anything Andy [McCabe] could do in London this week.”<sup>200</sup>
  - Strzok texts Page about conversations between Priestap and McCabe, “[Priestap] wanted to know why we had to go aggressively doing these things, openly.”<sup>201</sup>

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<sup>194</sup> Letter from Sen. Charles E. Grassley, S. Comm. on Fin. and Sen. Lindsey O. Graham, S. Comm. on the Judiciary, to Amb. Susan Rice (Feb. 8, 2018), [https://www.judiciary.senate.gov/imo/media/doc/2018-02-08%20CEG%20LG%20to%20Rice%20\(Russia%20Investigation%20Email\).pdf](https://www.judiciary.senate.gov/imo/media/doc/2018-02-08%20CEG%20LG%20to%20Rice%20(Russia%20Investigation%20Email).pdf). After Chairman Grassley (May 12, 2020) and Chairman Johnson (May 18, 2020) renewed requests that the Rice email be declassified in full, they received and made public a fully declassified version of that email on May 19, 2020. Press Release, Sen. Charles Grassley and Sen. Ron Johnson, Rice's Inauguration Day 'Note to File' in Final Hours of Obama Admin Declassified (May 19, 2020), <https://www.grassley.senate.gov/news/news-releases/rice-s-inauguration-day-note-file-final-hours-obama-admin-declassified>.

<sup>195</sup> *Id.*

<sup>196</sup> Gov't's Mot. to Dismiss, Ex. 9 at 2, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. May 7, 2020), ECF No. 198-10, <https://int.nyt.com/data/documenthelper/6936-michael-flynn-motion-to-dismiss/fa06f5e13a0ec71843b6/optimized/full.pdf>.

<sup>197</sup> *Id.*

<sup>198</sup> Philip Bump, *Timeline: What Flynn copped to — and what he didn't*, WASH. POST, Dec. 1, 2017, <https://www.washingtonpost.com/news/politics/wp/2017/12/01/timeline-what-flynn-copped-to-and-what-he-didnt/>.

<sup>199</sup> Gov't's Mot. to Dismiss, Ex. 9 at 3, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. May 7, 2020), ECF No. 198-10, <https://int.nyt.com/data/documenthelper/6936-michael-flynn-motion-to-dismiss/fa06f5e13a0ec71843b6/optimized/full.pdf>.

<sup>200</sup> Dep't of Justice Production at DOJSCO - 700023522, contained within Def.'s Third Supp. in Support of Dismissal, Ex. E, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-5, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>201</sup> Text message between Lisa Page and Peter Strzok (Jan. 23, 2017). Strzok- Page Texts Second Production at 37 (on file with Comms.).

- Page texts Strzok: “I can feel my heart beating harder, I’m so stressed out about all the ways this has the potential to go fully off the rails.”<sup>202</sup>
- Page texts Strzok: “Need to talk to you when you are done re razor.”<sup>203</sup>
- **Jan. 24, 2017:**
  - Priestap’s notes state, “I agreed yesterday that we shouldn’t show Flynn [redacted] if he didn’t admit,” and “What’s our goal? Truth/Admission or to get him to lie, so we can prosecute him or get him fired?”<sup>204</sup>
  - McCabe calls Flynn to arrange an interview.<sup>205</sup>
    - Strzok texts Page: “[REDACTED] had concerns about counsel serving as a witness.”<sup>206</sup>
    - Page responds to Strzok: “[McCabe’s] main interest was to take notes so that I could help him remember everything he needed to write down afterwards. I think it’s fine as it is.”<sup>207</sup>
    - Pages texts Strzok: “In with andy writing this up.”<sup>208</sup>
    - McCabe took notes from the call in which Flynn “questioned how so much information had been made public and asked if we [FBI] thought it had been leaked.”<sup>209</sup>
  - Strzok and FBI Supervisory Special Agent Joe Pientka interview Flynn at the White House.<sup>210</sup>
    - Yates (now Acting Attorney General) was reportedly “flabbergasted” and “dumbfounded” by that news, and that other senior DOJ officials “hit the roof” upon hearing of this development.<sup>211</sup> Yates “felt a decision to conduct an interview of Flynn should have been coordinated with DOJ.”<sup>212</sup>

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<sup>202</sup> *Id.*

<sup>203</sup> Dep’t of Justice Production at DOJSCO - 700023523, contained within Def.’s Third Supp. in Support of Dismissal, Ex. E, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-5, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>204</sup> Gov’t’s Mot. to Dismiss at 8 n.2, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. May 7, 2020), ECF No. 198, <https://int.nyt.com/data/documenthelper/6936-michael-flynn-motion-to-dismiss/fa06f5e13a0ec71843b6/optimized/full.pdf>.

<sup>205</sup> *Id.* at 8.

<sup>206</sup> Dep’t of Justice Production at DOJSCO - 700023524, contained within Def.’s Third Supp. in Support of Dismissal, Ex. E, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-5, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>207</sup> *Id.*

<sup>208</sup> *Id.*

<sup>209</sup> Gov’t’s Mot. to Dismiss, Ex. 11 at 2, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. May 7, 2020), ECF No. 198-12, <https://int.nyt.com/data/documenthelper/6936-michael-flynn-motion-to-dismiss/fa06f5e13a0ec71843b6/optimized/full.pdf>.

<sup>210</sup> Dep’t of Justice Production at DOJSCO - 700023494, contained within Def.’s Second Supp. in Support of Dismissal, Ex. A at 8, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. July 10, 2020), ECF No. 237-1, <https://static1.squarespace.com/static/5e80e0d236405d1c7b8eaec9/t/5eab8abb0d051f731cfe87e2/1588300482261/Doc.+189+Flynn+SECOND+SUPPLEMENT+TO+MOTION+TO+DISMISS+FOR+EGREGIOUS+GOVERNMENT+MISCONDUCT.pdf>.

<sup>211</sup> Gov’t’s Mot. to Dismiss at 7, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. May 7, 2020), ECF No. 198, <https://int.nyt.com/data/documenthelper/6936-michael-flynn-motion-to-dismiss/fa06f5e13a0ec71843b6/optimized/full.pdf>. See also *id.* Ex. E at 6, ECF No. 198-5.

<sup>212</sup> *Id.* Ex. E at 6, ECF No. 198-5.

- Comey later described the decision to interview Flynn as “something we, I probably wouldn’t have done or gotten away with in a more organized investigation – a more organized administration . . . . You would work through the White House counsel and there were discussions and approvals and it would be there and I thought, it’s early enough. Let’s just send a couple of guys over.”<sup>213</sup>
- **Jan. 25, 2017:**
  - Source 2’s fourth consensually monitored meeting with Carter Page.<sup>214</sup>
  - FBI briefs officials from DOJ’s Deputy Attorney General’s and National Security Division’s offices about the Flynn interview.<sup>215</sup>
    - Strzok texts Lisa Page: “At doj with Bill [Priestap] [and] [Jim] baker. . . . Fireworks.”<sup>216</sup>
    - Strzok texts Page: “Assume there’s Razor discussion I would like to be part of.”<sup>217</sup>
  - An FBI OGC attorney’s notes state about the Flynn case:
    - “Logan Act — ‘no reasonable prosecutor’”
    - “Uphill battle”
    - “other transition teams”
    - “first time to use it”<sup>218</sup>
- **Jan. 24–26, 2017:** FBI interviews Steele’s PSS at its Washington Field Office.<sup>219</sup>
  - Steele’s reporting was “misstated or exaggerated,” and some of the primary sub-source’s information was based on “rumor and speculation”,<sup>220</sup>
  - “he/she never expected Steele to put the Primary Sub-source’s statements in reports or present them as facts”,<sup>221</sup>

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<sup>213</sup> Tim Hains, *Comey: “I Sent” FBI Agents Into WH, Wouldn’t Have Gotten Away With It In A “More Organized Administration,”* REAL CLEAR POLITICS (Apr. 30, 2020), [https://www.realclearpolitics.com/video/2020/04/30/comey\\_i\\_sent\\_fbi\\_agents\\_into\\_the\\_white\\_house.html](https://www.realclearpolitics.com/video/2020/04/30/comey_i_sent_fbi_agents_into_the_white_house.html).

<sup>214</sup> IG Report at 325–26.

<sup>215</sup> Dep’t of Justice Production at DOJSCO - 700023496, contained within Def.’s Second Supp. in Support of Dismissal, Ex. A at 10, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. July 10, 2020), ECF No. 237-1, <https://static1.squarespace.com/static/5e80e0d236405d1c7b8eae9/t/5eab8abb0d051f731cfe87e2/1588300482261/Doc.+189+Flynn+SECOND+SUPPLEMENT+TO+MOTION+TO+DISMISS+FOR+EGREGIOUS+GOVERNMENT+MISCONDUCT.pdf>.

<sup>216</sup> Dep’t of Justice Production at DOJSCO - 700023524, contained within Def.’s Third Supp. in Support of Dismissal, Ex. E, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-5, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>217</sup> *Id.*

<sup>218</sup> Def.’s Fifth Supp. in Support of Agreed Dismissal, Ex. A., *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Oct. 7, 2020), ECF No. 264-1, <https://static1.squarespace.com/static/5e80e0d236405d1c7b8eae9/t/5f7e2f1e53e3f930b1a204e3/1602105119308/Fifth+Supplement+in+Support+of+Agreed+Dismissal+%28264%29.pdf>

<sup>219</sup> Letter from William Barr, Att’y Gen., Dep’t of Justice to Sen. Lindsey Graham, Chairman, S. Comm. on the Judiciary, et al. (July 17, 2020), <https://www.judiciary.senate.gov/imo/media/doc/February%209,%202017%20Electronic%20Communication.pdf>.

<sup>220</sup> *Id.* at 187.

<sup>221</sup> *Id.* at 188.

- “he/she made it clear to Steele that he/she had no proof to support the statements from his/her sub-sources and that ‘it was just talk’”,<sup>222</sup>
- Information was “word of mouth and hearsay”; “conversations that [he/she] had with friends over beers”; statements made in “‘jest.”<sup>223</sup>
- **Jan. 27, 2017:** Strzok texts Jennifer Boone and says that he “bets” Papadopoulos “fingers Page or Manafort” if the FBI is able to talk to him.<sup>224</sup>
- **Jan. 2017**
  - FBI’s CFH team receives reporting that Russian Intelligence Services may have targeted Orbis, Steele’s company.<sup>225</sup>
- **Early Feb. 2017:** FBI concludes there were no cyber links between the Trump organization and Alfa Bank.<sup>226</sup>
- **Feb. 2, 2017:** Strzok texts Lisa Page: “I mean, I feel like we’re living on borrowed time before some massively disastrous event.” Page responds: “Same here.”<sup>227</sup>
- **Feb. 9, 2017:** Based on leaks from “current and former” unnamed U.S. officials, media outlets publish articles about Flynn’s conversations with Kislyak, connecting it with potential Logan Act violations.
  - Strzok texts Page: “I’ll be here. Finishing the 302 ...”<sup>228</sup>
  - *Washington Post*: “National security adviser Flynn discussed sanctions with Russian ambassador, despite denials, officials say.”<sup>229</sup>
    - Strzok texts Page: “Nakashima article out. ... You see, ‘asked in an interview whether he had ever done so, he twice said ‘No.’” And re the twice said no fact, there are about 15 people who heard that directly. My money’s on Axelrod.”<sup>230</sup>

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<sup>222</sup> *Id.*

<sup>223</sup> *Id.*

<sup>224</sup> Text Message from Peter Strzok to Jennifer Boone (Jan. 27, 2017) [DOJ-HSGAC20201030-000018].

<sup>225</sup> IG Report at 189 n.342 (declassified).

<sup>226</sup> IG Report at 119 n.259.

<sup>227</sup> Text messages between Peter Strzok and Lisa Page (Feb. 2, 2017), Strzok-Page Texts Second Production at 47 (on file with Comms.).

<sup>228</sup> Dep’t of Justice Production at DOJSCO - 700023527, contained within Def.’s Third Supp. in Support of Dismissal, Ex. E, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-5, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>229</sup> Greg Miller, et al., *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).

<sup>230</sup> Dep’t of Justice Production at DOJSCO - 700023527, contained within Def.’s Third Supp. in Support of Dismissal, Ex. E, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-5, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020.DJSCO-700023527>.



- *N.Y. Times*: “Flynn Is Said to Have Talked to Russians About Sanctions Before Trump Took Office.”<sup>231</sup>
- **Feb. 13, 2017**: Flynn resigns as national security advisor.<sup>232</sup>
- **Feb. 13, 2017**: An unnamed individual texted Jennifer Boone, “Flynn needs to go.”<sup>233</sup>
- **Feb 14, 2017**:
  - Strzok texts Lisa Page: “Hi. Flynn’s out.” Page responds, “Yup, I saw.”<sup>234</sup>
  - Strzok texts Page: “You saw nyt has us interviewing F.”<sup>235</sup> Page responds, “Yes. Just flagged for dd<sup>236</sup> and d<sup>237</sup>. Will explain why later.”<sup>238</sup>
    - *N.Y. Times* publishes article, “Flynn’s Downfall Sprang From ‘Eroding Level of Trust.’”<sup>239</sup>
    - *N.Y. Times* publishes article, “Trump Campaign Aides Had Repeated Contacts with Russian Intelligence.”<sup>240</sup>
      - Strzok annotated a copy of this article, “we are unaware of any Trump advisors engaging in conversations with Russian intelligence officials.”<sup>241</sup>
  - Strzok texts Page: “Also, is Andy<sup>242</sup> good with F 302? Page responds, “Launch on F 302.”<sup>243</sup>

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<sup>231</sup> Matthew Rosenberg and Matt Apuzzo, *Flynn Is Said to Have Talked to Russians About Sanctions Before Trump Took Office*, N.Y. TIMES, Feb. 9, 2017, <https://www.nytimes.com/2017/02/09/us/flynn-is-said-to-have-talked-to-russians-about-sanctions-before-trump-took-office.html>.

<sup>232</sup> Maggie Haberman, et al., *Michael Flynn Resigns as National Security Adviser*, N.Y. TIMES, Feb. 13, 2017, <https://www.nytimes.com/2017/02/13/us/politics/donald-trump-national-security-adviser-michael-flynn.html>.

<sup>233</sup> Text Message from Unknown Individual to Jennifer Boone (Feb. 13, 2017) [DOJ-HSGAC20201030-000019].

<sup>234</sup> Text message between Peter Strzok and Lisa Page (Feb. 14, 2017), Strzok- Page Texts Second Production at 53 (on file with Comms.).

<sup>235</sup> “F” is most likely Michael Flynn.

<sup>236</sup> “dd” is most likely FBI Deputy Director Andrew McCabe.

<sup>237</sup> “d” is most likely FBI Director James Comey.

<sup>238</sup> Text messages between Peter Strzok and Lisa Page (Feb. 14, 2017), Strzok-Page Texts Second Production at 54 (on file with Comms.).

<sup>239</sup> Peter Baker, et al., *Flynn’s Downfall Sprang From ‘Eroding Level of Trust’*, N.Y. TIMES, Feb. 14, 2017, <https://www.nytimes.com/2017/02/14/us/politics/fbi-interviewed-mike-flynn.html>.

<sup>240</sup> Michael S. Schmidt, et al., *Trump Campaign Aides Had Repeated Contacts with Russian Intelligence*, N.Y. TIMES, Feb. 14, 2017, <https://www.nytimes.com/2017/02/14/us/politics/russia-intelligence-communications-trump.html>.

<sup>241</sup> Alan Cullison, *Newly Declassified Documents Suggest FBI was Wary by Early 2017 of Steele Dossier*, WALL ST. J., July 19, 2020, <https://www.wsj.com/articles/newly-declassified-documents-suggest-fbi-was-wary-by-early-2017-of-steele-dossier-11595174264>. See also annotated document, <https://www.judiciary.senate.gov/imo/media/doc/Annotated%20New%20York%20Times%20Article.pdf>.

<sup>242</sup> “Andy” is most likely Andrew McCabe.

<sup>243</sup> Text messages between Peter Strzok and Lisa Page (Feb. 14, 2017), Strzok-Page Texts Second Production at 54 (on file with Comms.).

- **Feb. 15, 2017:**
  - After interviewing a primary sub-source in January, Strzok emails Priestap and states that “recent interviews and investigation [] reveal [Steele] may not be in a position to judge the reliability of his sub-source network.”<sup>244</sup>
  - Strzok texts Lisa Page: “Made the fortunate decision to stick my head in to find Jim [Baker] and [REDACTED] in there briefing EVERYONE about his idea to reinterview[w] Flynn.”<sup>245</sup>
  - Strzok texts Page: “Hey I’m finally getting around to reading news. The WP<sup>246</sup> has an article today **that’s really bad in level of detail, you need to read it.** Kind of opposite the NYT one.” Page responds: “Could you send it? I haven’t read anything today either.”<sup>247</sup>
    - *Washington Post* publishes article, “The Flynn crisis paralyzes the White House.”<sup>248</sup>
- **Feb. 16, 2017:** Strzok texts Lisa Page, “Check WP<sup>249</sup> feed. Article 20 minutes ago that F<sup>250</sup> denied discussing sanctions.”<sup>251</sup>
  - *Washington Post* publishes article, “Flynn in FBI interview denied discussing sanctions with Russian ambassador.”<sup>252</sup>
- **Feb. 27, 2017**
  - FBI’s CFH team receives intelligence reporting that a different part of Steele’s reporting was “the product of [Russian Intelligence Services] ‘infiltrat[ing] a source into the network.’”<sup>253</sup>
- **Mar. 2017:** FBI interviews Steele’s primary sub-source a second time.<sup>254</sup>

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<sup>244</sup> IG Report at 188.

<sup>245</sup> Dep’t of Justice Production at DOJSCO - 700023529, contained within Def.’s Third Supp. in Support of Dismissal, Ex. E, *United States v. Michael T. Flynn*, No. 17-cr-232-EGS (D.D.C. Sept. 24, 2020), ECF No. 248-5, <https://www.scribd.com/document/477366112/Flynn-Memo-Sept-24-2020>.

<sup>246</sup> “WP” most likely refers to the Washington Post.

<sup>247</sup> Text messages between Peter Strzok and Lisa Page (Feb. 15, 2017), Strzok-Page Texts Second Production at 56 (on file with Comms.).

<sup>248</sup> Jennifer Rubin, *The Flynn crisis paralyzes the White House*, WASH. POST, Feb. 15, 2017, <https://www.washingtonpost.com/blogs/right-turn/wp/2017/02/15/the-flynn-crisis-paralyzes-the-white-house/?outputType=amp>.

<sup>249</sup> “WP” most likely refers to the Washington Post.

<sup>250</sup> “F” most likely refers to Michael Flynn.

<sup>251</sup> Text messages between Peter Strzok and Lisa Page (Feb. 16, 2017), Strzok-Page Texts Second Production at 57 (on file with Comms.).

<sup>252</sup> Sari Horwitz and Adam Entous, *Flynn in FBI interview denied discussing sanctions with Russian ambassador*, WASH. POST, Feb. 16, 2017, [https://www.washingtonpost.com/world/national-security/flynn-in-fbi-interview-denied-discussing-sanctions-with-russian-ambassador/2017/02/16/e3e1e16a-f3d5-11e6-8d72-263470bf0401\\_story.html](https://www.washingtonpost.com/world/national-security/flynn-in-fbi-interview-denied-discussing-sanctions-with-russian-ambassador/2017/02/16/e3e1e16a-f3d5-11e6-8d72-263470bf0401_story.html).

<sup>253</sup> IG Report at 195 n. 350 (declassified); Press release, Sen. Charles Grassley, Chairman, S. Comm. on Fin. (Apr. 15, 2020), <https://www.grassley.senate.gov/news/news-releases/ig-footnotes-serious-problems-dossier-sources-didnt-stop-fbi-s-page-surveillance>.

<sup>254</sup> *Id.* at 186.

- **Mar. 6, 2017:** Chairman Grassley opens an investigation into the FBI’s use of the Steele Dossier.<sup>255</sup>
- **Mar. 27, 2017:** Chairman Grassley opens an investigation into Fusion GPS and the Steele Dossier’s funding.<sup>256</sup>
- **Apr. 7, 2017:** FISC grants second renewal for Carter Page FISA on application approved by Acting Deputy Attorney General Dana Boente.<sup>257</sup>
- **Apr. 13, 2017:** Strzok emails FBI colleagues: “I’m beginning to think the agency got info a lot earlier than we thought and hasn’t shared it completely with us. Might explain all these weird/seemingly incorrect leads all these media folks have. Would also highlight agency as source of some of the leaks.”<sup>258</sup>
- **May 2017:** FBI interviews Steele’s primary sub-source for the third time.<sup>259</sup>
- **May 2, 2017:** Jennifer Boone texts an unknown person: “As I settled in for my read of the FISA app, I realized it’s the renewal and not the initiation so it doesn’t contain all of the material facts (the full story). ?Can you dig up the initiation app?”<sup>260</sup>
- **May 9, 2017:** Comey is fired.<sup>261</sup>
- **May 17, 2017:** CFH transferred to Office of Special Counsel.<sup>262</sup>
  - “[T]o ensure a full and thorough investigation of the Russian government’s efforts to interfere in the 2016 presidential election,” Deputy Attorney General Rod Rosenstein authorizes the appointment of a Special Counsel to investigate “any links and/or coordination between the Russian government and individuals associated with the campaign of President Donald Trump”<sup>263</sup>
  - The DOJ Inspector General reported that, according to Priestap, by May 2017, the FBI “didn’t have any indication whatsoever” that Steele’s reporting was part of a Russian disinformation campaign.<sup>264</sup>

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<sup>255</sup> Press release, Sen. Charles Grassley, Chairman, S. Comm. on the Judiciary (Mar. 6, 2017) <https://www.grassley.senate.gov/news/news-releases/fbi-plan-pay-ex-spy-trump-intel-during-campaign-sparks-questions-obama-admin's>.

<sup>256</sup> Press release, Sen. Charles Grassley, Chairman, S. Comm. on the Judiciary (Mar. 27, 2017) <https://www.grassley.senate.gov/news/news-releases/grassley-probes-opposition-research-firm-behind-unsubstantiated-trump-dossier>.

<sup>257</sup> *Id.* at 7, 74.

<sup>258</sup> E-mail from Peter Strzok, Fed. Bureau of Investigation I\_HJC\_03\_22\_18\_Req7\_000376, 377 (Apr. 13, 2017). (on file with Comms.).

<sup>259</sup> IG Report at 186.

<sup>260</sup> Text Message from Jennifer Boone to Unknown Individual (May 2, 2017) [DOJ-HSGAC20201030-000024].

<sup>261</sup> Tessa Berenson, *Here's a Timeline of What Led to James Comey's Firing*, TIME, May 10, 2017, <https://time.com/4774278/james-comey-fired-timeline/>.

<sup>262</sup> IG Report at 1.

<sup>263</sup> Rod Rosenstein, Deputy Att’y Gen., Dep’t of Justice, *Appointment of Special Counsel to Investigate Russian Interference with the 2016 Presidential Election and Related Matters*, Order No. 3915-2017 (May 17, 2017), <https://www.justice.gov/opa/press-release/file/967231/download>

<sup>264</sup> IG Report at 194.

- **May 19, 2017:**
  - Strzok texts Lisa Page: “For me, and this case, I personally have a sense of unfinished business. I unleashed it with MYE. Now I need to fix it and finish it.”<sup>265</sup>
  - Strzok texts Page: “you and I both know the odds are nothing. If I thought it was likely I’d be there no question. I hesitate in part because of my gut sense and concern there’s no big there there.”
- **May 25, 2017:** Defense Intelligence Agency personnel brief Judiciary Committee staff and provide an *in camera* review of classified documents relating to Lt. Gen. Flynn.<sup>266</sup>
- **Early June 2017:** The FBI receives reporting that one of Steele’s sub-sources:
  - Had personal and business ties with Steele’s PSS;
  - Had contact with an individual in the Russian Presidential Administration in June/July 2016; and
  - Voiced strong support for candidate Clinton in the 2016 election.<sup>267</sup>
- **June 19, 2017:** FBI Attorney alters email to read that Carter Page was not a source for another U.S. government agency.<sup>268</sup>
- **June 29, 2017:** FISC grants third renewal for Carter Page FISA on application approved by Deputy Attorney General Rosenstein.<sup>269</sup>
- **July 6, 2017:** Chairman Johnson releases a report titled, “State Secrets: How an Avalanche of Media Leaks is Harming National Security.” The report reveals that there were 125 leaked stories during the first 126 days of the Trump administration.<sup>270</sup>
- **July 24, 2017:** Chairman Grassley receives written material from Jared Kushner as part of his investigation into the June 9, 2016 Trump Tower meeting.<sup>271</sup>

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<sup>265</sup> Text Message from Peter Strzok to Lisa Page (May 19, 2017), Strzok-Page Texts at DOJ-PROD-0000340-341 (on file with Comms.).

<sup>266</sup> Letter from Sen. Charles Grassley, Chairman, S. Comm. on the Judiciary to The Honorable James Mattis, Secretary of Defense, and Lt. General Vincent R. Stewart, Director, Defense Intelligence Agency (August 25, 2017). [https://www.judiciary.senate.gov/imo/media/doc/2017-08-25%20CEG%20to%20DOD%20DIA%20\(unclassified%20cover%20letter%20to%20classified%20Flynn%20letter\).pdf](https://www.judiciary.senate.gov/imo/media/doc/2017-08-25%20CEG%20to%20DOD%20DIA%20(unclassified%20cover%20letter%20to%20classified%20Flynn%20letter).pdf)

<sup>267</sup> IG Report at 192–93 n.347 (declassified).

<sup>268</sup> *Id.* at 160, 254-55.

<sup>269</sup> *Id.* at 7, 74.

<sup>270</sup> S. Comm. on Homeland Sec. & Gov’t Aff., *State Secrets: How an Avalanche of Media Leaks is Harming National Security* (Jul. 2017), <https://www.hsgac.senate.gov/imo/media/doc/2017-07-06%20State%20Secrets%20report.pdf>.

<sup>271</sup> Press release, Sen. Charles Grassley, Chairman, S. Comm. on the Judiciary (May 16, 2018). <https://www.judiciary.senate.gov/press/releases/materials-from-inquiry-into-circumstances-surrounding-trump-tower-meeting>.

- **July 25, 2017:** Chairman Grassley receives June 9, 2016 Trump Tower meeting notes from Paul Manafort.<sup>272</sup>
- **July 27, 2017:** McCabe removes Strzok from Special Counsel team.<sup>273</sup>
- **Aug. 22, 2017:** Chairman Grassley interviews Glenn Simpson as part of his investigation into the June 9, 2016 Trump Tower meeting.<sup>274</sup>
- **August 25, 2017:** Chairman Grassley requests the Department of Defense and Defense Intelligence Agency declassify Lt. Gen. Flynn information DIA briefed to the Judiciary Committee on May 25, 2017.<sup>275</sup> That request was reissued on May 12, 2020.
- **Sept. 7, 2017:** Chairman Grassley interviews Donald Trump, Jr. as part of his investigation into the June 9, 2016 Trump Tower meeting.<sup>276</sup>
- **Sept. 22, 2017:** FISA coverage of Carter Page ends.<sup>277</sup>
- **Oct. 24, 2017**
  - Perkins Coie sends a letter authorizing Fusion GPS to disclose that it was hired on behalf of the DNC and Clinton campaign.<sup>278</sup>
  - *The Washington Post* reports, “Clinton campaign, DNC paid for research that led to Russia dossier.”<sup>279</sup>
  - *N.Y. Times* reports, “Clinton Campaign and Democratic Party Helped Pay for Russia Trump Dossier.”
    - *N.Y. Times* reporter Maggie Haberman tweets, “Folks involved in funding this lied about it, and with sanctimony, for a year.”<sup>280</sup>

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<sup>272</sup> *Id.*

<sup>273</sup> Kyle Cheney, *McCabe reveals he's the one who decided to remove Strzok from Mueller's team*, POLITICO, May 20, 2019, <https://www.politico.com/story/2019/05/20/mueller-investigation-mccabe-strzok-1336694>.

<sup>274</sup> Press release, Sen. Charles Grassley, Chairman, S. Comm. on the Judiciary (May 16, 2018). <https://www.judiciary.senate.gov/press/releases/materials-from-inquiry-into-circumstances-surrounding-trump-tower-meeting>.

<sup>275</sup> Press release, Sen. Charles Grassley, Chairman, S. Comm. on Fin. (May 12, 2020). <https://www.grassley.senate.gov/news/news-releases/following-motion-dismiss-flynn-case-grassley-renews-call-transparency>

<sup>276</sup> *Id.*

<sup>277</sup> IG Report at 7.

<sup>278</sup> Letter from Matthew J. Gehringer, Gen. Counsel, Perkins Coie LLP, to William W. Taylor, III, Zuckerman Spaeder LLP (Oct. 24, 2017), <https://www.documentcloud.org/documents/4116755-PerkinsCoie-Fusion-PrivelegeLetter-102417.html>.

<sup>279</sup> Adam Entous, et al., *Clinton campaign, DNC paid for research that led to Russia dossier*, WASH. POST, Oct. 24, 2017, [https://www.washingtonpost.com/world/national-security/clinton-campaign-dnc-paid-for-research-that-led-to-russia-dossier/2017/10/24/226fabf0-b8e4-11e7-a908-a3470754bbb9\\_story.html](https://www.washingtonpost.com/world/national-security/clinton-campaign-dnc-paid-for-research-that-led-to-russia-dossier/2017/10/24/226fabf0-b8e4-11e7-a908-a3470754bbb9_story.html).

<sup>280</sup> Joe Concha, *New York Times reporters blast Dems over Trump dossier funding claims*, THE HILL, Oct. 25, 2017, <https://thehill.com/homenews/media/357079-new-york-times-reporters-blast-dems-over-trump-dossier-funding-claims>.

- *N.Y. Times* reporter Ken Vogel tweets, “When I tried to report this story, Clinton campaign lawyer @marceelias pushed back vigorously, saying ‘You (or your sources) are wrong.’”<sup>281</sup>
- **Nov. 2017:** Chairman Grassley interviews Irakly “Ike” Kaveladze, Anatoli Samochornov, and Rinat Akhmetshin and receives written responses from Natalia Veselnitskaya as part of his investigation into the June 9, 2016 Trump Tower meeting.<sup>282</sup>
  - Natalia Veselnitskaya told NBC News that she received the information she brought to her June 2016 meeting at Trump Tower from Glenn Simpson and Fusion GPS.<sup>283</sup>
- **Dec. 2017:** FBI memo for Congressional briefing states it “did not assess it likely that the [Steele election reporting] was generated in connection to a Russian disinformation campaign.”<sup>284</sup>
- **Dec. 15, 2017:** Chairman Grassley interviews Robert Goldstone as part of his investigation into the June 9, 2016 Trump Tower meeting.<sup>285</sup>
- **Dec. 12, 2017:** Initial press reports on the content of the Strzok/Page text messages.<sup>286</sup>
- **Jan. 5, 2018:** Chairman Grassley and Senator Graham refer Christopher Steele to the Justice Department for investigation of potential violations of 18 U.S.C. § 1001 for false statements.<sup>287</sup>
- **Jan. 19, 2018:** FBI notifies Congress that it did not preserve five months of Strzok/Page text messages.<sup>288</sup>

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<sup>281</sup> *Id.*

<sup>282</sup> Press release, Sen. Charles Grassley, Chairman, S. Comm. on the Judiciary (May 16, 2018), <https://www.judiciary.senate.gov/press/releases/materials-from-inquiry-into-circumstances-surrounding-trump-tower-meeting>.

<sup>283</sup> Ken Dilanian, *Trump Dossier Firm Also Supplied Info Used in Meeting of Russians, Trump Team*, NBC News (Nov. 10, 2017), <https://www.nbcnews.com/news/us-news/trump-dossier-firm-also-supplied-info-used-meeting-russians-trump-n819526>.

<sup>284</sup> IG Report at 194.

<sup>285</sup> Press release, Sen. Charles Grassley, Chairman, S. Comm. on the Judiciary (May 16, 2018). <https://www.judiciary.senate.gov/press/releases/materials-from-inquiry-into-circumstances-surrounding-trump-tower-meeting>.

<sup>286</sup> Kevin Johnson, *Peter Strzok, FBI agent removed from Robert Mueller's Russia probe, called Trump an 'idiot'*, USA TODAY, Dec. 12, 2017, <https://www.usatoday.com/story/news/politics/2017/12/12/peter-strzok-fbi-agent-removed-muellers-russia-probe-called-trump/946913001/>.

<sup>287</sup> Press release, Sen. Charles Grassley, Chairman, S. Comm. on the Judiciary (Jan. 5, 2018), <https://www.grassley.senate.gov/news/news-releases/senators-grassley-graham-refer-christopher-steele-criminal-investigation>.

<sup>288</sup> Letter from Stephen Boyd, Ass't Att'y Gen. for Leg. Aff., Dep't of Justice, to Sen. Ron Johnson, Chairman, S. Comm. on Homeland Sec. & Gov't Aff. (Jan. 19, 2018) (on file with Comms.).

- **Mar. 16, 2018:** McCabe is fired.<sup>289</sup>
- **Apr. 19, 2018:** Reports indicate that DOJ OIG referred McCabe to federal prosecutors for lying.<sup>290</sup>
- **May 3, 2018:** Senate Select Committee on Intelligence employee James Wolfe is arrested on charges of lying and making false statements to the FBI about his contacts with reporters and whether he leaked “nonpublic information” to a *N.Y. Times* reporter.<sup>291</sup>
- **May 4, 2018:** Lisa Page resigns from the FBI.<sup>292</sup>
- **June 14, 2018:** IG Horowitz releases his 2016 election report.<sup>293</sup>
- **Aug. 10, 2018:** Strzok is fired.<sup>294</sup>
- **Dec. 13, 2018:** DOJ OIG issues report about recovering 20,071 total Strzok/Page texts.<sup>295</sup>
- **Apr. 18, 2019:** Mueller Report becomes public.<sup>296</sup>
- **Dec. 9, 2019:** IG Horowitz releases his FISA report.<sup>297</sup>
- **Aug. 14, 2020:** Former FBI attorney Kevin Clinesmith pleads guilty to altering email.<sup>298</sup>

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<sup>289</sup> Matt Zapposky, *Andrew McCabe, Trump’s Foil at the FBI, is Fired Hours Before He Could Retire*, WASH. POST, Mar. 17, 2018, [https://www.washingtonpost.com/world/national-security/fbis-andrew-mccabe-is-fired-a-little-more-than-24-hours-before-he-could-retire/2018/03/16/e055a22a-2895-11e8-bc72-077aa4dab9ef\\_story.html](https://www.washingtonpost.com/world/national-security/fbis-andrew-mccabe-is-fired-a-little-more-than-24-hours-before-he-could-retire/2018/03/16/e055a22a-2895-11e8-bc72-077aa4dab9ef_story.html).

<sup>290</sup> Pamela Brown and Lauren Jarrett, *Justice Dept. Watchdog Sends McCabe Findings to Federal Prosecutors for Possible Charges*, CNN, Apr. 19, 2018, <https://www.cnn.com/2018/04/19/politics/justice-mccabe-criminal-referral/index.html>.

<sup>291</sup> Bryan Logan, *Former Senate Intel Committee employee arrested on charges of lying to the FBI*, BUSINESS INSIDER, Jun. 7, 2018, <https://www.businessinsider.com/senate-intel-staffer-james-wolfe-arrested-charged-with-lying-to-fbi-2018-6>.

<sup>292</sup> Laura Jarrett and Josh Campbell, *FBI officials Lisa Page and James Baker resign*, CNN, May 5, 2018, <https://www.cnn.com/2018/05/04/politics/fbi-officials-lisa-page-james-baker-resign/index.html>.

<sup>293</sup> Matt Apuzzo, *Report Criticizes Comey but Finds No Bias in F.B.I. Decision on Clinton*, N.Y. TIMES, June 14, 2018, <https://www.nytimes.com/2018/06/14/us/politics/fbi-inspector-general-comey-trump-clinton-report.html>.

<sup>294</sup> Matt Zapposky, *FBI Agent Peter Strzok Fired Over Anti-Trump Texts*, WASH. POST, Aug. 13, 2018, [https://www.washingtonpost.com/world/national-security/fbi-agent-peter-strzok-fired-over-anti-trump-texts/2018/08/13/be98f84c-8e8b-11e8-b769-e3fff17f0689\\_story.html](https://www.washingtonpost.com/world/national-security/fbi-agent-peter-strzok-fired-over-anti-trump-texts/2018/08/13/be98f84c-8e8b-11e8-b769-e3fff17f0689_story.html).

<sup>295</sup> Jacqueline Thomsen, *DOJ watchdog: No clear ‘pattern’ in missing Strzok, Page texts*, THE HILL, Dec. 13, 2018, <https://thehill.com/policy/national-security/421212-doj-watchdog-no-clear-pattern-in-missing-strzok-page-texts>.

<sup>296</sup> Kristine Phillips, *Timeline: The events that led to the inspector general’s report on the origins of the Russia probe*, USA TODAY, Dec. 9, 2019, <https://www.usatoday.com/in-depth/news/2019/12/09/horowitz-fisa-report-timeline-fbis-russia-probe-carter-page-surveillance/2623350001/>.

<sup>297</sup> *Id.*

<sup>298</sup> Matt Zapposky & Devlin Barrett, *Ex-FBI lawyer, accused of falsifying document in probe of Trump’s campaign, to plead guilty*, WASH. POST, Aug. 14, 2020, [https://www.washingtonpost.com/national-security/kevin-clinesmith-fbi-trump-russia-john-durham/2020/08/14/2f579994-de26-11ea-809e-b8be57ba616e\\_story.html](https://www.washingtonpost.com/national-security/kevin-clinesmith-fbi-trump-russia-john-durham/2020/08/14/2f579994-de26-11ea-809e-b8be57ba616e_story.html).