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AL FRANKEN, MINNESOTA  
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# United States Senate

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6275

KOLAN L. DAVIS, *Chief Counsel and Staff Director*  
JENNIFER DUCK, *Democratic Staff Director*

October 27, 2017

**VIA MAIL AND EMAIL (sryan@mwe.com)**

Michael D. Cohen, Esq.  
c/o Stephen M. Ryan  
McDermott Will & Emery  
500 North Capitol Street, NW  
Washington, DC 20001

Dear Mr. Cohen:

In July, the Committee sent out requests for information related to its investigation into the removal of FBI Director James Comey, allegations of improper influence in law enforcement investigations, and Russian interference in the 2016 election. To further advance that effort, I am writing to request that you appear for an interview in November and also produce the following documents to the Committee no later than November 6, 2017.

For the time period January 1, 2015 to the present:

1. All communications to, from, or copied to you relating to Felix Sater, Andrey Artemenko, Rob Goldstone, Emin Agalarov, Aras Agalarov, Natalia Veselnitskaya, Rinat Akhmetshin, Anatoli Samochornov, Irakly (Ike) Kaveladze, Christopher Steele, Aleksey Gubarev, Webzilla B.V., XBT Holdings S.A., Dmitry Peskov, Vladimir Putin, the Ritz Carlton Moscow Hotel, Sergei Ivanov, Sergei Millian, Dmitry Medvedev, Michael G. Flynn, Michael T. Flynn, Jill Stein, Konstantin Kosachev, Viktor Yanukovych, Sergei Kislyak, Yuri Ushakov, Anton Vaino, Mikhail Kalugin, Andrei Bondarev, Mikhail Fridman, Petr Aven, German Khan, Oleg Govorun, Sergey Lavrov, Sergei Kiriyyenko, Oleg Solodukhin, Konstantin Kilimnik, Oleg Deripaska, Tim Unes, Rick Gates, Philip Griffin, Frank Mermoud, Corey Lewandowski, Erik Prince, Peter W. Smith, Jared Kushner, Paul Manafort, Dan Scavino, Jr., Hope Hicks, Rick Clay, Alexander Torshin, Maria Butina, Johnny Yenason, Bob Forseman, Curt Weldon, Paul Erickson, or Ivan Timovfee. This shall include any documents referring to any of the aforementioned using alternate spellings, pseudonyms, nicknames, abbreviations, or codes;
2. All documents concerning all payments, directly or indirectly, to or from Felix Sater by or to you.

3. All documents concerning efforts by the Trump Organization or its affiliates to develop, or partner with a developer to build, a Trump-branded property in Moscow, Russia.
4. All communications concerning (i) Sberbank, or (ii) Vneshtorgbank (a/k/a VTB Bank), or (iii) Alfa Bank.
5. All documents concerning your reported meeting with Andrey Artemenko in or about January 2017 at the Loews Regency Hotel in New York, including but not limited to all documents concerning a purported proposed Russia-Ukraine peace plan.
6. All documents concerning any effort to obtain, disclose, or disseminate "hacked" emails or other electronic data belonging to or housed on the servers of the Democratic National Committee (DNC), John Podesta, Hillary Clinton, or the 2016 U.S. presidential campaign of Hillary Clinton by WikiLeaks or any other media, news leaks, or hacking organization (e.g., Guccifer 2.0, DCLeaks).
7. All communications with Russians government officials, associates, or representatives; any individuals who purported to act or whom you believed to be acting on behalf of or in concert with Russian government officials, associates, or representatives, or anyone who might have been involved in or in receipt of information obtained as a result of Russia's influence campaign.
8. All documents concerning Russian interference in the 2016 U.S. presidential campaign.

Instructions and definitions are included in Attachment A.

We appreciate your prompt attention to this important matter. Please contact Heather Sawyer on my staff at (202) 224-7703 to discuss arrangements for production.

Sincerely,



Dianne Feinstein  
United States Senator

Enclosure

CC: The Honorable Charles E. Grassley

## ATTACHMENT A

### Instructions and Definitions:

1. The documents requested include all those that are in your custody, control or possession, or within your or your representative's right of custody, control or possession.
2. The terms "**you**" and "**your**" means the person to whom this request was addressed, including Michael D. Cohen and any present or former representative of Mr. Cohen.
3. The term "**person**" means a natural person, firm, association, organization, partnership, business, trust, corporation, bank or any other private or public entity.
4. The term "**representative**" means any present or former family members, officers, executives, partners, joint-venturers, directors, trustees, employees, consultants, accountants, attorneys, agents, or any other representative acting or purporting to act on behalf of another person.
5. The term "**document**" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: agreements; papers; memoranda; correspondence; reports; studies; reviews; analyses; graphs; diagrams; photographs; charts; tabulations; presentations; working papers; records; records of interviews; desk files; notes; letters; notices; confirmations; telegrams; faxes, telexes, receipts; appraisals; interoffice and intra office communications; electronic mail (e-mail); electronic messages; text messages; contracts; cables; recordings, notations or logs of any type of conversation, telephone call, meeting or other communication; bulletins; printed matter; computer printouts; teletype; invoices; transcripts; audio or video recordings; statistical or informational accumulations; data processing cards or worksheets; computer stored or generated documents; computer databases; computer disks and formats; machine readable electronic files; data or records maintained on a computer; instant messages; diaries; questionnaires and responses; data sheets; summaries; minutes; bills; accounts; estimates; projections; comparisons; messages; correspondence; and similar or related materials. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
6. The term "**communication**" means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether face to face, in meeting, by telephone, mail, telex, facsimile, computer, discussions, releases, delivery, or otherwise.
7. The term "**concerning**" means directly or indirectly, in whole or in part, describing, constituting, evidencing, recording, evaluating, substantiating, concerning, referring to, alluding to, in connection with, commenting on, relating to, regarding, discussing, showing, describing, analyzing or reflecting.

8. To the extent necessary to bring within the scope of this request any information or Documents that might otherwise be construed to be outside its scope:
  - a. the word “**or**” means “and/or”
  - b. the word “and” means “and/or”;
  - c. the functional words “each,” “every,” “any,” and “all” shall each be deemed to include each of the other functional words;
  - d. the masculine gender includes the female gender and the female gender includes the masculine gender; and
  - e. the singular includes the plural and the plural includes the singular.
9. If the request cannot be complied with in full, it shall be complied with to the extent possible, with an explanation why a full response is not possible. Any document withheld on the basis of privilege shall be identified on a privilege log submitted with the responses to this request. The log shall state the date of the document, the type of document and number of pages, its author, his or her occupation and employer, all recipients, the occupation and employers of each recipient, the subject matter, the privilege claimed, and a brief explanation of the basis of the claim of privilege. If any document responsive to this request was but no longer is in your possession, custody, or control, identify the document and explain the circumstances by which it ceased to be in your possession, custody, or control.
10. Documents should be labeled with sequential numbering (bates-stamped).
11. Unless otherwise specified, the time period covered by this request is from January 1, 2015 to the date of production.