



U.S. Department of Justice

Jessie K. Liu  
United States Attorney

*District of Columbia*

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*Judiciary Center  
555 Fourth St., N.W.  
Washington, D.C. 20530*

April 25, 2019

*Via Email*

William W. Taylor, III  
William J. Murphy  
Zuckerman Spaeder LLP  
1800 M Street NW, Suite 1000, North Tower  
Washington, DC 20036-5807

Re: *United States v. Gregory B. Craig*, 19-cr-00125 (ABJ)

Dear Counsel:

We are writing to memorialize the agreement we have reached regarding the potential testimony of [REDACTED] at trial. If you agree to these conditions, please execute this document in the space provided below.

First, with respect to the potential expected testimony of [REDACTED], as generally reflected in their grand jury transcripts, the government will limit its questioning of these two fact witnesses to the time period on or before January 16, 2014. Similarly, we will not elicit testimony from [REDACTED] regarding any communications they had with Mr. Craig after January 16, 2014. We understand that, in turn, you will not seek to cross-examine [REDACTED] about evidence or testimony of or concerning events that occurred after January 16, 2014, or any communications they had with Mr. Craig after January 16, 2014.

More broadly, the government will not seek to introduce testimony or evidence of or concerning a) the Settlement Agreement ("the Settlement") dated January 15, 2019, between Skadden, Arps, Slate, Meagher and Flom, LLP ("Skadden") and the National Security Division of the United States Department of Justice; or b) any of the retroactive Foreign Agents Registration Act filings related to the Skadden Report on the trial of Yulia Tymoshenko, including the January 18, 2019 filing by Skadden and any short-form registration filings by current or former Skadden personnel, including any reference to the existence of such filings ("Skadden FARA filings"). We understand that, in turn, you will not seek to introduce or elicit through cross-examination or testimony any evidence of or concerning the Settlement Agreement, the Skadden FARA filings, or make arguments regarding the absence of evidence regarding these issues.

We believe that, based on this agreement, neither the Settlement Agreement nor the Skadden FARA filings will be raised by either party in any way during Mr. Craig's trial. However,

each party reserves the right to ask the Court for permission to introduce this evidence in rebuttal and/or in response to any argument or evidence offered by the other party that makes it relevant to the jury's determination of the charges.

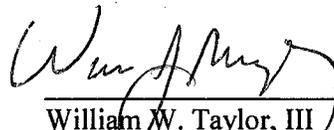
If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU  
United States Attorney

By:   
Fernando Campoamor Sánchez  
Molly Gaston  
*Assistant United States Attorneys*  
Jason B.A. McCullough  
*Trial Attorney, National Security Division*

ATTORNEY'S ACKNOWLEDGEMENT

  
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