

**EXHIBIT 18**

**WITHOUT PREJUDICE**

**March 23, 2020**

Proposed ESI Search Terms for Defendants  
*Fridman v. Bean LLC a/k/a Fusion GPS, 17-cv-2041 (D.D.C. 2017)*

Date Range: TBD

Custodians/Locations:

- General Fusion Document Management Systems
- Glenn Simpson (including personal email/documents)
- Peter Fritsch \*
- Tom Catan \*
- Jacob Berkowitz \*
- Jason Felch \*
- Laura Seago \*
- Nellie Ohr \*
- Taylor Sears \*
- Neil King \*
- David Michaels \*

\*Plaintiffs reserve the right to request personal email of other Fusion employees if it appears that personal email would contain relevant information/documents.

Search Terms

- Bangor
- Source! and (“Dossier” or “CIR” or “intelligence report!” or “memo!”)
- (“Verif!” or “reliab!” or “rumor!” or “rumour!” or “gossip”) and (“Dossier” or “CIR” or “intelligence report!” or “memo!” or “source!”)
- Orbis and (“Dossier” or “CIR” or “intelligence report!” or “memo!” or “source!”)
- Steele and (“Dossier” or “CIR” or “intelligence report!” or “memo!” or “source!”)
- Chris! and (“Dossier” or “CIR” or “intelligence report!” or “memo!” or “source!”)
- Ohr and (“Dossier” or “CIR” or “intelligence report!”)
- Kramer and (“Dossier” or “CIR” or “intelligence report!”)
- Nytimes and (“Dossier” or “CIR” or “intelligence report!”)

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- New York Times and (“Dossier” or “CIR” or “intelligence report!”)
- NYT and (“Dossier” or “CIR” or “intelligence report!”)
- Corn and (“Dossier” or “CIR” or “intelligence report!”)
- Mother Jones and (“Dossier” or “CIR” or “intelligence report!”)
- MotherJones and (“Dossier” or “CIR” or “intelligence report!”)
- Winer and (“Dossier” or “CIR” or “intelligence report!”)
- Fridman or “Petr Olegovich”
- Aven or “German Borisovich”
- Khan or “Oleg Markovich”
- Govorun
- Oligarch! and (“Dossier” or “CIR” or “intelligence report!”)
- BuzzFeed and (“Dossier” or “CIR” or “intelligence report!”)
- Kompromat
- Putin and (“Alfa” or “Alpha” or “cash” or “bag carrier” or “driver” or “TNK” or “bid!” or “corrupt!” or “Petersburg!” or “Leningrad!” or “lever!” or “favor!” or “favour!” or “advi!” or “pressure” or “bribe!”)
- Kremlin and (“Alfa” or “Alpha” or “cash” or “bag carrier” or “driver” or “TNK” or “bid!” or “corrupt!” or “Petersburg!” or “Leningrad!” or “lever!” or “favor!” or “favour!” or “advi!” or “pressure” or “bribe!”)
- Alfa or Alpha or LetterOne or L1
- Sergei or Millian
- (“Trump” or “GOP” or “Republican!” or “Democrat!” or “Hillary” or “Clinton”) and (“dirt” or “oppo!” or “research”)