

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**MICHAEL T. FLYNN,**

**Defendant**

**Crim. No. 17-232 (EGS)**

**NOTICE OF COMPLIANCE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby notifies the Court that it has complied with the Court's September 6, 2020 Minute Order by delivering to the Court three bound and indexed copies of [249], the Government's supplement to its motion to dismiss, and [227].

Respectfully submitted,

MICHAEL R. SHERWIN  
United States Attorney  
NY Bar No. 4444188

KENNETH C. KOHL  
Acting Principal Assistant U.S. Attorney  
D.C. Bar. No. 476236

By: /s/ Jocelyn Ballantine  
Jocelyn Ballantine  
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Dated: September 28, 2020