

Exhibit 33 to Memorandum and Points of  
Authorities in Support of Defendant  
Concord Management and Consulting  
LLC's Renewed Motion to Dismiss the  
Indictment, 18-cr-32-DLF



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*

October 4, 2019

Eric Dubelier, Esq.  
Katherine Seikaly, Esq.

*Re: U.S. v. Concord Management and Consulting, LLC, Case No. 18-CR-32-2 (DLF)*

Dear Counsel:

Pursuant to the Court's instructions at the September 16, 2019 status hearing, we write to supplement the government's bill of particulars as follows.

The government intends to argue at trial that the defendants conspired to cause some or all of the following individuals or organizations to act as agents of a foreign principal while concealing from those individuals or organizations the fact that they were acting as agents of a foreign principal and therefore either the individuals or organizations or the conspirators (or both) would have had a legal duty to register under the Foreign Agents Registration Act:

[REDACTED]



Please do not hesitate to contact us if you have any questions about this information.

Sincerely,

/s/  
Heather Alpino  
Trial Attorney  
National Security Division

/s/  
Jonathan Kravis  
Kathryn Rakoczy  
Luke Jones  
Assistant U.S. Attorneys