IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
v.) Crim	. No. 1:19-cr-148
)	
)	
PRAKAZREL MICHEL,)	
LOW TAEK JHO)	
)	

UNITED STATES' NOTICE RE VOIR DIRE, EXHIBIT LIST, & WITNESS LIST

The United States, by and through its undersigned attorneys, respectfully submits this Notice pursuant to the Court's Pretrial Scheduling Order, ECF No. 106. Prior to filing this Notice, on today's date, September 30, 2022, the government provided to defense counsel via email a Witness List, including 70 witnesses, 20 of whom are custodians, and an Exhibit List, including 552 exhibits with descriptions and corresponding Bates numbers. The government anticipates potentially identifying limited additional witnesses and exhibits between today and the start of trial on November 4, 2022. The government will provide notice to defense counsel of any additional witnesses and exhibits identified prior to trial. The government will also provide a full electronic set of marked exhibits to defense counsel prior to trial. Finally, the government will file the Witness List and Exhibit List on the public docket in advance of trial.

On September 21, 2022, the government notified defense counsel that the government had no objections to the Court's proposed voir dire questions and proposed a Statement of the Case largely mirroring the Statement of the Case proposed below for inclusion during voir dire. Defense counsel has not responded or objected to the government's proposed Statement of the Case.

Statement of the Case

The defendant, Mr. Michel is charged with two schemes to obtain illegal access to and influence with high-ranking officials in the United States government. First, Mr. Michel is charged with several offenses stemming from his alleged illegal political contributions on behalf of a foreign national, Low Taek Jho ("Jho Low"), into political committees supporting the reelection of former President of the United States Barack Obama in 2012. Mr. Michel is alleged to have moved Jho Low's money through third parties, also known as conduits, and his own companies to conceal the foreign source of the funds. Michel is also alleged to have caused the filing of false reports with, and to have submitted his own false declaration to, the Federal Election Commission concealing Jho Low as the true source of the political contributions allegedly made by third parties at his direction and allegedly made by Mr. Michel through his own businesses. Mr. Michel is also alleged to have illegally attempted to discourage witnesses from cooperating with the government's investigation into Michel's making of illegal foreign and conduit political contributions.

Second, Mr. Michel is charged with several offenses relating to his alleged agreement to work with a politically connected individual in the United States on behalf of Jho Low in an attempt to influence former President of the United States Donald Trump and high-ranking individuals in his Administration to end a DOJ civil and criminal investigation into Jho Low, all while concealing that Mr. Michel and his co-conspirators were working on behalf of Jho Low. Mr. Michel is also alleged to have agreed to work with the same individuals on behalf of the People's Republic of China ("PRC" or "China") to influence former President Donald Trump and high-ranking members of his Administration to remove a Chinese dissident from the United States and send him back to China, also while concealing that Mr. Michel and his co-conspirators were

working on behalf of the PRC government. Mr. Michel is alleged to have received tens of millions of dollars for these influence efforts and to have failed to disclose his status as an agent of Jho Low and the People's Republic of China to the United States Department of Justice and the Attorney General. Mr. Michel is also alleged to have engaged in international financial transactions to promote the illegal influence efforts on behalf of Jho Low and to have engaged in domestic financial transactions for the purpose of concealing the true source, purpose, and control of the funds. Finally, Mr. Michel is alleged to have agreed to make false statements to financial institutions regarding the purpose and source of the transactions and funds used to pay for and further the illegal influence campaigns.

Respectfully submitted,

COREY R. AMUNDSON Chief, Public Integrity Section Criminal Division U.S. Department of Justice

By: /s/ John D. Keller

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will serve counsel for the Defendant via electronic notification.

Dated: September 30, 2022 /s/ John D. Keller John D. Keller