

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

**UNITED STATES OF AMERICA**

v.

**MICHAEL A. SUSSMANN,**

**Defendant**

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**Case No. 1:21-cr-00582 (CRC)**

**DECLARATION OF ROBERT E. MOOK**

Robert E. Mook deposes and states as follows:

1. I am competent to provide the following testimony in connection with the Government's Motion to Compel the Production of Purported Privileged Communications Withheld by Non-Party Entities. This declaration provides facts related to certain issues raised in the Motion.

2. Beginning in 2003, I became employed in Presidential campaigns on behalf of Democratic candidates, and I have worked on Presidential and other campaigns since then. When Secretary Hillary Clinton formally announced her candidacy for the 2016 Presidential campaign, I was appointed as Campaign Manager for the campaign, which was known as Hillary for America (HFA). I had responsibility for the day-to-day management of the campaign during the entire Presidential campaign.

3. In April 2015, HFA engaged Marc Elias and the law firm of Perkins Coie as its general counsel. I signed the engagement letter on behalf of HFA. It was my expectation that the law firm would be responsible for providing legal services and legal advice to HFA.

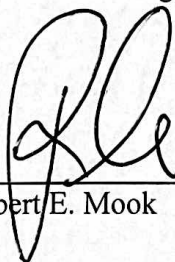
4. When HFA engaged Perkins Coie as its general counsel in April 2015, Donald Trump had not yet announced his candidacy for the Presidency. He announced his candidacy in June 2015.

5. By April 2016, Donald Trump had a significant lead in the delegate count for the Republican nomination, and it seemed highly likely that he would eventually be the Republican nominee for the 2016 Presidential election.

6. One of the topics about which Perkins Coie provided legal services and legal advice to HFA involved fact-finding and research that the campaign conducted regarding candidate Donald Trump. Although I was not aware during the campaign of any contractors that Perkins Coie engaged to assist it in providing legal services and legal advice regarding this work, I did believe throughout the campaign that whatever work Perkins Coie performed, either through its own professionals or through any contractors it may have engaged to assist it, the work was done for the purpose of providing legal services and legal advice to HFA.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 18, 2022.

  
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Robert E. Mook