



Rodney F. Page
Senior Counsel
Direct: 202/508-6002
rfpage@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP
1155 F Street NW
Washington DC 20004 1357
T: +1 202 508 6000
F: +1 202 508 6200
www.bclplaw.com

August 17, 2018

VIA ELECTRONIC TRANSMISSION

The Honorable Charles E. Grassley
Chairman
U.S. Senate Committee on the Judiciary
224 Dirksen Senate Office Building
Washington, DC 20510

c/o

Mr. Daniel Parker
Investigative Assistant
Chairman Charles E. Grassley
U.S. Senate Committee on the Judiciary
224 Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Grassley,

I am writing on behalf of Adam Waldman in response to your letter of August 10, 2018 requesting certain documents to be provided to you and the scheduling of a transcribed interview. At this writing, Mr. Waldman is out of the country and not expected to return to Washington for several weeks. We have consulted with him, and we decline at this time to make any commitment for him to respond to your requests.

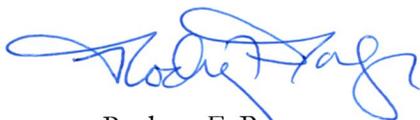
In prior correspondence with you, I noted that Mr. Waldman is a practicing lawyer, and the subject matter of your inquiries is likely to involve his professional activities for his clients. Thus, his participation in an interview or providing documents, in the event he were at some point to agree to do so, would be subject to a reservation of all rights and all privileges to which he is entitled as a witness, as a lawyer, and otherwise. If he agreed to schedule an interview, he would not waive any such rights or privileges, and he would specifically reserve the right to terminate his voluntary participation at any time and for any reason. In addition, he would expect that the scope of any document production and associated protections around such document production be agreed upon by you in advance of any voluntary interview, including confidentiality surrounding such a production and the transcript of any interview. Although your letter of August 10 says that your staff is "willing to work on" these issues, there has been no substantive response from them.

The Honorable Charles E. Grassley
August 17, 2018
Page 2

Although your staff has mentioned that video interviews had been conducted with some other witnesses and that such an arrangement might be a possibility here, we did not agree to a video interview, nor does our client believe such a format would be convenient or appropriate, if he were to agree to an interview.

In a telephone conversation with your staff on June 2, after OFAC issued a license for Mr. Waldman to cooperate with the Judiciary Committee, if he chose to do so, my colleague Mark Srere and I stated that we were not authorized to make any commitment for Mr. Waldman to provide documents or to participate in an interview on the dates requested, or at all, and your staff acknowledged that position on our part. Unless and until Mr. Waldman determines otherwise, there is no change in our position.

Sincerely yours,



Rodney F. Page

cc: The Honorable Dianne Feinstein
Ranking Member
Committee on the Judiciary
United States Senate

Mark A. Srere, Esq.