

KEY FINDINGS OF FACT IV

“President Trump ordered the suspension of \$391 million in vital military assistance urgently needed by Ukraine . . . The President did so despite . . . his obligations under the Impoundment Control Act.”

PROFESSOR KARLAN

that is what President Trump has done. The list of impeachable offenses that the Framers included in the Constitution shows that the essence of an impeachable offense is a President's decision to sacrifice the national interest for his own private ends.



FIONA HILL

Ms. Hill. The specific instruction was that I had to go to the lawyers, to John Eisenberg, our senior counsel for the National Security Council, to basically say, you tell Eisenberg, Ambassador Bolton told me, that I am not part of this whatever drug deal that Mulvaney and Sondland are cooking up.

Mr. Goldman. Did you go speak to the lawyers?

Ms. Hill. I certainly did.

LIEUTENANT COLONEL VINDMAN

LT. COL. VINDMAN: I thought it was wrong. I thought it was wrong for the President of the United States to call for an investigation of -- call a foreign power to investigate a U.S. citizen.

So I made a judgment call. I thought this was wrong. My experience has always suggested that if there is -- if you feel like something is wrong, it is your duty to report it to your seniors, and that's what I did.



What exactly did you hope Zelensky would do about the Bidens after your phone call? Exactly?

UNANIMOUS CONSENSUS: RELEASE THE AID



TIM MORRISON



LT. COL. VINDMAN

NSC



LAURA COOPER

Defense



GEORGE KENT



PHILIP REEKER



DAVID HALE

State



KURT VOLKER



AMB. GORDON SONDLAND



JENNIFER WILLIAMS



BILL TAYLOR

White House



MARK SANDY

OMB

The Washington Post

Trump administration sought billions of dollars in cuts to programs aimed at fighting corruption in Ukraine and elsewhere

Oct. 23, 2019

AMBASSADOR SONDLAND

The Chairman. Because we've had a lot of argumentation here, "Well, the Ukrainians didn't know the aid was withheld," but the Ukrainians found out and then it was made abundantly clear, if they hadn't put two and two together themselves, that if they wanted that aid, they were going to have to make these statements, correct?

Ambassador Sondland. Correct.

The Washington Post

The Post's View • Opinion

Trump tries to force Ukraine to meddle in the 2020 election

Some suspect Mr. Trump is once again catering to Mr. Putin, who is dedicated to undermining Ukrainian democracy and independence. But we're reliably told that the president has a second and more venal agenda: He is attempting to force Mr. Zelensky to intervene in the 2020 U.S. presidential election by launching an investigation of the leading Democratic candidate, Joe Biden. Mr. Trump is not just soliciting Ukraine's help with his presidential campaign; he is using U.S. military aid the country desperately needs in an attempt to extort it.

September 5, 2019 at 7:31 p.m. EDT

Excerpts

THE PRESIDENT'S DIRECTION TO HOLD THE AID

July 18	President Trump withholds aid
July - Sept	Ukrainians told to get aid, must announce investigations
End of August	Zelensky agrees to make statement on CNN
August 26	White House receives Whistleblower Complaint
September 5	Press reports Trump using Ukraine for investigations
September 9	Congress launches investigation
September 11	Trump releases the aid
September 18-19	Zelensky cancels CNN interview

LIEUTENANT COLONEL VINDMAN

Q Okay. Was there discussion about that investigation at the NSC?

A I'm trying to remember if there was a discussion. You know, maybe only in the form of like water cooler talk on the fact that this was likely going to, you know -- this might have the effect of releasing the hold.

Q The hold on the security assistance?

A Yes.

Q Why?

A Just because it was -- there was an inquiry going on, and it would be potentially politically challenging to, you know, justify that hold.

AMBASSADOR TAYLOR

According to Mr. Morrison, President Trump told Ambassador Sondland he was not asking for a quid pro quo, but President Trump did insist that President Zelensky go to a microphone and say he is opening investigations of Biden and 2016 election interference and that President Zelensky should want to do this himself.

TIM MORRISON

both -- the President said there was not a quid pro quo, but he further stated that President Zelensky should want to go to the microphone and announce personally -- so it wouldn't be enough for the prosecutor general, he wanted to announce personally, Zelensky personally, that he would open the investigations.

SEPTEMBER 9, 2019

12:47 AM

As I said on the phone, I think it's crazy to withhold security assistance for help with a political campaign.



TAYLOR

5:19 PM

Bill, I believe you are incorrect about President Trump's intentions. The President has been crystal clear: no quid pro quo's of any kind. The President is trying to evaluate whether Ukraine is truly going to adopt the transparency and reforms that President Zelensky promised during his campaign. I suggest we stop the back and forth by text. If you still have concerns, I recommend you give Lisa Kenna or S a call to discuss with them directly. Thanks.



SONDLAND

LIEUTENANT COLONEL VINDMAN

LT. COL. VINDMAN: So, Congressman, the power disparity between the President of the United States and the President of Ukraine is vast, and, you know, in the President asking for something, it became -- there was -- in return for a White House meeting, because that's what this was about. This was about getting a White House meeting. It was a demand for him to fulfill his -- fulfill this particular prerequisite in order to get the meeting.

AMBASSADOR TAYLOR

Ambassador Sondland also said that he had talked to President Zelensky and Mr. Yermak and had told them that, although this was not a quid pro quo, if President Zelensky did not clear things up in public, we would be at a stalemate. I understood a "stalemate" to mean that Ukraine would not receive the much-needed military assistance.

Ambassador Sondland said that this conversation concluded with President Zelensky agreeing to make a public statement in an interview on CNN.

DAVID HOLMES

Finally, also on September 13th, Ambassador Taylor and I ran into Mr. Yermak on our way out of a meeting with President Zelensky in his private office. Ambassador

Taylor again stressed the importance of staying out of U.S. politics and said he hoped no interview was planned. Mr. Yermak did not answer but shrugged in resignation, as if to indicate that he had no choice.

In short, everybody thought there was going to be an interview and that the Ukrainians believed they had to do it.

The interview ultimately did not occur.

DAVID HOLMES

I then heard President Trump ask, quote, "So he's going to do the investigation?" unquote. Ambassador Sondland replied that, "He's going to do it," adding that President Zelensky will, quote, "Do anything you ask him to."

JULY 25 CALL



**LT. COL.
VINDMAN**

“What I heard was inappropriate, and I reported my concerns to Mr. Eisenberg.”



**TIM
MORRISON**

“After the call, I promptly asked the NSC Legal Advisor and his Deputy to review it.”



**JENNIFER
WILLIAMS**

“[I]t struck me as unusual and inappropriate.”

DAVID HOLMES

- 2 I then heard President Trump ask, "So he's going to do the investigation?"
- 3 Ambassador Sondland replied that he is going to do it, adding that President Zelensky will
- 4 do "anything you ask him to do."

“It’s not only a conspiracy theory, it is completely debunked.”

**-Tom Bossert, President Trump’s Former
Homeland Security Advisor**



DAVID HOLMES

“[It would be to Putin’s advantage to promote Ukraine interference theory,] [f]irst of all, to deflect from the allegations of Russian interference. Second of all, to drive a wedge between the United States and Ukraine, which Russia wants to essentially get back into its sphere of influence. Thirdly, to besmirch Ukraine and its political leadership, to degrade and erode support for Ukraine from other key partners in Europe and elsewhere.”



FIONA HILL

“I am very confident based on all the analysis that has been done – and, again, I don’t want to start getting into intelligence matters – that the Ukrainian Government did not interfere in our election in 2016.

This is a fictional narrative that is being perpetrated and propagated by the Russian security services themselves.”

ELECTION INTERFERENCE CONCLUSIONS

1. Russia interfered in our 2016 elections.
2. Ukraine did not interfere in our 2016 elections.
3. There is evidence that Russia perpetrated the allegation that Ukraine interfered in our 2016 elections.
4. Russia benefits from U.S. investigating Ukraine.

ATTACKS ON WITNESSES WHO TESTIFIED



TAYLOR



Donald J. Trump ✓
@realDonaldTrump

Never Trumper Republican John Bellinger, represents **Never Trumper Diplomat Bill Taylor** (who I don't know), in testimony before Congress! Do Nothing Democrats allow Republicans Zero Representation, Zero due process, and Zero Transparency....

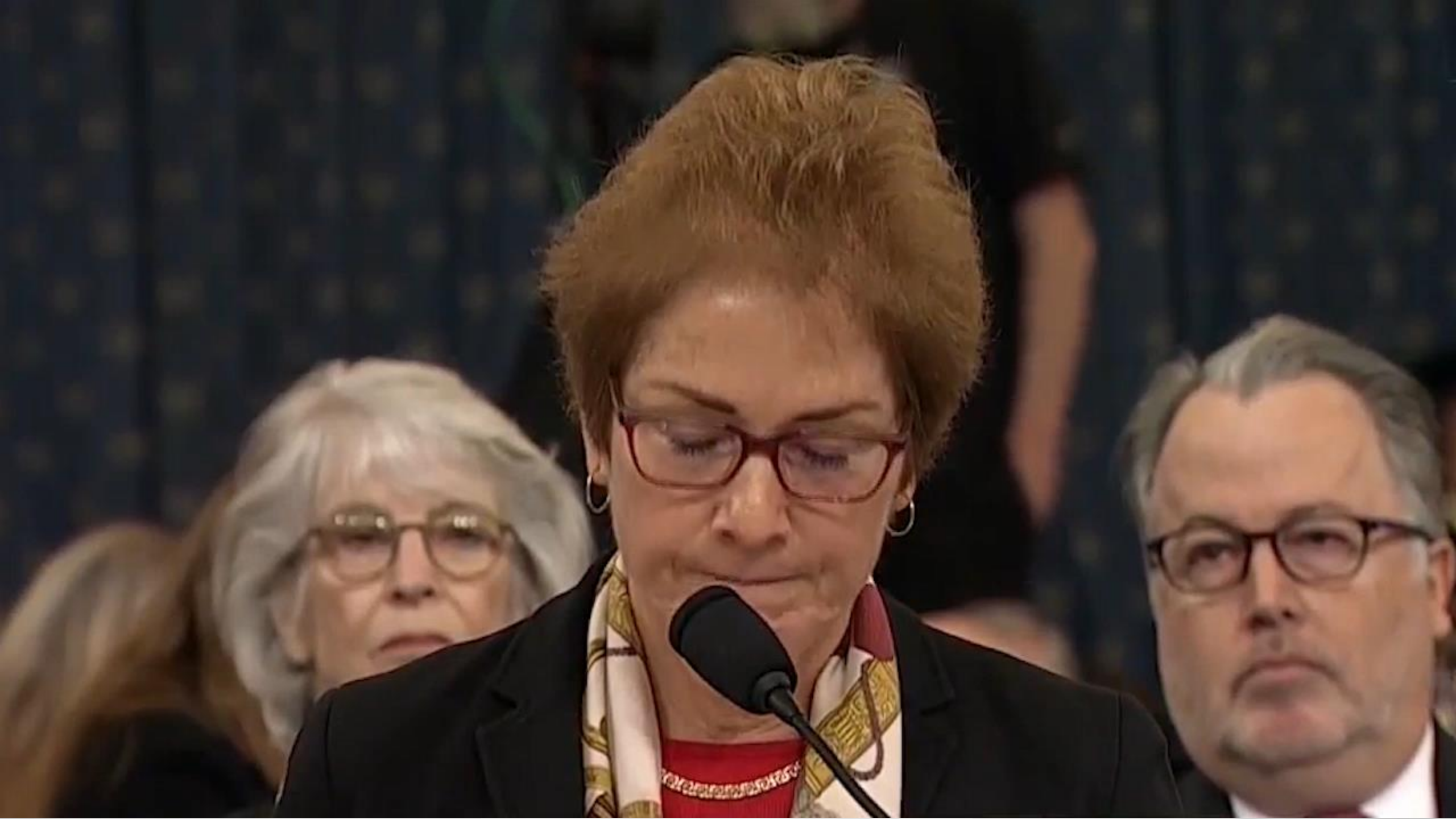
2:58 PM · Oct 23, 2019 · [Twitter for iPhone](#)



Donald J. Trump ✓
@realDonaldTrump

The **Never Trumper Republicans**, though on respirators with not many left, are in certain ways worse and more dangerous for our Country than the Do Nothing Democrats. Watch out for them, **they are human scum!**

1:48 PM · Oct 23, 2019 · [Twitter for iPhone](#)



“I want to take a moment to recognize the courage of my colleagues who have appeared and are scheduled to appear before this committee. I want to state that the character attacks on these distinguished and honorable public servants is reprehensible.”

- Lt. Col. Alexander Vindman

THE PRESIDENT'S REFUSAL TO ALLOW AIDES TO COMPLY



**SEC. MIKE
POMPEO**



**T. ULRICH
BRECHBUHL**



**SEC. MARK
ESPER**



**SEC. RICK
PERRY**

State Department

Department of Defense

Department of Energy



**JOHN
BOLTON**



**MIKE
PENCE**



**MICHAEL
DUFFEY**



**MICHAEL
ELLIS**



**JOHN
EISENBERG**



**ROBERT
BLAIR**



**MICK
MULVANEY**



**BRIAN
MCCORMACK**



**RUSSELL
VOUGHT**



**CHARLES
KUPPERMAN**



**WELLS
GRIFFITH**

White House

OMB

National Security Council



AMBASSADOR



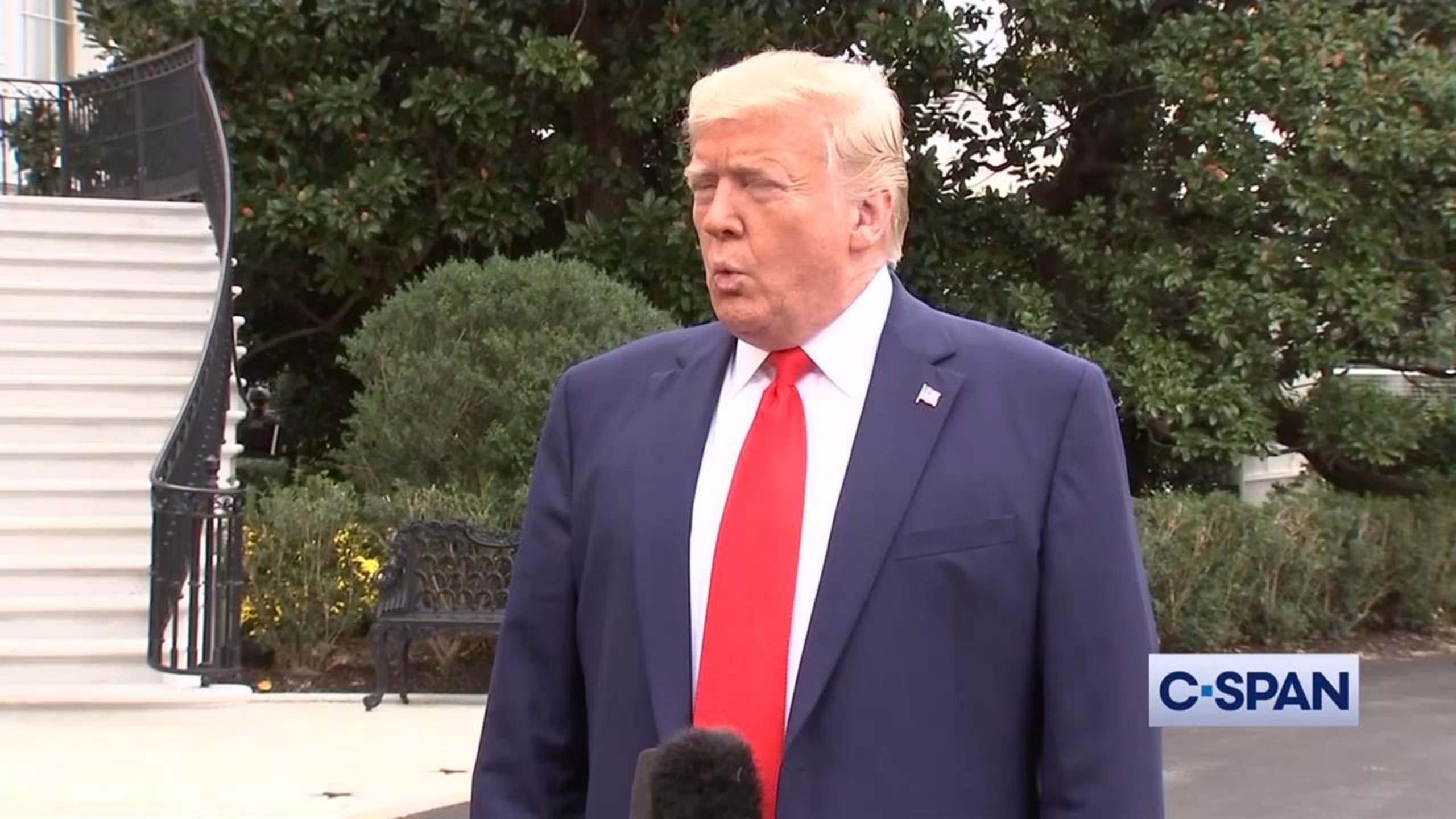


JUDGE JACKSON OPINION

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Stated simply, the primary takeaway from the past 250 years of recorded American history is that **Presidents are not kings. ...**

To make the point as plain as possible, it is clear to this Court for the reasons explained above that, with respect to senior-level presidential aides, absolute immunity from compelled congressional process simply does not exist. ...



C-SPAN

KEY FINDINGS OF FACT VIII

“Faced with the revelation of his actions, President Trump publicly and repeatedly persisted in urging foreign governments, including Ukraine and China, to investigate his political opponent. This continued solicitation of foreign interference in a U.S. election presents a clear and present danger that the President will continue to use the power of his office for his personal political gain.”

Today

WHITE HOUSE
WASHINGTON

WHITE HOUSE BRIEFING

MICK MULVANEY
Acting White House Chief of Staff

C-SPAN3

For Internal Use Only



Prof. Pamela S. Karlen