

# **EXHIBIT 3**



► WASHINGTON DC

1828 L Street, NW | Suite 1000  
Washington, DC 20036  
202.973.0900  
[www.tzlegal.com](http://www.tzlegal.com)

CALIFORNIA

The Tower Building  
1970 Broadway | Suite 1070  
Oakland, CA 94612  
510.254.6808

**VIA ELECTRONIC MAIL**

July 15, 2019

Our File No. 474-01

Charles J. Harder  
Harder LLP  
132 S. Rodeo Drive, Fourth Floor  
Beverly Hills, CA 90212  
[charder@harderllp.com](mailto:charder@harderllp.com)

Dear Charles:

In order to determine how best to proceed pursuant to the Court's direction regarding the video footage showing Defendant Trump kissing Ms. Johnson ("Video"), I have a few important requests that I ask you to respond to no later than July 17, 2019. We could reduce these requests into a set of discovery requests, but in light of the upcoming deadline and the seriousness of your sanctions threat, we think that it is in the interests of all parties that you share this information immediately so that the Court and the parties can have a complete and full record regarding the circumstances surrounding your procurement of (and belated production of) the Video.

First, please send us the original unaltered Video. This means without any edits and containing the full metadata.

Second, please tell us when you first received the Video.

Third, please tell us from whom you obtained the Video.

Fourth, please explain why you waited until July 5, 2019 to produce the Video.

Fifth, please provide any other video and photographs taken from the same device as the Video captured on the same day.

Sixth, please identify who spliced the video in with over eight hours of other footage and explain why you produced the Video in this manner.

Finally, if you have any other photographs or videos depicting any portion of the interaction between Mr. Trump and Ms. Johnson, please produce them.

I look forward to your response to these questions.

Regards,

A handwritten signature in black ink, appearing to read 'H. Zavareei', written over a circular scribble.

Hassan A. Zavareei